



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

REPLY TO THE ATTENTION OF:

MAY 07 2010

LR-8J

CERTIFIED MAIL 7009 1680 000 7665 1547
RETURN RECEIPT REQUESTED

Ms. Barbara Halcomb
Acting Manager, Environmental Compliance/Waste Management
United States Enrichment Corporation
Portsmouth Gaseous Diffusion Plant
Post Office Box 628
Piketon, Ohio 45661

Re: Notice of Violation
RCRA Compliance Inspection
United States Enrichment Corporation
Portsmouth Gaseous Diffusion Plant
Piketon, Ohio
OHD 987 054 723

Dear Ms. Halcomb:

On June 22nd and June 23rd, 2009, representatives of the U.S. Environmental Protection Agency and Ohio Environmental Protection Agency (OEPA) inspected the United States Enrichment Corporation (USEC) facility located at 3930 US Route 23, Piketon, Ohio. The purpose of the inspection was to evaluate USEC's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on information provided by USEC personnel, review of records, and physical observations by the inspectors, EPA has determined that USEC is a large quantity generator of hazardous waste, that it is a large quantity handler of universal waste, is engaged in storage of hazardous waste without a permit, and that it is in violation of certain requirements of the Ohio Administrative Code (OAC) and the United States Code of Federal Regulations (CFR). To be eligible for the exemption from having a hazardous waste storage permit, USEC must be in compliance with the conditions of OAC 3745-52-34(A) and (C) [40 CFR § 262.34(a) and (c)]. We find that USEC is in noncompliance with the following conditions for a storage permit exemption, and in violation of the following generator requirements:

- 1) A large quantity generator must determine whether its waste is a hazardous waste. See, OAC Rule 3745-52-11 [40 CFR § 262.11].

At the time of the inspection of the area around the Steam Plant, the inspectors observed various materials that had been discarded, see photographs 1 through 7. USEC had not made waste determinations on these materials. USEC, therefore, violated the above-referenced generator requirement.

- 2) In order to avoid the need for a hazardous waste storage permit, a large quantity generator that is placing hazardous waste in tanks must comply with OAC Rules 3745-66-90 to 3745-66-101. See, OAC Rule 3745-52-34(A)(1)(b). Specifically, the owner or operator must inspect where present, at least once each operating day: (1) Overfill/spill control equipment; (2) Aboveground portions of the tank system; (3) Data gathered from monitoring equipment and leak detection equipment; and (4) Construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary containment structures. See, OAC Rule 3745-66-95(A) [40 CFR § 265.195(b)(1) through (3)]. Under OAC Rule 3745-66-95(C) [40 CFR § 265.195(g)], the owner or operator must document in the operating record of the facility an inspection of the items listed above.

During the inspection of Building X-700, the inspectors asked about the daily tank inspection logs for Tank 2 and Tank 3. USEC personnel told the inspectors that the daily inspection logs had been maintained until 3/4/2009. At the time of the inspection, USEC had not maintained the daily inspection logs for almost four months. USEC, therefore, failed to comply with the above-mentioned condition for a storage license exemption and violated the tank inspection requirement.

- 3) With few exceptions, Rules 3745-279-20 to 3745-279-24 of the OAC apply to all used oil generators. See, OAC Rule 3745-279-20(A). One requirement imposed on used oil generators is that containers and aboveground tanks used to store used oil at generator facilities be labeled or marked clearly with the words "Used Oil." See, OAC Rule 3745-279-22(C) [40 CFR § 279.22].

During the inspection of the Building X-750, the inspectors observed a 55-gallon container used to store used oil that was not labeled "Used Oil." At the time of the inspection, USEC personnel labeled the container "Used Oil." EPA considers this violation resolved.

- 4) A large quantity handler of universal waste must manage lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment. Specifically, a large quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain

closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. See, OAC Rule 3745-273-33(D)(1).

During the inspection of the Buildings X-700 and X-326, the inspectors observed several plastic bags containing used fluorescent lamps. The plastic bags were not structurally sound to prevent breakage of the used fluorescent lamps. At the time of the inspection, USEC was, therefore, in violation of OAC Rule 3745-273-33(D)(1) [40 CFR § 273.33(d)(1)].

In addition, at the time of the inspection of the Garage Building, the inspectors observed several vehicles with lead acid batteries even though they appeared to be out of service (e.g., two golf carts). USEC should develop a Standard Operating Procedure (SOP) for determining when used lead acid batteries should be removed from excess vehicles. Spent lead acid batteries which are not managed under OAC Rule 3745-58-70 are subject to management under OAC Chapter 3745-273. See, OAC Rule 3745-273-02. An unused battery becomes a waste on the date the handler decides to discard it. See, OAC Rule 3745-273-02(C)(2).

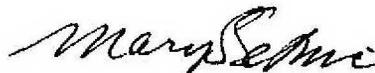
A large quantity generator who accumulates hazardous waste on-site for 90 days or fewer and who does not meet the conditions for a permit exemption of OAC Rule 3745-52-34 is an operator of a hazardous waste storage facility, and is required to apply for and obtain an Ohio hazardous waste storage permit. See, OAC 3745-52-34(A), 3745-50-41(A), 3745-50-45(A).

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

You should submit your response to Walt Francis, U.S. Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. You should also submit a copy of your response to Melody Stewart at the OEPA Southeast District Office, 2195 Front Street, Logan, Ohio 45138.

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

Sincerely,

A handwritten signature in cursive script that reads "Mary Setnicar".

