



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

United States  
Enrichment  
Corp

RECEIVED

DEC 20 2007

REPLY TO THE ATTENTION OF:  
Ohio Environmental  
Protection Agency  
Pike County District

DEC 18 2007

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Ms. Pamela Potter  
Manager  
Waste Management/Environmental Compliance/Industrial Safety  
United States Enrichment Corporation  
Portsmouth Gaseous Diffusion Plant  
P.O. 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. Potter:

On August 7th through August 9th, 2007, representatives of the United States Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) inspected the United States Enrichment Corporation (USEC) facility located near 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, U.S. EPA has determined that USEC is engaged in storage of hazardous waste without a permit, and 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) In order to avoid the need for a hazardous waste storage permit, a large quantity generator that is placing waste in containers must comply with OAC Rules 3745-66-70 to 3745-66-77. See, OAC Rule 3745-52-34. A container holding hazardous waste shall not be opened, handled or stored in a manner which may rupture the container or cause it to leak. See, OAC Rule 3745-66-73(B) [40 CFR § 265.173(b)].

During the inspection of the heavy metal precipitation and filtering unit in Building X-705, the inspectors observed hazardous waste that had fallen off of the filter paper on to the floor. At the time of the inspection, USEC had not appropriately maintained the container of hazardous waste at the heavy metal precipitation filtration unit. USEC, therefore, failed to comply with the above-mentioned condition for a storage licensee exemption, and violated the storage facility container requirement.

- 2) 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 Building X-720C, the inspectors observed open containers of adhesive and various leaking containers. Also, in Building X-720, the inspectors observed four 5-gallon containers marked corrosive in the motor winding area, and, in Building X-760, the inspectors observed two 55-gallon containers labeled "Calgon". USEC had not made waste determinations on these materials. USEC, therefore, violated the above-referenced generator requirement.

- 3) Except as provided in paragraphs (A)(1) to (A)(4) of this rule, Rules 3745-279-20 to 3745-279-24 of the OAC apply to all used oil generators. See, OAC Rule 3745-279-20(A). Used oil generators are subject to all applicable spill prevention, control and countermeasures (40 CFR Part 112) in addition to the requirements of Rules 3745-279-20 to 3745-279-24 of the Administrative Code. See, OAC Rule 3745-279-22. Upon detection of a release of used oil to the environment not subject to the requirements of Chapter 1301:7-9 of the OAC which has occurred after the first effective date of Chapter 3745-279 of the OAC, a generator shall perform the following cleanup steps:
  - 1) Stop the release;
  - 2) Contain the released used oil;
  - 3) Clean up and manage properly the released used oil and other materials; and
  - 4) If necessary to prevent future releases, repair or replace any leaking used oil storage containers or tanks prior to returning them to service. See, OAC Rule 3745-279-22(D).

At the time of the inspection of Building X-744J, the inspectors observed an old Kenworth truck parked outside, which appeared to have leaked used oil on the concrete pad. USEC had not cleaned up or managed the released used oil.

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., Eaton

forklift #16-0290). USEC should develop a Standard Operating Procedure 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).

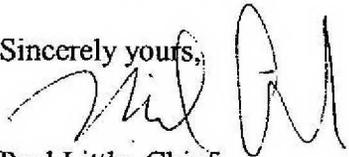
A large quantity generator who accumulates hazardous waste on-site for 90 days or fewer and who does not meet the conditions for a permit exemption of OAC Rule 3745-52-34, and U.S. EPA Subpart CC conditions of 40 CFR § 262.34(a)(1)(i), is an operator of a hazardous waste storage facility, and is required to apply for and obtain an Ohio hazardous waste storage permit and a U.S. EPA Subpart CC storage permit. See, OAC 3745-52-34(A), 3745-50-41(A), 3745-50-45(A).

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

You should submit your response to Walt Francis, United States 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 yours,

  
Paul Little, Chief  
Compliance Section # 2  
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: 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: August 7th through August 9th, 2007

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

8/27/07  
Date

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

8-29-07  
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) Inspectors -  
Melody Stewart, Hazardous Waste Inspector  
Maria Galanti, Site Coordinator

Representatives of USEC and USEC, Inc. -  
Gary Coriell, Environmental Engineer  
Paul McGoren, Environmental Engineer  
Greg Fout, ACP Environmental Compliance, Project Manager

### **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 TSDs 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. During the past year, numerous shipments of hazardous waste were manifested off-site by both U.S. DOE and USEC. This is due to an increase in treatment capacity at off-site commercial treatment facilities and U.S. DOE treatment facilities, the lifting of the moratorium, and the execution of the site treatment plans for U.S. DOE and USEC. U.S. DOE sends some waste off-site (to U.S. DOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to U.S. DOE - Portsmouth for storage in the interim prior to their final disposal.

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.

### **Opening Conference**

On August 7, 2007, U.S. EPA representative Walt Francis and Ohio EPA representatives Melody Stewart and Maria Galanti met with Mr. Gary Coriell and Mr. Paul McGoren 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. Mr. Gary Coriell allowed the inspectors access to the facility to conduct the inspection.

