



**Environmental
Protection Agency**

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

March 23, 2011

**SCIOTO COUNTY
SUNOCO CHEMICALS-HAVERHILL
DHWM-SEDO
OHD005108477
OH PERMIT#: 04-73-0251**

Mr. Jason Patrick
Sunoco Chemicals-Haverhill
1019 Haverhill-Ohio Furnace Road
Haverhill, Ohio 45636

Dear Mr. Patrick:

On March 1, 2011, Rich Stewart and I inspected Sunoco Chemicals – Haverhill (Sunoco) to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC), and Chapter 3745 of the Ohio Administrative Code (OAC). The purpose of our visit was also to conduct a quarterly site visit to review the terms and conditions of Sunoco's Ohio Part B Hazardous Waste Permit. As you are aware, Ohio EPA's Southeast District Office, Division of Hazardous Waste Management conducts quarterly visits to permitted facilities in our district, in an effort to identify any permit modifications that may be needed to keep the permit current with the facility's operating practices. We also view these visits as an opportunity to discuss any upcoming changes or other items of interest to your facility.

During our meeting, we emphasized that permit modifications are on a different schedule by rule than is the permit renewal application (due in late April 2011). Therefore, it is important that permit modifications be addressed as soon as possible and submitted separately from the permit renewal application.

As a result of the compliance evaluation inspection, the following violations of Ohio's hazardous waste laws and rules were found:

- (1) OAC Rule 3745-65-33, Testing and Maintenance of Equipment:** All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency. The owner or operator must record the inspections in a log or summary.

Sunoco did not conduct inspections of the spill control equipment in the BD-908 building prior to March of 2010 and maintain a log of these inspections, in violation of this rule. Inspections of this spill control equipment are now being conducted and maintained in a log that was observed during the inspection. Therefore, Sunoco has adequately demonstrated compliance with this rule.

Mr. Jason Patrick
Sunoco Chemicals-Haverhill
March 22, 2011
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Enclosed, you will find a copy of the checklists that were completed as a result of the inspection. You can find copies of the hazardous waste rules and other information on the Division of Hazardous Waste web page at: <http://www.epa.ohio.gov/dhwm>. Compliance assistance and pollution prevention information is available at: <http://www.epa.ohio.gov/ocapp>.

Please feel free to contact me at (740) 380-5262 if you have any questions.

Sincerely,



John Rochotte
District Representative
Division of Hazardous Waste Management

JR/mlm

NOTICE:

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

Send to Central Office <input checked="" type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to kristina.durnell@epa.state.oh.us.

Site EPA ID No.	EPA ID Number: OHD005108477	
Site Name	Name: Sunoco Chemicals, Inc.	Website: www.sunocochemicals.com (Optional)
Site Location Information	Street Address: 1019 Haverhill-Ohio Furnace Road	
	City, Town, or Village: Haverhill	State: OH
Site Land Type (check only one)	County Name: SCIOTO	
NAICS code(s) www.census.gov/eppcd/www/naics.html	Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	Zip Code: 45636
	325192	

Facility Representative	First Name: Jason	MI:	Last Name: Patrick
Additional names can be recorded in number 12	Title: Environmental Manager		
	Phone Number: 740-533-5267		Phone Number Extension:
Only provide address information if it is different than the site address	E-Mail Address: jpatrick@sunocochemicals.com		
	Fax Number: 740-533-5376		Fax Number Extension:
	Street or P.O. Box: 1019 Haverhill-Ohio Furnace Road		
	City, Town or Village: Haverhill		Zip Code: 45636
	State: OH		

Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Sunoco, Inc.		Date Became Owner (mm/dd/yyyy):	
	Owner Type: Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>
	Street or P.O. Box: 1735 Market Street			
	City, Town or Village: Philadelphia		Owner Phone #: 215-977-3000	
	State: PA		Country: USA Zip Code: 19103-7583	
	Name of Site's Operator: Sunoco Chemicals, Inc.		Date Became Operator (mm/dd/yyyy):	
	Operator Type: Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>
	Street or P.O. Box: 1019 Haverhill-Ohio Furnace Road			
	City, Town or Village: Haverhill		Operator Phone #: 740-533-5267	
	State: OH		Country: USA Zip Code: 45636	

VIOLATIONS CITED?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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TYPE OF HANDLER - MARK "X" AS APPROPRIATE	
<input type="checkbox"/> Not a HW Generator	<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input type="checkbox"/> Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.
	<input checked="" type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input type="checkbox"/> Conditionally Exempt Small Quantity Generator <input type="checkbox"/> U.S. Importer of Hazardous Waste <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