Mary S. Setnicar
Acting Chief, RCRA Branch
Land and Chemicals Division

Enclosure

cc: Melody Stewart, OEPA-Southeast District Office

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME: US ENRICHMENT CORPORATION PORTSMOUTH
GASEOUS DIFFUSION PLANT

FACILITY U.S. EPA ID NO.: OHD 987 054 723
FACILITY TYPE: Large Quantity Generator
FACILITY ADDRESS: 3930 US Route 23 South
Piketon, Ohio 45661

U.S. EPA REPRESENTATIVE: Walt Francis

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

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

NAICS CODE: 325188 - All Other Basic Inorganic Chemical
Manufacturing

PREPARED BY: Walt Francis
Walt Francis
Environmental Scientist

7/13/09
Date

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

7-13-09
Date

Purpose of Inspection

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

Participants

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

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

Representatives of USEC -

Barbara Halcomb – Acting Manager, Environmental Compliance/Waste Management

Jeff Kemp, Environmental Engineer

Kenneth Horsley, Environmental Engineer

Bryan Corbin, Section Manager, Environmental Compliance/Waste Management

Site Description/Background Information

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

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

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in U.S. DOE owned and permitted storage facilities. Waste generated by U.S. DOE and LATA/Parallax from the environmental restoration

is also stored in these facilities. USEC also generates non mixed radioactive hazardous waste which is shipped out of Building XT-847. USEC ceased the enrichment process in May 2001.

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

USEC generated hazardous wastes are primarily shipped to Permafix in Florida. In addition, a wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes. USEC, Inc. is working on a pilot centrifuge project to purify uranium U235 in the X-7725 Building. On November 24, 2008, Ohio EPA sent a Notice of Violation to USEC based on a November 3, 2008, inspection which included storing hazardous waste for greater than 90 days in tanks without obtaining a hazardous waste facility installation and operation permit, failure to make a hazardous waste determination, failure to label containers of used oil, and failure to label or mark a container of universal waste.

Opening Conference

On June 22, 2009, U.S. EPA representative Walt Francis and Ohio EPA representative Melody Stewart met with Ms. Barbara Halcomb, Mr. Jeff Kemp and Mr. Kenneth Horsley in a conference room in Building XT-847 and informed the USEC representatives of the nature, scope, and procedures of the RCRA inspection. The inspection was conducted by U.S. EPA and OEPA personnel as a Federal lead inspection. The facility representatives provided the team with a brief update of the facility since the last inspection. Ms. Barbara Halcomb allowed the inspectors access to the facility to conduct the inspection.

Site Tour

The walk-through began in Building X-705 where USEC maintains two less than 90 day accumulation areas, several satellite accumulation areas (SAAs), and one universal waste staging area. Prior to entering the controlled area of Building X-705, the inspectors, Mr. Kemp and Mr. Horsley had to don coveralls, plastic boots, protective gloves, and safety glasses. Mr. Todd Bobst met the inspection team in Building X-705, and showed the inspectors the SAAs and the Furnace Stand heavy metal sludge accumulation containers. The walkthrough continued to a less than 90 day accumulation area (X-705 Micro), where USEC operates a heavy metal precipitation unit that generates radioactive heavy metal precipitate and filter paper. The walkthrough continued in Building X-705 to H Area, and then to the first floor where USEC maintains an oil and grease separation unit. The walkthrough continued to Building X-700 where the inspectors observed a less than 90 day hazardous waste accumulation area (X-700 F.S.), which contained

four 55-gallon container of heavy metal precipitate from Building X-705. The walkthrough continued to an area in Building X-700 where USEC maintains a tanker truck utilized for the accumulation of water from sumps in the basement of Building X-700 (X-700 C.S.). The tanker truck is identified as a less than 90 day hazardous waste accumulation area. The inspectors also observed several boxes and a plastic bag of used fluorescent lamps. The inspectors met Mr. John Yeagle who maintained a notebook of daily tank inspection records for the inground tanks in Building X-700. The walkthrough continued through Building X-700 to the in-ground tank area. Inspector Francis observed that Tanks #2 and #3 had an accumulation date of 12/9/08, Tank #4 had an accumulation date of 12/9/08 and Tank #1 had an accumulation date of 3/11/09. The inspection continued to Building X-720, where USEC maintains several less than 90 day accumulation areas, SAAs, and universal waste staging areas. Also, in Building X-720, USEC maintains a Paint Shop which has a SAA and a less than 90 day accumulation area. In Building X-720C, the inspectors observed a less than 90 day area that was empty. Also, in Building X-720C, USEC stores various oils and used oil. The walkthrough continued at Building X-750 where USEC operates a maintenance area for on-site vehicles. This includes one less than 90 day hazardous waste accumulation area, a SAA, and a used lead acid battery accumulation area. In addition, USEC accumulates used oil in containers in Building X-750. USEC stores various vehicles around Building X-750. The inspection observed two golf carts and a large pump that contained lead acid batteries. The walkthrough continued at Building X-333, where the inspectors met Ms. Vicki Glenn. In Building X-333, USEC maintains two areas for less than 90 day hazardous waste accumulation, SAAs and universal waste staging areas. The walkthrough continued at Building X-330, where USEC maintains two areas for less than 90 day hazardous waste accumulation, two SAAs and four universal waste staging areas. The walkthrough continued at Building X-326 where USEC maintains three areas for less than 90 day hazardous waste accumulation, SAAs and universal waste staging areas. The walkthrough continued to Warehouse 9 where USEC accumulates lead acid batteries prior to off-site shipment. The walkthrough continued at Building X-7721 where the inspectors observed several SAA containers and some Universal Waste used lamps and then the inspection continued to Building X-710 where the inspectors met Mr. Brian Pyles. USEC maintains two less than 90 day hazardous waste accumulation areas, several SAAs and a universal waste staging area in Building X-710. The walkthrough continued in Building X-710 to rooms 101, 103, 113, 144, 212, 213, 254, and 263. The inspection continued at the Steam Plant. The inspectors observed two 55-gallon containers labeled "Beryllium Waste", a rusty 5-gallon container, one oxide battery, and four rusty 55-gallon containers, several plastic buckets in a waste pile (see photograph) and one blue plastic 55-gallon container (see photographs). The inspectors returned to Building XT-847, where USEC maintains several less 90 day accumulation areas, SAAs, used oil area, and a universal waste staging area.

The inspectors then returned to the conference room in Building XT-847 to review records.