### **Site Tour**

The walk-through began in Building X-705 where USEC maintains a less than 90 day accumulation area, several satellite accumulation areas (SAAs), and one universal waste staging area. Prior to entering the controlled area of Building X-705, the inspectors, Mr. Coriel and Mr. McGoren 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. The walkthrough continued to the 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 one 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 a container of oil and water sludge from the X-530 Switchyard in this area. The walkthrough 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 several one and five gallon containers of floor tile adhesive that were open. In addition, the inspectors observed several paint containers that were leaking or had leaked. Also, in Building X-720C, USEC stores various oils and used oil. The inspection continued in Building X-720, where the inspectors observed an area with two lead acid batteries and four 5-gallon containers of corrosive. Outside of Building X-720, the inspectors observed a 55-gallon container on a wooden pallet that was not marked. The walkthrough continued to Building X-760 where the inspectors observed one SAA and two 55-gallon containers of Calgon S-49. The inspectors were told that these containers had been in Building X-760 since 1993. The walkthrough continued at Building X-710 where the inspectors met Mr. Steve Wamsley. 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 113, 144, 216, 212, 263, 257, and 254. 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. The walkthrough continued at Building X-344A and Building X-344B. The inspectors returned to Building XT-847, where USEC maintains several less than 90 day accumulation areas, SAAs, used oil area, and a universal waste staging area.

On August 7, 2007, the inspectors continued the inspection and returned to Building X-720 to meet with Ms. Beverley Kelley, and discussed the four containers of sodium hydroxide in the motor test cleaning area. The walkthrough continued at Building X-326, where the inspectors met Ms. Vicki Glenn. In Building X-326, USEC maintains several 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 several areas for less than 90 day hazardous waste accumulation, SAAs and universal waste staging areas. The walkthrough continued at Building X-333 where USEC maintains several areas for less than 90 day hazardous waste accumulation, SAAs and universal waste staging areas. The walkthrough continued to Building X-744J, where we met Ms. Didi Hannah. In Building X-744J the inspectors observed seventy-two 30-gallon containers of Freon Refrigerant 11, and a rusty 55-gallon container, and a corroded container of "HTH Oxidizer". The inspectors also observed a Kenworth truck outside of Building X-774J that appears to have leaked crankcase oil. The walkthrough continued to the X-801 Scrapyard and then to Warehouse 9 where USEC accumulates lead acid batteries prior to off-site shipment.

The inspectors then returned to Building XT-847 to review records.

On August 8th, 2007, the inspectors met with Mr. Greg Fout who gave the inspectors a walkthrough of Building X-3012, X-7721, and X-7725, where USEC, Inc. maintains several SAA and universal waste accumulation areas.

### **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 an August July 25, 2006, 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 less than 90 day hazardous waste accumulation area in Building X-705, a container in a less than 90 day hazardous waste accumulation area in Building X-700 that had the wrong U.S. EPA ID number on the hazardous waste label, a container stored in Building X-744J, an unmarked 55-gallon container outside of Building X-720, and several containers in Building X-720C that were leaking or stored open.

### **Attachments**

Inspection Checklists.

**HAZARDOUS WASTE GENERATOR  
INSPECTION CHECKLIST**

Company: Portsmouth Gaseous Diffusion Plant EPA ID#: OHD 987 054 723

Street: 3930 U.S. Route 23 South City: Piketon

County: Pike State: Ohio Zip: 45661

Mailing Address: PO Box 628, Piketon, Ohio 45661  
(If different from above)

Telephone: 740-897-5303 Fax #: 740-897-0700

Owner/Operator: United States Enrichment Corporation  
(If different from above)

Street: Same as above

City: \_\_\_\_\_ State: Ohio Zip: \_\_\_\_\_

Inspection Date(s): 8/6/07 - 8/8/07 Time(s): 8:00 am - 5:00 pm

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

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>Melody Stewart</u>	<u>OEPA</u>	<u>740-380-5256</u>
	<u>Walt Francis</u>	<u>U.S. EPA</u>	<u>312-353-4921</u>
Facility Representative:	<u>Gary Coriell</u>	<u>USEC</u>	<u>740-897-2260</u>
	<u>Paul McGoron</u>	<u>USEC</u>	<u>740-897-2256</u>
	<u>Carolyn Hamilton</u>	<u>USEC</u>	<u>740-897-4027</u>

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

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

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

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

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

**COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

## POLLUTION PREVENTION

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

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

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

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

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

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

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

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

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

- Solvents
- Paint related wastes
- Industrial process wastes (sludges, slags, contaminated waste waters, etc)

- Contaminated oils/hydraulic fluids
- Off-spec chemicals
- Fluorescent light bulbs
- Used batteries
- Shop rags
- Other (specify): \_\_\_\_\_

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

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

2. Does the company plan to do P2 activities in the future? Yes  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#

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

6. If the company does not want a P2 assessment, why not?

**REMARKS**

**LAR QUANTITY GENERATOR REQUIREMENTS**

**GENERAL REQUIREMENTS**

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

**WASTE IMPORT/EXPORT REQUIREMENTS**

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

**GENERATOR CLOSURE REQUIREMENTS**

- 5. Has the generator closed any <90-day accumulation unit(s) since the date of the last inspection? If so:
  - a. Describe the unit(s) which the generator has closed.

Yes \_\_\_ No  N/A \_\_\_ RMK#

b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]

Yes

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

No

N/A

RM

K#

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

**REMARKS**

## MANIFEST REQUIREMENTS

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

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

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

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

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

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

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

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

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

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

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

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

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

a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)]

Yes

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

Yes \_\_\_ No  N/A \_\_\_ RMK#

No

N/A

RM

K#

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

Yes  No  N/A \_\_\_ RMK#

REMARKS

**PERSONNEL TRAINING**

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

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

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

a. Procedures for use in inspecting, repairing and replacing emergency and monitoring equipment?

Yes

b. Key parameters for automatic waste feed cut-off systems?

Yes  No  N/A \_\_\_ RMK#

No

N/A

RM

K#

c. Communication or alarm system?

Yes  No  N/A \_\_\_ RMK#

d. Response procedures for fire/explosions?

Yes  No  N/A \_\_\_ RMK#

e. Response to groundwater contamination incidents?

Yes  No  N/A \_\_\_ RMK#

f. Shutdown procedures?

Yes  No  N/A \_\_\_ RMK#

5. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]

Yes  No  N/A \_\_\_ RMK#

6. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]

Yes  No  N/A \_\_\_ RMK#

7. Does the generator provide annual refresher training to employees? [3745-65-16(C)]

Yes  No  N/A \_\_\_ RMK#

8. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)]

Yes  No  N/A \_\_\_ RMK#

9. Are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]

Yes  No  N/A \_\_\_ RMK#

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

Job Performed

Name of Employee

Date(s) Trained

REMARKS

# CONTINGENCY PLAN

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

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

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

## EMERGENCY COORDINATOR

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

*Steve May - Primary contact*

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

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

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

**REMARKS**

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

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

REMARKS

## GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)] Yes  No  N/A \_\_\_ RMK#

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

2. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? Yes  No  N/A \_\_\_ RMK#
  - b. Are under the control of the operator of the process generating the waste? Yes  No  N/A \_\_\_ RMK#
  - c. Do not exceed a total of 55 gallons of hazardous waste? Yes  No \_\_\_ N/A \_\_\_ RMK#
  - d. Do not exceed one quart of acutely hazardous waste at any one time? Yes  No  N/A \_\_\_ RMK#
  - e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? Yes  No  N/A \_\_\_ RMK#

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

3. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so: Yes \_\_\_ No  N/A \_\_\_ RMK#
- a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? Yes \_\_\_ No  N/A  RMK#
  - b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? Yes \_\_\_ No  N/A  RMK#

## USE AND MANAGEMENT OF CONTAINERS

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

Yes  Is the accumulation date on each container? [3745-52-34(A)(2)]

Yes  No  N/A  RMK#

No   
N/A

RMK#  
K#  
5.

6. Are hazardous wastes stored in containers which are:

a. Closed (except when adding/removing wastes)? [3745-66-73(A)]

Yes  No  N/A  RMK#

b. In good condition? [3745-66-71]

Yes  No  N/A  RMK#

c. Compatible with wastes stored in them? [3745-66-72]

Yes  No  N/A  RMK#

d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]

Yes  No  N/A  RMK#

7. Is the container accumulation area(s) inspected weekly? [3745-66-74] (Note location in general information section of checklist)

Yes  No  N/A  RMK#

a. Are inspections recorded in a log or summary? [3745-66-74]

Yes  No  N/A  RMK#

8. For ignitable and/or reactive hazardous waste(s):

a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]

Yes  No  N/A  RMK#

b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)]

Yes  No  N/A  RMK#

#### PRE-TRANSPORT REQUIREMENTS

#1 - Building X - 705, heavy metal present on floor + lid of container.

9. Does the generator pack/relabel its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] Yes  No  N/A  RMK# 2
10. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes  No  N/A  RMK#
11. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes  No  N/A  RMK#

E:\USDOEP\portsmouth\checklists\USECLQG2006.wpd

REMARKS

H2-55-GAL container in Building X-700, wrong ID number.

**LARGE QUANTITY UNIVERSAL WASTE  
HANDLER INSPECTION CHECKLIST**

Company: Portsmouth Gaseous Diffusion Plant USEPA ID#: OHD 987 054 723

Street: 3930 U.S. Route 23 South City: Piketon

County: Pike State: Ohio ZIP: 45661

Mailing  
Address PO Box 628, Piketon, Ohio 45661  
(IF DIFFERENT FROM ABOVE)

Telephone: (740)897-5303 Fax: (740)897-0700

Owner/  
Operator: United States Enrichment Corporation  
(IF DIFFERENT FROM ABOVE)

Street: Same as above

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Inspection Date(s): 8/6/07 - 8/8/07 Time(s): 8:00 am - 5:00 pm

Inspection Announced?  YES  NO If so, how much advance notice given? ~~2 days~~

Inspectors: Melody Stewart, OEPA and Walt Francis, U.S. EPA

Facility  
Rep(s): Gary Coriell, USEC

Paul McGoron, USEC

WASTE MANAGEMENT ACTIVITY	
<input checked="" type="checkbox"/>	Containers
<input type="checkbox"/>	Tank(s)
<input type="checkbox"/>	Other (specify)

**Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more**  
**Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less**

**LARGE QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS**

**GENERAL REQUIREMENTS**

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

**PROHIBITIONS**

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

**WASTE MANAGEMENT AND LABELING/MARKING**

**UNIVERSAL WASTE BATTERIES:**

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

g. Remove the electrolyte from the battery?

Yes  No  N/A  RMK#  
No [3745-273-33(A)(2)]

N/A

RMK#

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

Yes  No  N/A  RMK#

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

Yes  No  N/A  RMK#

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

Yes  No  N/A  RMK#

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

Yes  No  N/A  RMK#

**UNIVERSAL WASTE PESTICIDES**

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

Yes  No  N/A  RMK#

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

Yes  No  N/A  RMK#

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

Yes  No  N/A  RMK#

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

Yes  No  N/A  RMK#

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

Yes  No  N/A  RMK#  
No   
N/A   
RM   
K#

14.