Records Review

A record review was conducted. The inspection team requested to review hazardous waste

manifests, land disposal restriction forms, mixed-waste shipment documentation, universal waste and used oil shipping records, personnel training information, weekly inspection logs and the latest version of the contingency plan. The inspectors reviewed hazardous waste manifests since the date of the last inspection, two years of personnel training records, and weekly inspection logs. The inspectors reviewed a July 24, 2008, revision of the Contingency Plan.

Closing Conference

The inspectors conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. USEC would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, and completed inspection checklists. The inspectors notified the facility that they had concerns about the accumulation of used fluorescent bulbs in clear plastic bags. Inspector Francis mentioned that the daily tank inspections in Building X-700 had stopped on 3/4/2009, and during the inspection of Building X-750 a container of used oil was not labeled, and during the inspection of Building X-7721, the inspectors observed a 55-gallon SAA container that was full with a "4/22/09" sampling date on the drum. The inspectors reminded the USEC staff that a full SAA container should be moved to a less than 90 day accumulation area within three days. In addition, the inspectors discussed the various containers observed around the Steam Plant.

Attachments

Inspection Checklists.

**LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

CESQG: ≤ 100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.

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

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

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds

Safety Equipment Used:

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] ^{STEAM - WASTE} Yes No N/A
2. Are records of waste determination being kept for at least 3 years? [3745-52-40(C)] Yes No N/A
3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes No N/A
4. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] Yes No N/A
5. Are annual reports kept on file for at least 3 years? [3745-52-40(B)] Yes No N/A
6. Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] Yes No N/A
7. Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] Yes No N/A
8. Does the generator accumulate hazardous waste? Yes No N/A

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

9. Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)? Yes No N/A

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

10. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]
- a. Container that meets 3745-66-70 to 3745-66-77? Yes No N/A
 - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? Yes No N/A
 - c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A
 - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

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

MANIFEST REQUIREMENTS

12. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes No N/A
13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] Yes No N/A

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

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

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

15. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes No N/A
16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] Yes No N/A

NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.

- 17. If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Yes No N/A
- 18. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes No N/A
- 19. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes No N/A

NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.

PERSONNEL TRAINING

- 20. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes No N/A
- 21. Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes No N/A
- 22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A
- 23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes No N/A
- 24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No N/A
- 25. Does the generator keep records and documentation of:
 - a. Job titles [3745-65-16D(1)]? Yes No N/A
 - b. Job descriptions [3745-65-16D(2)]? Yes No N/A
 - c. Type and amount of training given to each person [3745-65-16D(3)]? Yes No N/A
 - d. Completed training or job experience required [3745-65-16D(4)]? Yes No N/A
- 26. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes No N/A

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

Job Performed	Name of Employee	Date Trained
	Beverly Kellan	12/1/05
	Victoria Glenn	4/4/08
	Orren Pyles	1/14/09 - new hire

CONTINGENCY PLAN

- 27. Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes No N/A
- 28. Does the plan describe the following:
 - a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? Yes No N/A
 - b. Arrangements with emergency authorities [3745-65-52(C)]. Yes No N/A
 - c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes No N/A
 - d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes No N/A

e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes No N/A

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

29. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes No N/A

30. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] Yes No N/A

31. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] ^{Steve Maly} Yes No N/A

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

EMERGENCY PROCEDURES

32. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes No N/A

a. Was the contingency plan implemented? [3745-65-51(B)] Yes No N/A

b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes No N/A

c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes No N/A

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

PREPAREDNESS AND PREVENTION

33. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes No N/A

34. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:

a. Internal communications or alarm system? [3745-65-32(A)] Yes No N/A

b. Emergency communication device? [3745-65-32(B)] Yes No N/A

c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes No N/A

d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes No N/A

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

35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes No N/A

36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No N/A

37. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] Yes No N/A

38. If there is only one employee on the premises, is there immediate access to a device (ex. phone, hand held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32) [3745-65-34(B)] Yes No N/A

39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A

40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes No N/A

41. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes No N/A

SATELLITE ACCUMULATION AREA REQUIREMENTS

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

a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes No N/A

b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes No N/A

c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No N/A

- d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes No N/A
- e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes No N/A
- f. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes No N/A
- a. Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes No N/A
- b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes No N/A 8/4. X-7721

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

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

44. Has the generator marked containers with the words "Hazardous Waste"? [3745-52-34(A)(3)] Yes No N/A
45. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes No N/A
46. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A
- b. In good condition? [3745-66-71] Yes No N/A
- c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. Yes No N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
48. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes No N/A
49. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes No N/A
50. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] Yes No N/A
51. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] Yes No N/A

NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

52. If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] Yes No N/A

NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

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

**GENERATOR LDR CHECKLIST
DOES NOT APPLY TO CESQGS**

GENERAL REQUIREMENTS

- | | | |
|----|--|--|
| 1. | If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07 (A)(7)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 2. | Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

NOTE: This is done by determining if the HW/soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07 (A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).

- | | | |
|----|--|--|
| 3. | Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 4. | Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 5. | Does the generator generate a listed HW that exhibits a characteristic? If yes, | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.

- | | | |
|----|---|--|
| 6. | Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|--|

NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.

NOTE: Written documentation of this determination is not required.

- | | | |
|----|---|--|
| 7. | Did the generator treat his HW/soil on-site to meet the LDR treatment standard? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|--|

NOTE if "Yes" see question #16

- | | | |
|-----|--|--|
| 8. | Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 9. | Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 10. | Does the generator have a copy of the LDR notification form on file? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTIFICATION FORM

- | | | |
|-----|---|--|
| 11. | Does the LDR Notification form contain the following information: | |
| a. | Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d. | A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]. | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.

e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
----	--	--

NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories

f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
----	--	--

NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.

g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for?[3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
----	--	--

NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.

PROHIBITED DILUTION

12.	Is the HW treated by burning? If "No," go to #15.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
13.	Is the HW a metal-bearing HW?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.

14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless <u>one</u> of the following conditions apply. [3745-270-03(c)]	
	i.	Contains > 1% TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	ii.	Contains organic constituents or cyanide at levels greater than the UST levels?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	v.	Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.		Was the HW treated by wastewater treatment?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: If Yes, HW is improperly being treated by dilution.

	b.	Does the waste carry the D001 code and contain ≥10% TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B) and 3745-270-40(A)(3)].

NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.

GENERATOR TREATMENT			
16.	Does the generator treat to meet LDRs on-site [3745-270-40(A)]?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	If "Yes"... complete the rest of the checklist. If "No"... stop...you are done.		
a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>NOTE: This is a laboratory analysis but it does not have to be kept by the generator.</i>			
c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTIFICATION FORM			
17.	a.	Contains all information in #11 a-g above and	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	If the treated HW/soil is listed.....notification contains the following certification statement: * I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:	
	i.	Send a one-time notification to the director?[3745-270-09(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	ii.	Maintain a copy of the notice onsite?[3745-270-09(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iii.	Include in the notification: [3745-270-09(D)(1)(a)]	
	1.	Name & address of receiving landfill?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	2.	Description of HW when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	3.	HW code when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	4.	Treatability group when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	5.	Underlying hazardous constituents present when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iv.	Contain the right certification statement as required by 3745-70-07(b)(4)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

LARGE QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more

Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

GENERAL REQUIREMENTS

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

PROHIBITIONS

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

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES:

4. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)] Yes No N/A ___ RMK# ___
5. If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? Yes No N/A ___ RMK# ___
6. Does the LQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes No ___ N/A ___ RMK# ___
 - b. Mix battery types in one container? Yes No ___ N/A ___ RMK# ___
 - c. Discharge batteries to remove the electric charge? Yes ___ No ___ N/A RMK# ___
 - d. Regenerate used batteries? Yes ___ No N/A ___ RMK# ___
 - e. Disassemble them into individual batteries or cells? Yes ___ No N/A ___ RMK# ___
 - f. Remove batteries from consumer products? Yes ___ No N/A ___ RMK# ___
 - g. Remove the electrolyte from the battery? Yes ___ No N/A ___ RMK# ___

If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-33(A)(2)]

Yes No N/A ___ RMK# ___

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

Yes ___ No N/A RMK# ___

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

Yes ___ No N/A RMK# ___

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

Yes ___ No N/A RMK# ___

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

Yes No N/A ___ RMK# ___

UNIVERSAL WASTE LAMPS

9. Does the LQUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(D)(1)]

Yes ___ No N/A ___ RMK# ___

plastic bags.

10. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous constituents to the environment? [3745-273-33(D)(2)]

Yes No N/A ___ RMK# ___

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

Yes No N/A ___ RMK# ___

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

12. **ACCUMULATION TIME**

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

Yes No ___ N/A ___ RMK# ___

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

Yes ___ No N/A RMK# ___

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

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

Yes No N/A ___ RMK# ___

a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-35(C)(1)]

Yes No ___ N/A ___ RMK# ___

b. Marking or labeling the individual item of universal waste with the date that it became a waste or was received? [3745-273-35(C)(2)]

Yes No ___ N/A ___ RMK# ___

c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-35(C)(3)]

Yes No ___ N/A ___ RMK# ___

d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-35(C)(4)]

Yes ___ No ___ N/A RMK# ___

- e. Placing the universal waste in a specific accumulation area and identifying the earliest that any universal waste in the area became a waste or was received? [3745-273-35(C)(5)] Yes ___ No ___ N/A RMK# ___
- f. Any other method which clearly demonstrates the length of time the universal waste has been accumulated from the date it became a waste or is received? [3745-273-35(C)(6)] Yes ___ No ___ N/A RMK# ___

EMPLOYEE TRAINING

14. Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36] Yes No N/A ___ RMK# ___

RESPONSE TO RELEASES

15. Were releases of universal waste and other residues immediately contained? [3745-273-37(A)] Yes ___ No N/A RMK# ___
16. Was the released material characterized? [3745-273-37(B)] Yes ___ No N/A RMK# ___
17. If the released material was a hazardous waste, was it managed as required in OAC 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-37(C)] Yes ___ No N/A RMK# ___

OFF-SITE SHIPMENTS

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

18. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)] Yes No N/A ___ RMK# ___
Advanced Environ. Recovery, Allentown PA.

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

19. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-38(C)] Yes ___ No N/A RMK# ___
20. Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)] Yes No N/A ___ RMK# ___

21. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following: Yes ___ No N/A RMK# ___
- a. Receive the waste back? [3745-273-38(E)(1)] Yes ___ No ___ N/A RMK# ___
- b. Agree to where shipment will be sent? [3745-273-38(E)(2)] Yes ___ No ___ N/A RMK# ___
22. If a handler rejects a partial or full load from another handler, does the receiver handler contact the originating handler and discuss one of the following: Yes ___ No N/A RMK# ___
- a. Sending the waste back to originating handler? [3745-273-38(F)(1)] Yes ___ No ___ N/A RMK# ___
- b. Sending the shipment to a destination facility? [3745-273-38(F)(2)] Yes ___ No ___ N/A RMK# ___
23. If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)] Yes ___ No N/A RMK# ___
24. If the handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-38(H)] Yes ___ No N/A RMK# ___

TRACKING UNIVERSAL WASTE SHIPMENTS

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

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

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

EXPORTS

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

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

Yes ___ No N/A RMK# ___

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

Yes ___ No N/A RMK# ___

REMARKS

**USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

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"/>

NOTE: For example, used oil contaminated scrap metal stored in a pile.

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 checked="" type="checkbox"/> N/A <input 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"/>
----	--	--

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 checked="" type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil"? [3745-279-22(C)] <i>55672 22A - 644 X - 750</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Stopped the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 type="checkbox"/>

ON-SITE BURNING IN SPACE HEATER

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	
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 checked="" type="checkbox"/> N/A <input 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"/>

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

GENERATOR 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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator. [3745-279-24]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <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 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 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 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 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.

LQG TANK SYSTEM REQUIREMENTS (OAC rule 3745-52-34(A) and OAC rules 3745-66-90 through 3745-66-100)

(Please refer to the rules before or while completing this checklist.)