**UNIVERSAL WASTE THERMOSTATS**

15. Are thermostats that show evidence of leakage, spillage or damage that could cause leaks, properly contained? [3745-273-33(C)(1)]  Yes  No  N/A  RMK#
16. If the thermostats are contained, are the containers closed, structurally sound, compatible with contents of the thermostats and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(C)(1)] Yes  No  N/A  RMK#
17. If the mercury-containing ampules are removed, does the LQUWH: [3745-273-33(C)(1)]
- a. Remove the ampules in a manner to prevent breakage and is the removal done over a containment device? [3745-273-33(C)(2)(a)(b)] Yes  No  N/A  RMK#
- b. Have a clean-up system readily available to transfer spilled material to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-33(C)(2)(c)(d)] Yes  No  N/A  RMK#
- c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-33(C)(2)(e)] Yes  No  N/A  RMK#
- d. Ensure employees are thoroughly familiar with proper waste handling and emergency procedures? [3745-273-33(C)(2)(f)] Yes  No  N/A  RMK#
- e. Ensure removed ampules are stored in closed, non-leaking containers that are in good condition? [3734-273-33(C)(2)(g)] Yes  No  N/A  RMK#

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

Yes  No  N/A  RMK#  
No  N/A  RMK#

RMK#

18.

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

Yes  No  N/A  RMK#

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

Yes  No  N/A  RMK#

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

Yes  No  N/A  RMK#

**ACCUMULATION TIME**

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

Yes  No  N/A  RMK#

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

Yes  No  N/A  RMK#

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

21. Has the length of time the universal waste has been accumulated documented by one of the following: [3745-273-35(C)]  Yes  No  N/A \_\_\_ RMK#

a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-35(C)(1)] Yes  No \_\_\_ N/A \_\_\_ RMK#

b. Marking or labeling the individual item of universal waste with the date that it became a waste or was received? [3745-273-35(C)(2)] Yes  No \_\_\_ N/A \_\_\_ RMK#

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

Yes  No  N/A  RMK#  
d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-35(C)(4)]

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

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

**RESPONSE TO RELEASES**

23. Were releases of universal waste and other residues immediately contained? [3745-273-37(A)]

Yes  No  N/A  RMK#

24. Was the released material characterized? [3745-273-37(B)]

Yes  No  N/A  RMK#

25. If the released material was a hazardous waste, was it managed as required in OAC 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-37(C)]

Yes  No  N/A  RMK#

**OFF-SITE SHIPMENTS**

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

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

Yes  No  N/A  RMK#

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

27. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-38(C)] Yes  No  N/A  RMK#
28. Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)] Yes  No  N/A  RMK#
29. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-38(E)(1)] Yes  No  N/A  RMK#
- b. Agree to where shipment will be sent? [3745-273-38(E)(2)] Yes  No  N/A  RMK#
30. If a handler rejects a partial or full load from another handler, does the receiver handler contact the originating handler and discuss one of the following:
- a. Sending the waste back to originating handler? [3745-273-38(F)(1)] Yes  No  N/A  RMK#
- b. Sending the shipment to a destination facility? [3745-273-38(F)(2)] Yes  No  N/A  RMK#
31. If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)] Yes  No  N/A  RMK#
32. If the handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-38(H)] Yes  No  N/A  RMK#

**TRACKING UNIVERSAL WASTE SHIPMENTS**

33. 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).**

34. 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#
35. Is universal waste shipped to another handler? If so: Yes \_\_\_ No  N/A \_\_\_ RMK#  
a. Is a record of each shipment kept? [3745-273-39(B)] Yes \_\_\_ No  N/A  RMK#

36. 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#
37. Are records kept for three years? [3745-273-39(C)(1)(2)] Yes \_\_\_ No  N/A \_\_\_ RMK#

**EXPORTS**

38. 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 and 3745-52-57, and paragraphs (A)(1) - (A)(6) and (B) of 3745-52-56? [3745-273-40(A)]