1. Is each tank clearly labeled/marked with the words "Hazardous Waste" [3745-52-34(A)(3)]? Yes No N/A

TANK SYSTEM - GENERAL OPERATING REQUIREMENTS

2. Does the o/o follow the general operating requirements below:
- a. Does the o/o prevent placement of hazardous waste or treatment reagents in tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail?[3745-66-94(A)] Yes No N/A
- b. Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)?[3745-66-94(B)] Yes No N/A
- c. If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96?[3745-66-94(C)] Yes No N/A

TANK SYSTEM - INSPECTION REQUIREMENTS

3. Has the o/o documented the inspections required in 3745-66-95, in the operating record, including inspection of the following:
- a. Spill control equipment each operating day? [3745-66-95(A)(1)] Yes No N/A
- b. Above ground portion of tank each operating day?[3745-66-95(A)(2)] Yes No N/A
- c. Data from leak detection equipment each operating day?[3745-66-95(A)(3)] Yes No N/A
- d. Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste each operating day?[3745-66-95(A)(4)] Yes No N/A

NOTE: "Each operating day" is each day that the tank system is being used to manage (store or treat) hazardous waste.

4. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter?[3745-66-95(B)(1)] Yes No N/A
5. Where applicable, all sources of impressed current at least bi-monthly?[3745-66-95(B)(2)] Yes No N/A

TANK SYSTEM CLOSURE REQUIREMENTS

6. If the generator has closed a <90 day tank, was closure completed in accordance with OAC 3745-66-97 (except for paragraph C)? Yes No N/A

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES

7. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with one of the following: [3745-66-98(A)] Yes No N/A
- a. Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-66-17(B)?[3745-66-98(A); OR
- b. Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction?[3745-66-98(A); OR
- c. The tank is used solely for emergencies?[3745-66-98(A)] Yes No N/A
8. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (1996)? [3745-66-98(B)] Yes No N/A
9. Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material?[3745-66-99(A) and/or (B)] Yes No N/A
- a. If so, have the requirements of 3745-65-17(B) been met?[3745-66-99(A) and/or (B)] Yes No N/A

TANK SYSTEM - WASTE ANALYSIS REQUIREMENTS

10. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following:[3745-66-100]
- a. Conducted waste analysis and trial treatment or storage tests?[3745-66-100(A)]; OR
- b. Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-100(B)] Yes No N/A

TANK SYSTEMS REQUIREMENTS

11. Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)?[3745-66-92(A)] Yes No N/A

NOTE: You should review the file to see if the written assessment has been previously reviewed and what the results were.

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12. Does the written assessment include the following:[3745-66-92(A)]
- | | | | | | | |
|---|-----|--------------------------|----|-------------------------------------|-----|--------------------------|
| a. Certification by an independent registered, professional engineer?[3745-66-92(A)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| b. Consideration of the design standards of the system?[3745-66-92(A)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| c. Consideration of the hazardous characteristics of the waste(s)?[3745-66-92(A)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| d. An evaluation by a corrosion expert (only if the external system/components are metal and in contact with soil or water)?[3745-66-92(A)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| e. A determination of design and operational measures that will be needed to protect the tank system from potential damage (only for underground tank components)?[3745-66-92(A)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| f. Design considerations to ensure that the tank foundations will maintain the load of a full tank?[3745-66-92(A)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| g. Design considerations for anchoring the unit to prevent floatation (only for tanks situated in a seismic fault zone or saturated zone)?[3745-66-92(A)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| h. Design considerations to ensure that the tank system will withstand the effects of frost heave(only for underground tank systems)?[3745-66-92(A)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |

NOTE: CO-DHWM Engineering staff are available to assist you with evaluation of the written assessment.

13. Are there written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed?[3745-66-92(G)]
- | | | | | | |
|-----|--------------------------|----|--------------------------|-----|--------------------------|
| Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
|-----|--------------------------|----|--------------------------|-----|--------------------------|
- Do the written statements address all of the following:
- | | | | | | | |
|--|-----|--------------------------|----|--------------------------|-----|--------------------------|
| a. Inspection for damage and/or inadequate construction and installation was conducted?[3745-66-92(B)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| b. Statement that deficiencies were corrected before the tank system was covered or put into use?[3745-66-92(B)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| c. Proper backfilling?[3745-66-92(C)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| d. Tightness test; if the tank system was found not to be tight, does the statement indicate that proper repairs were made?[3745-66-92(D)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| e. Proper support and protection of ancillary equipment?[3745-66-92(E)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| f. Supervision of the installation of field fabricated corrosion protection?[3745-66-92(F)] | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

SECONDARY CONTAINMENT

14. Has secondary containment been provided? Yes No N/A

NOTE: All tank systems must have secondary containment at this point, except for tank systems that store/treat materials that become hazardous waste after January 12, 1987, must have secondary containment required within the time intervals in [3745-66-92(A)(1)] to (A)(4). The date the material became a hazardous waste must be used in place of January 12, 1987.[3745-66-92(A)(5)]

15. Is secondary containment one of the following:
- | | | | | | |
|-----|--------------------------|----|-------------------------------------|-----|--------------------------|
| Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
|-----|--------------------------|----|-------------------------------------|-----|--------------------------|
- a. An **External Liner**? [3745-66-93(E)(1)] If so,
- | | | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|
| Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> | |
| i. Is liner designed or operated to contain 100% of the capacity of the largest tank? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| iii. Is liner free of cracks and gaps? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| iv. Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| v. Are chemically resistant water stops in place at all points? (concrete liners only) | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| vi. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? (concrete liners only) | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
- b. **Vault System**? [3745-66-93(E)(2)] If so,
- | | | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|--------------------------|--------------------------|
| Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> | |
| i. Is vault system designed to contain 100% of the capacity in the largest tank? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| iii. Are chemically resistant water stops in place at all points? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| iv. Is there a compatible interior coating to prevent migration into the concrete? | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |

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- v. For ignitable or reactive waste: Is the vault system provided with means to prevent (or alternatively "protect against") the formation or ignition of vapors? Yes No N/A
- vi. Is vault system provided with an exterior moisture barrier? Yes No N/A
- c. **Double-Walled Tank?** [3745-66-93(E)(3)] If so,
 - i. Is double-walled tank designed as an integral structure to contain any release from the inner tank? Yes No N/A
 - ii. If metal, are the primary tank interior and outer shell exterior surfaces protected from corrosion? Yes No N/A
 - iii. Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time? Yes No N/A
- d. **An Equivalent Device?** As described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D&E)] Yes No N/A

SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION

- 16. Has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, groundwater, or surface water and is it capable of detecting and collecting releases and accumulated liquids?[3745-66-93(B)(1) and (2)] Yes No N/A
- 17. Does the secondary containment system meet the following minimum requirements of [3745-66-93(C)]:
 - a. Constructed or lined with compatible materials of sufficient strength to prevent failure?[3745-66-93(C)(2)] Yes No N/A
 - b. Placed on a foundation or base capable of providing support?[3745-66-93(C)(2)] Yes No N/A
 - c. Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time?[3745-66-93(C)(3)] Yes No N/A
 - d. Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation?[3745-66-93(C)(4)] Yes No N/A
 - e. Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner?[3745-66-93(C)(4)] Yes No N/A

ANCILLARY EQUIPMENT REQUIREMENTS

- 18. Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)? Yes No N/A
- If not, is the ancillary equipment one of the following: [3745-66-93(F)]
 - a. Above ground piping (exclusive of flanges, joints, valves and connections) that is inspected daily? Yes No N/A
 - b. Welded flanges, welded joints and/or welded connections that is inspected daily? Yes No N/A
 - c. Sealless or magnetic coupling pumps and/or sealless valves? Yes No N/A
 - d. Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown and/or loss of pressure-actuated shut-off devices) that is inspected daily? Yes No N/A

TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE

- 19. Has there been a leak or spill from any tank system or has any tank system been found unfit for use? If so, did the o/a: Yes No N/A
- NOTE: If the tank is found to be unfit for use, inspector should explain why.
 - a. Immediately cease flow of material into tank and investigate the cause of the release?[3745-66-96(A)] Yes No N/A
 - b. Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time?[3745-66-96(B)(1)] Yes No N/A
 - c. Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment?[3745-66-96(B)(2)] Yes No N/A
 - d. For a visible release to the environment, immediately conduct a visual inspection of the release?[3745-66-96(C)] Yes No N/A
 - e. For a visible release to the environment, prevent further migration of the leak or spill to soils or surface waters?[3745-66-96(C)] Yes No N/A
 - f. For a visible release to the environment, properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)] Yes No N/A
 - g. Report any release to the environment to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)] Yes No N/A

- h. For a release to the environment, submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)] Yes No N/A
- i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)(2)] Yes No N/A
- j. For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)] Yes No N/A

NOTE: The requirements noted in 20.j, do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.

20. In the event that the repairs to the tank system were major (e.g., replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from an independent, registered P. E. attesting that the repaired unit is capable of handling hazardous waste? [3745-66-96(F)] Yes No N/A
21. Was a copy of the certification submitted to the director within seven days after returning the system to use? [3745-66-96(F)] Yes No N/A
22. If the o/o was unable to repair and return the unit to service as described in 20.a through 20.e, was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)] Yes No N/A
23. Does the o/o have a tank system with a variance from secondary containment from which a release has occurred but has not migrated beyond the zone of engineering control? If so, Yes No N/A
- a. Has the o/o complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G)(3)] Yes No N/A
- b. If soils cannot be decontaminated/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)] Yes No N/A
24. Does the o/o have a tank system with a variance from secondary containment from which a release occurred and has migrated from the zone of engineering control? If so, Yes No N/A
- a. Has the o/o complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)] Yes No N/A
- b. If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(4)] Yes No N/A

POLLUTION PREVENTION

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

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

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

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

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

1. Has the company undertaken any P2 activities to reduce the amount of waste generated? Yes No N/A RMK#
 - a. If so, what has the company done to minimize waste generation?
 - A change in the process resulting in less waste.
 - A change in the product resulting in less waste.
 - Use of fewer and less toxic hazardous raw materials.
 - Better operations/improved housekeeping.
 - On-site recycling/reuse of hazardous materials.
 - Sending waste off-site for recycling/reuse.
 - Other activities (specify):

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

- Solvents
- Paint related wastes
- Industrial process wastes (sludges, slags, contaminated wastes waters, etc.)
- Contaminated oils/hydraulic fluids
- Off-spec chemicals
- Shop rags
- Other (specify):

- Waste water
- Solid waste (paper, plastic, metal, wood, blasting material)
- Air emissions
- Energy use
- Fluorescent light bulbs
- Used batteries

c. If they haven't minimized waste are there barriers that are preventing them from doing it?

- Lack of information about practical alternatives.
- Lack of capital to make process changes.
- Lack of internal management support.
- The company does not generate enough waste to consider P2.
- Other reason given (specify):

2. Does the company plan to do P2 activities in the future? Yes ___ No ___ N/A ___ RMK#

3. Would the company be interested in receiving additional information from Ohio EPA about P2? ___ Yes ___ No ___ N/A RMK#