Yes

No

N/A

RM

K#

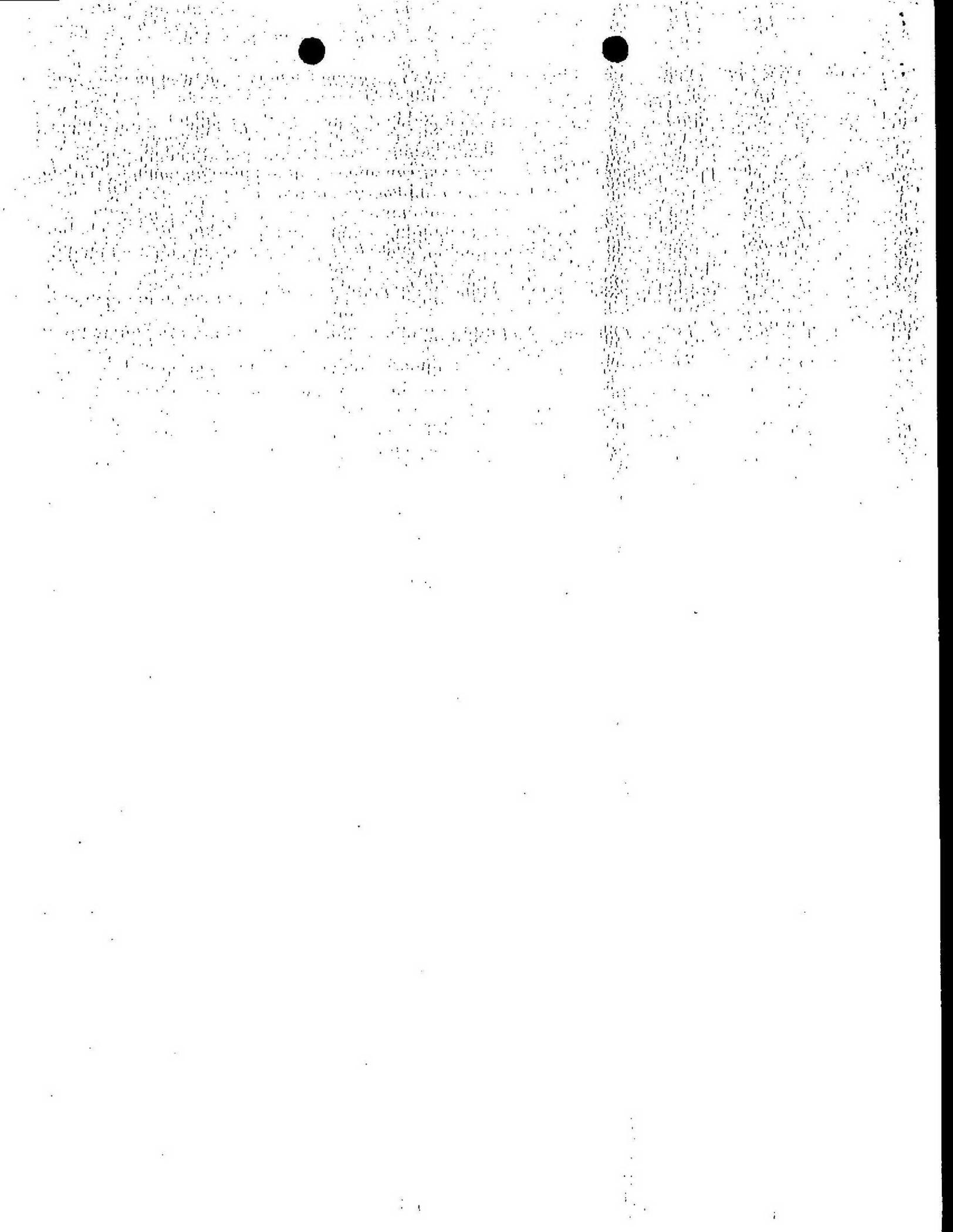
b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA "Acknowledgment of Consent" 3745-52-50 to -52-57? [3745-273-40(B)]

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

Company: Portsmouth Gaseous Diffusion Plant EPA I.D.: OHD 987 054 723

Street: 3930 U.S. Route 23 South City: Piketon

County: Pike State: Ohio Zip: 45661

Mailing Address: \_\_\_\_\_  
(IF DIFFERENT FROM ABOVE)

Telephone: 740-897-2260 (Gary Coriell) Fax: \_\_\_\_\_

Owner/ Operator: United States Enrichment Corporation  
(IF DIFFERENT FROM ABOVE)

Street: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Inspection Date(s): 8/6/07 - 8/8/07 Time(s): 8:00 am - 5:00 pm

Inspection announced? Yes  No  If so, how much advance notice given? 2 days

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>Walt Francis</u>	<u>U.S. EPA</u>	<u>312-353-4921</u>
	<u>Melody Stewart</u>	<u>Ohio EPA</u>	<u>740-380-5256</u>
Facility Rep(s):	<u>Gary Coriell</u>	<u>USEC</u>	<u>740-897-2260</u>
	<u>Paul McGoron</u>	<u>USEC</u>	<u>740-897-2256</u>

## USED OIL MANAGEMENT ACTIVITY

<input checked="" type="checkbox"/> Generator/Collection Center/Aggregation	<input type="checkbox"/> Marketer
<input type="checkbox"/> Transporter/Transfer Facility	<input type="checkbox"/> Off-Spec Burner
<input type="checkbox"/> Processor/Re-Refiner	<input type="checkbox"/> Other (specify)
<input type="checkbox"/> No Generation	

## PROHIBITIONS

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

## USED OIL GENERATOR STANDARDS

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

10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so:

Yes  
No  
N/A  
RMK  
#

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

Yes \_\_\_ No  N/A \_\_\_ RMK#

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

Yes \_\_\_ No  N/A  RMK#

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

Yes \_\_\_ No  N/A  RMK#

11. Does the generator have the used oil hauled only by transporters that have obtained an EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24]

Yes  No  N/A \_\_\_ RMK#

#### USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]

Yes \_\_\_ No  N/A  RMK#

13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]

Yes \_\_\_ No  N/A \_\_\_ RMK#

14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]

Yes \_\_\_ No  N/A \_\_\_ RMK#

#### WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11]

Yes  No  N/A \_\_\_ RMK#

REMARKS

**USED OIL TRANSPORTER AND TRANSFER FACILITIES**

16. Does the used oil transporter process used oil? [3745-279-41(A)] If so: Yes \_\_\_ No \_\_\_ N/A  RMK#
- Is the used oil transporter in compliance with the requirements for processors/re-refiners in 3745-279-50 to 3745-279-59 (except as provided in 3745-279-41(B) and (C))? [3745-279-41(A)] Yes \_\_\_ No  N/A \_\_\_ RMK#
17. Has the used oil transporter notified Ohio EPA or U.S. EPA and obtained an EPA ID#? [3745-279-42(A)] Yes \_\_\_ No  N/A \_\_\_ RMK#
18. Has the used oil transporter delivered all used oil to:
- a. Another used oil transporter that has an EPA ID#? [3745-279-43(A)(1)] Yes \_\_\_ No  N/A \_\_\_ RMK#
  - b. A used oil processing/re-refining facility that has an EPA ID#? [3745-279-43(A)(2)] Yes \_\_\_ No  N/A \_\_\_ RMK#
  - c. An off-spec used oil burning facility that has an EPA ID#? [3745-279-43(A)(3)] Yes \_\_\_ No  N/A \_\_\_ RMK#
  - d. An on-spec used oil burning facility? [3745-279-43(A)(4)] Yes \_\_\_ No  N/A \_\_\_ RMK#
19. Has the used oil transporter complied with all applicable USDOT regulations (49 CFR 171 to 180)? [3745-279-43(B)] Yes \_\_\_ No  N/A \_\_\_ RMK#
20. Has the used oil transporter had a discharge of used oil? If so: Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK#
- Did they take the appropriate action as outlined in 3745-279-43(C)? Yes \_\_\_ No  N/A \_\_\_ RMK#
21. Has the used oil transporter determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? [3745-279-44(A)] Yes \_\_\_ No  N/A \_\_\_ RMK#
22. Does the transporter retain all records of analyses and information used to comply with 3745-279-44 for at least three years? [3745-279-44(A)] Yes \_\_\_ No  N/A \_\_\_ RMK#
23. Does the owner/operator of a used oil transfer facility:

- Yes  
No  
  
N/A  
RMK  
#
- a. Stored used oil tanks, containers, or units subject to regulation under 3745-54 to 3745-57 or 3745-65 to 3745-69? [3745-279-45(B)]
- b. Stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-45(C)]
- c. Provide secondary containment for containers used to store used oil as required by 3745-279-45(D)? [3745-279-45(D)]
- d. Provide secondary containment for existing aboveground tanks required by 3745-279-45(E)? [3745-279-45(E)]
- e. Provide secondary containment for new aboveground tanks as required by 3745-279-45(F)? [3745-279-45(F)]
- f. Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil?" [3745-279-45(G)]
- g. Upon detection of a release of used oil: [3745-279-45(H)]
- i. Stopped the release?
- ii. Contained the release?
- iii. Cleaned up and managed the used oil and other materials?
- iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary?
24. Does the used oil transporter keep a record of each shipment of used oil? [3745-279-46(A)]
- a. Does each record include the name and address of the generator, transporter or processor/re-refiner who provides the used oil for transport? [3745-279-46(A)(1)]
- b. Does each record include the EPA ID# of the generator, transporter or processor/re-refiner (if applicable) that provides the used oil for transport?
- Yes \_\_\_ No  N/A \_\_\_ RMK#



- Yes  
No  
 N/A  
RMK #
- c. Does each record include the quantity of used oil accepted? [3745-2679-46(A)(3)] Yes \_\_\_ No  N/A \_\_\_ RMK#
- d. Does each record include the date of acceptance? [3745-279-46(A)(4)] Yes \_\_\_ No  N/A \_\_\_ RMK#
- e. Does each record include the signature of a representative of the generator, transporter, processor/re-refiner that provided the used oil for transport? [3745-279-46(A)(5)] Yes \_\_\_ No  N/A \_\_\_ RMK#
25. Does the used oil transporter keep a record of each shipment of used oil that is delivered to another used oil transporter, burner, processor/re-refiner, or disposal facility? [3745-279-46(B)] Yes \_\_\_ No  N/A \_\_\_ RMK#
- a. Does each record include the name and address of the receiving facility or transporter? [3745-279-46(B)(1)] Yes \_\_\_ No  N/A \_\_\_ RMK#
- b. Does each record include the EPA ID# of the receiving facility or transporter? [3745-279-46(B)(2)] Yes \_\_\_ No  N/A \_\_\_ RMK#
- c. Does each record include the quantity of used oil delivered? [3745-279-46(B)(3)] Yes \_\_\_ No  N/A \_\_\_ RMK#
- d. Does each record include the date delivered? [3745-279-46(B)(4)] Yes \_\_\_ No  N/A \_\_\_ RMK#
- e. Does each record include the signature of a representative of the receiving facility or transporter (intermediate rail transporters are not required to sign a record of delivery)? [3745-279-46(B)(5)] Yes \_\_\_ No  N/A \_\_\_ RMK#
26. Does the used oil transporter who exports used oil to a foreign country comply with 3745-279-46(B)(1) to (B)(4)? [3745-279-46(C)] Yes \_\_\_ No  N/A \_\_\_ RMK#
27. Does the used oil transporter retain all records required under 3745-279-46 for at least three years? [3745-279-46(D)] Yes \_\_\_ No  N/A \_\_\_ RMK#
28. Does the used oil transporter generate residues from the storage or transportation of used oil? Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK#
- If so, are they managed as specified in 3745-279-10(E)? Yes \_\_\_ No  N/A \_\_\_ RMK#

[3745-279-47]

**REMARKS**

**USED OIL STANDARDS FOR PROCESSORS AND RE-REFINERS**

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

e. Is an emergency coordinator on the premises or on call at all times to meet the requirements of 3745-279-52(B)(5) and (6)?