4. Did you give the company information about P2 during the inspection? ___ Yes ___ No N/A ___ RMK#

5. Would the company like a P2 assessment? ___ Yes ___ No ___ N/A RMK#

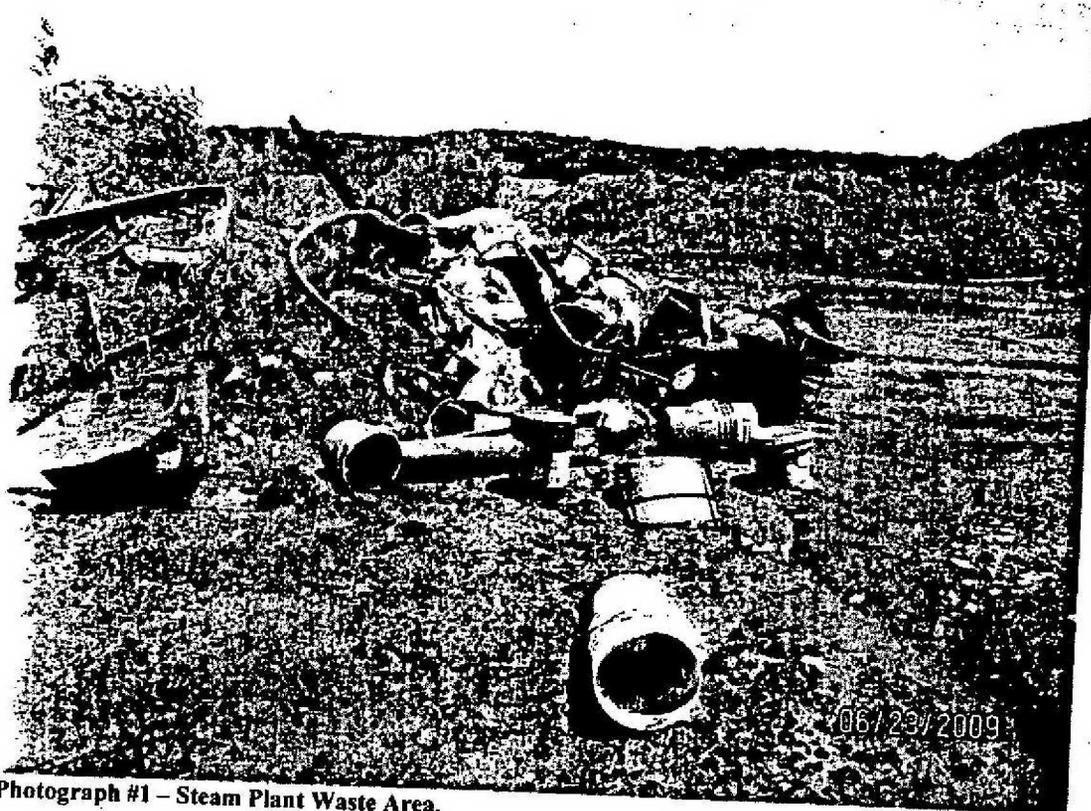
A. If yes, provide information that makes the company a good candidate for an assessment (i.e., known specific P2 opportunities exist, the company is willing to cooperate and commit resources to the assessment, the company fully understands DHWM's P2 assessment process, etc.)

B. If no, list the reasons the facility representative gave for not wanting an assessment.

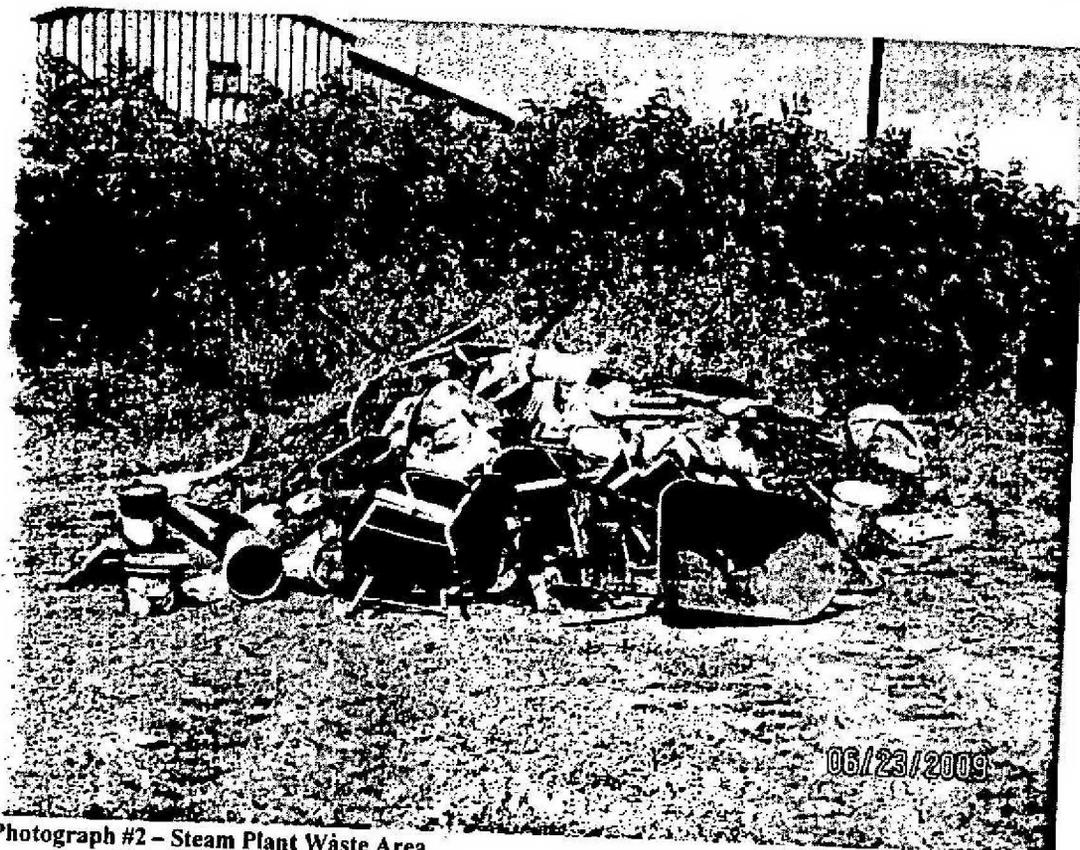
If the company would like a P2 assessment done at their facility, the inspector must give the company representative a copy of the Pollution Prevention Assessments for Hazardous Waste Generators document and discuss it with them (Attachment III of the P2 Assessment Procedures Manual at: <http://www.epa.state.oh.us/dhwm/pdf/P2AssesmentHWGeneraotr's.pdf>).