Yes  No  N/A  RMK#

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

No  N/A  RMK# 32.

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

a. Only store used oil in tanks, containers or units subject to regulation under 3745-54 to 3745-57 or 3745-65 to 3745-69? [3745-279-54(A)] Yes  No  N/A  RMK#

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

c. Provide secondary containment for containers as required by 3745-279-54(C)? [3745-279-45(C)] Yes  No  N/A  RMK#

d. Provide secondary containment for existing aboveground tanks as required by 3745-279-54(D)? Yes  No  N/A  RMK#

e. Provide secondary containment for new aboveground tanks as required by 3745-279-54(E)? Yes  No  N/A  RMK#

f. Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil" [3745-279-54(F)] Yes  No  N/A  RMK#

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

i. Stopped the release? Yes  No  N/A  RMK#

ii. Contained the release? Yes  No  N/A  RMK#

iii. Cleaned up and managed the used oil and other materials? Yes  No  N/A  RMK#

iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes  No  N/A  RMK#

h. Performed closure of aboveground tanks and Yes  No  N/A  RMK#

containers in accordance with 3745-279-54(H)?

34. Has the owner/operator of the used oil processing/re-refining facility developed, kept on-site, and followed a written waste analysis plan which meets the requirements in 3745-279-53?

Yes  No  N/A  RMK#  
Does the used oil processor/re-refiner keep a record of each shipment of used oil accepted for processing/re-refining? [3745-279-56(A)]

N/A

RMK  
#  
35.

a. Does each record include the name and address of the transporter who delivered the used oil to the processor? [3745-279-56(A)(1)]

Yes  No  N/A  RMK#

b. Does each record include the name and address of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(2)]

Yes  No  N/A  RMK#

c. Does each record include the EPA ID # of the transporter who delivered the used oil to the processor/re-refiner? [3745-279-56(A)(3)]

Yes  No  N/A  RMK#

d. Does each record include the EPA ID # (if applicable) of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(4)]

Yes  No  N/A  RMK#

e. Does each record include the quantity of used oil accepted? [3745-279-56(A)(5)]

Yes  No  N/A  RMK#

f. Does each record include the date of acceptance? [3745-279-56(A)(6)]

Yes  No  N/A  RMK#

36. Does the used oil processor/re-refiner keep a record of each shipment of used oil that is shipped to a used oil burner, processor/re-refiner, or disposal facility? [3745-279-56(B)]

Yes  No  N/A  RMK#

a. Does each record include the name and address of the transporter who delivers the used oil to the burner, processor/re-refiner or disposal facility [3745-279-56(B)(1)]

Yes  No  N/A  RMK#

b. Does each record include the name and address of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(2)]

Yes  No  N/A  RMK#

c. Does each record include the EPA ID# of the transporter that delivers the used oil to the burner, processor/re-refiner or disposal facility? [3745-279-56(B)(3)]

Yes  No  N/A  RMK#

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

[3745-279-59]

If so, are the residues managed as specified in 3745-279-10(E)? [3745-279-59]

Yes  No  N/A  RMK#

**REMARKS**

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

42. Is off-spec used oil fuel burned for energy recovery only in industrial furnaces identified in 3745-50-10, or boilers as defined in 3745-50-10 and identified in 3745-279-61(A)(2), or hazardous waste incinerators? [3745-279-61(A)] Yes \_\_\_ No  N/A  RMK#
43. Does the used oil burner process used oil? [3745-279-61(B)] Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK#
- If so, have they complied with the requirements for processors in 3745-279-50 to 3745-279-59? [3745-279-61(B)] Yes \_\_\_ No  N/A \_\_\_ RMK#
44. Has the used oil burner notified Ohio EPA or U.S. EPA and obtained an EPA ID#? [3745-279-62(A)] Yes \_\_\_ No  N/A \_\_\_ RMK#
45. Does the used oil burner determine whether the total halogen content of the used oil being managed at the facility is above or below 1000 ppm? [3745-279-63(A)] Yes \_\_\_ No  N/A \_\_\_ RMK#
46. Does the used oil burner retain records of all analyses conducted or information used to comply with 3745-279-63 for at least three years? [3745-279-63(D)] Yes \_\_\_ No  N/A \_\_\_ RMK#
47. Does the used oil burner:
- a. Only store used oil in tanks, containers or units subject to regulation under 3745-54 to 3745-65 to 3745-69? [3745-279-64(A)] Yes \_\_\_ No  N/A \_\_\_ RMK#
- b. Only stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-64(B)] Yes \_\_\_ No  N/A \_\_\_ RMK#
- c. Provided secondary containment for containers as required by 3745-279-64(C)? [3745-279-64(C)] Yes \_\_\_ No  N/A \_\_\_ RMK#
- d. Provided secondary containment for existing aboveground tanks as required by 3745-279-64(D)? Yes \_\_\_ No  N/A \_\_\_ RMK#
- e. Provided secondary containment for new aboveground tanks as required by 3745-279-64(E)? Yes \_\_\_ No  N/A \_\_\_ RMK#

f. Labeled all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil?" [3745-279-64(F)]

Yes  No  N/A   
g. Upon detection of a release of used oil, done the following in accordance with 3745-279-64(G):

RMK #

i. Stopped the release? Yes \_\_\_ No  N/A \_\_\_ RMK#

ii. Contained the release? Yes \_\_\_ No  N/A \_\_\_ RMK#

iii. Cleaned up and managed the used oil and other materials? Yes \_\_\_ No  N/A \_\_\_ RMK#

iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes \_\_\_ No  N/A \_\_\_ RMK#

48. Does the used oil burner keep a record of each used oil shipment accepted for burning? [3745-279-65(A)] Yes \_\_\_ No  N/A \_\_\_ RMK#

a. Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-65(A)(1)] Yes \_\_\_ No  N/A \_\_\_ RMK#

b. Does each record include the name and address of the generator or processor/re-refiner who sent the used oil to the burner? [3745-279-65(A)(2)] Yes \_\_\_ No  N/A \_\_\_ RMK#

c. Does each record include the EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-65(A)(3)] Yes \_\_\_ No  N/A \_\_\_ RMK#

d. Does each record include the EPA ID# (if applicable) of the generator or processor/re-refiner who sent the used oil to the burner? [3745-279-65(A)(4)] Yes \_\_\_ No  N/A \_\_\_ RMK#

e. Does each record include the quantity of the used oil accepted? [3745-279-65(A)(5)] Yes \_\_\_ No  N/A \_\_\_ RMK#

f. Does each record include the date of acceptance? [3745-279-65(A)(6)] Yes \_\_\_ No  N/A \_\_\_ RMK#

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

50. Prior to accepting the first shipment of off-spec used oil fuel from a generator, transporter, or processor/re-refiner, does the used oil fuel burner provide to the generator, transporter, or processor/re-refiner a one-time written and signed notice certifying that:
- a. The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-279-66(A)(1)] Yes \_\_\_ No  N/A \_\_\_ RMK#
  - b. The burner will burn the used oil only in an industrial furnace or boiler identified in 3745-279-61? Yes \_\_\_ No  N/A \_\_\_ RMK#
51. Is the certification maintained for at least three years from the date the burner last received a shipment of off-spec used oil from the generator, transporter, or processor/re-refiner? [3745-279-66(B)] Yes \_\_\_ No  N/A \_\_\_ RMK#
52. Does the used oil burner generate residues from the storage or burning of used oil? [3745-279-67] Yes \_\_\_ No \_\_\_ N/A \_\_\_ RMK#
- If so, are the residues managed as specified in 3745-279-10(E)? [3745-279-67] Yes \_\_\_ No  N/A \_\_\_ RMK#

**REMARKS**

**STANDARDS FOR USED OIL MARKETERS**

53. Does the used oil fuel marketer initiate shipments of off-spec used oil only to a used oil burner that has an EPA ID# and burns the used oil in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-71] Yes \_\_\_ No  N/A  RMK#
54. Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil meets the specification for used oil fuel under 3745-279-11 keep copies of analyses of the used oil (or other information used to make the determination) for at least three years? [3745-279-72(B)] Yes \_\_\_ No  N/A \_\_\_ RMK#
55. Has the used oil marketer notified Ohio EPA or U.S. EPA and obtained an EPA ID#? [3745-279-73(A)] Yes \_\_\_ No  N/A \_\_\_ RMK#
56. Does the used oil marketer keep a record of each shipment of used oil directed to a used oil burner? [3745-279-74(A)] Yes \_\_\_ No  N/A \_\_\_ RMK#
- a. Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-74(A)(1)] Yes \_\_\_ No  N/A \_\_\_ RMK#
- b. Does each record include the name and address of the burner who receives the oil? [3745-279-74(A)(2)] Yes \_\_\_ No  N/A \_\_\_ RMK#
- c. Does each record include the EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-74(A)(3)] Yes \_\_\_ No  N/A \_\_\_ RMK#
- d. Does each record include the EPA ID# of the burner? [3745-279-74(A)(4)] Yes \_\_\_ No  N/A \_\_\_ RMK#
- e. Does each record include the quantity of the used oil shipped? [3745-279-74(A)(5)] Yes \_\_\_ No  N/A \_\_\_ RMK#
- f. Does each record include the date of shipment? [3745-279-74(A)(6)] Yes \_\_\_ No  N/A \_\_\_ RMK#
57. Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil meets the fuel specifications under 3745-279-11 keep a record of each shipment of used oil to an on-spec used oil burner? [3745-279-74(A)(6)] Yes \_\_\_ No  N/A \_\_\_ RMK#

- Yes  No  N/A  RMK#
- a. Does each record include the name and address of the facility receiving the shipment? [3745-279-74(B)(1)]
- b. Does each record include quantity of used oil fuel delivered? [3745-279-74(B)(2)]
- c. Does each record include date of shipment or delivery? [3745-279-74(B)(3)]
- d. Does each record include a cross-reference to the record of used oil analysis or other information used to make the determination that the used oil meets the specification as required in 3745-279-72(A)? [3745-279-74(B)(4)]
58. Are the records described in 3745-279-74(A) and (B) maintained for at least three years? [3745-279-74(C)]
59. Before the used oil generator, transporter or processor/re-refiner directs the first shipment of off-spec used oil to a burner, does he obtain a one time written and signed notice from the burner certifying that:
- a. The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-279-75(A)(1)]
- b. The burner will burn the off-spec used oil only in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-75(A)(2)]
60. Is the certification maintained for at least three years from the date the last shipment of off-spec used oil was shipped to the burner? [3745-279-75(B)]

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**REMARKS**