REMARKS

US Enrichment Corporation Portsmouth
Gaseous Diffusion Plant
Piketon, Ohio
6/23/2009

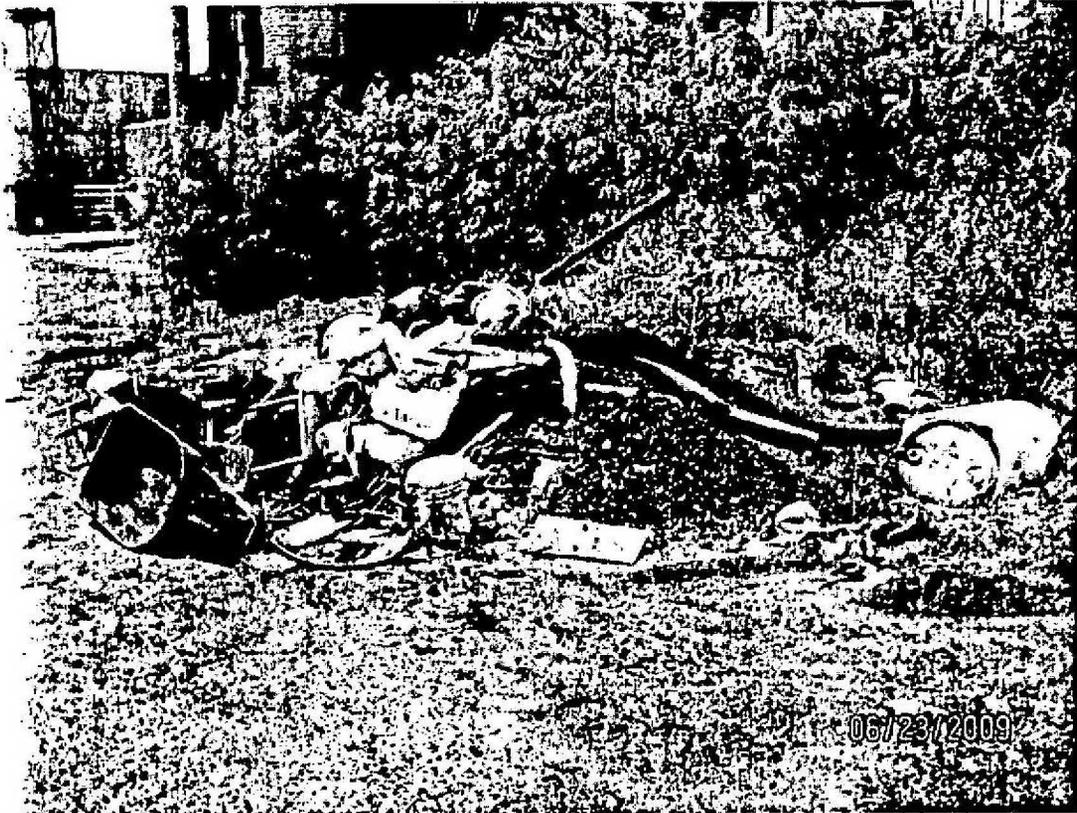


Photograph #1 - Steam Plant Waste Area.

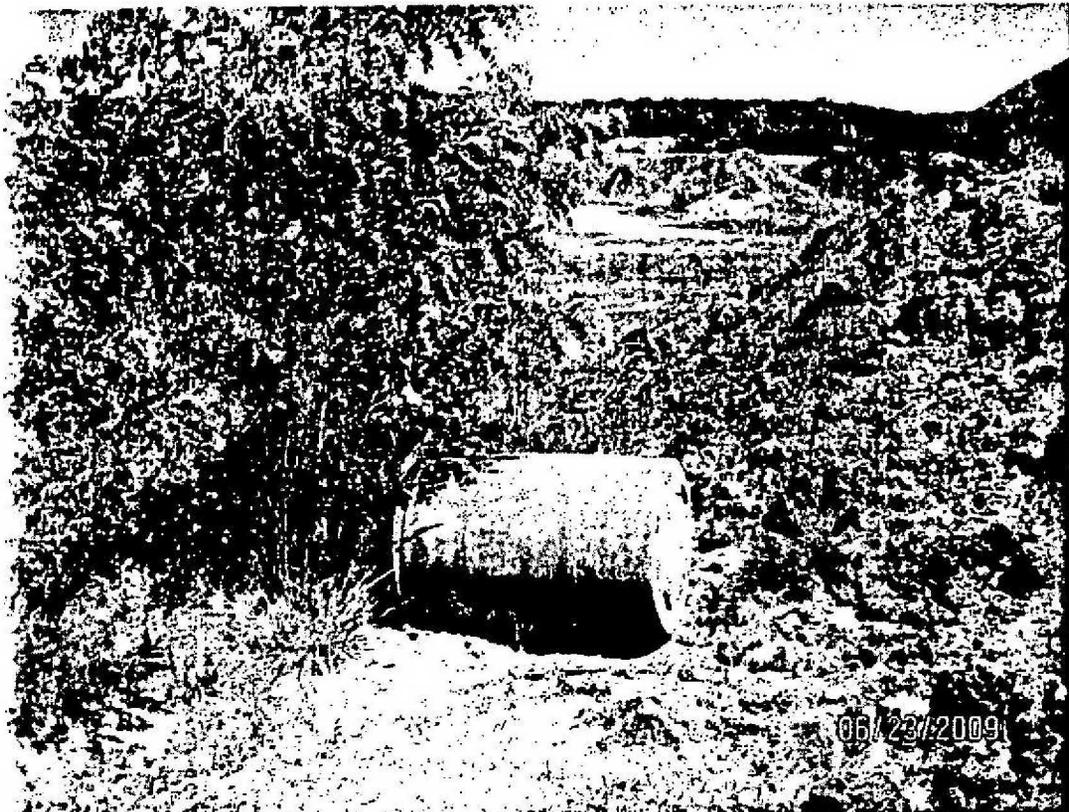


Photograph #2 - Steam Plant Waste Area.

US Enrichment Corporation Portsmouth
Gaseous Diffusion Plant
Piketon, Ohio
6/23/2009



Photograph #3 - Steam Plant Waste Area.



Photograph #4 - Steam Plant, 55- Gallon plastic container.

US Enrichment Corporation Portsmouth
Gaseous Diffusion Plant
Piketon, Ohio
6/23/2009



Photograph #5 - Steam Plant, Rusty 55-Gallon Container.



Photograph #6 - Steam Plant, Rusty 55- Gallon Container.