- | | |
|--|--|
| <input type="checkbox"/> Hazardous Waste Transporter | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace |
| <input type="checkbox"/> Hazardous Waste Transfer Facility | <input type="checkbox"/> Small Quantity On-Site Burner Exemption |
| <input checked="" type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Recycler of Hazardous Waste | <input type="checkbox"/> Underground Injection Control Facility |
| | <input type="checkbox"/> Receives Hazardous Waste from Off-site |

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED

(CHECK ALL BOXES THAT APPLY)

- | | |
|---|---|
| <input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste | <input type="checkbox"/> Destination Facility for Universal Waste |
| <input type="checkbox"/> Large Quantity Handler of Universal Waste
(accumulates 5,000 kg. or more) | |

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

- Batteries
- Pesticides
- Mercury containing equipment
- Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))

- Used Oil Generator
- Used Oil Transporter
- Used Oil Transfer Facility
- Used Oil Processor
- Used Oil Re-refiner
- Off-Specification Used Oil Burner
- Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
- Used Oil Fuel Marketer to Off-Specification Used Oil Burner

Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAinfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

D001, D002, F003, F005, K022, D007 D018, F001 U022, U188 D009, U055 D035, U002
U012, U055 U165

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

Announced Yes No Additional Facility Representatives: **Mr. Paul Daniels**
Tanks Yes No
Containers Yes No

Name of Inspector(s)
John Rochotte

Name of Inspector(s)
Rich Stewart

Date of Inspection/Time
(mm/dd/yyyy) (hh:mm)
03/01/11 10:00 - 2:00 PM

Comments:

WASTE ACTIVITIES SUMMARY

Sunoco Chemicals-Haverhill

LQG/ST1

OHD005108477

Description of Waste				On-Site Management			Off-Site Management
Process Generating Waste	Waste Generated	EPA Waste Code	QTY Generated per Year	Type of Accumulation/ Storage	Type of On-Site Treatment	Waste Location	Name, state, and type of activity
Laboratory	Misc. lab wastes	D001, F003, F005	Varies (approx. < 10 lbs.)	Satellite areas w/ the lab	NA	lab	Veolia, W. Carrolton and Flanders, NJ
Process equipment clean out	Boiler firebox deposits (ash)	K022 D007	0	< 90 Day roll off box	NA	Near BD-908 <90Day Accumulation Area	Veolia , Fuel blending
General Process	Cumene Contaminated Debris ✓ and Soil Contaminated with Cumene Cumene Sludge	D001 D001, U055 D001	356 P 44480 P 1780 P	55-gal. drums	NA	BD-908 <90Day Accumulation Area	Veolia , Fuel blending 4301 Infirmary Road West Carrollton, Ohio 45449 Veolia Storage bulking, off-site transfer (no treatment)
Phenol Unit and Utilities operations	Heavy ends and phenol contaminated Trash Mixed Phenol Distillation bottoms	K022 D018	2843 P 0 P 586444 P (= Last Yr.)	55-gal. drums ----->	NA ----->	Phenol Unit and Utilities SAA's BD-908 <90Day Accumulation ----->	Veolia , W. Carrolton and Flanders, NJ Fuel blending Clean Harbors, Canada (Land Disposed)

Note: Quantities of wastes generated that appear on this Summary Table were acquired from Sunoco's 2010 Annual Hazardous Waste Report and from manifests reviewed at the facility during the inspection.

WASTE ACTIVITIES SUMMARY

Sunoco Chemicals-Haverhill

LQG/ST1

OHD005108477

Description of Waste

On-Site Management

Off-Site Management

Process Generating Waste	Waste Generated	EPA Waste Code	QTY Generated per Year	Type of Accumulation/ Storage	Type of On-Site Treatment	Waste Location	Name, state, and type of activity
Clean up of spill residues and Phenol contaminated trash	Leak detection , floor sweepings /Phenol - contaminated trash	U002 U055 U188	18602	55-gal. drums	NA	BD-908 <90Day Accumulation Area	Veolia Storage, bulking, off-site transfer (no treatment)
Process equipment clean out	Boiler rinseate water – dilute (more than 99% water)	K022 D007	0 P	55-gal. drums and tanker	NA	NA	Veolia Storage, bulking, off-site transfer (no treatment) Vickery Environmental Deep well injection
BPA Unit operations	BPA contaminated trash	U002 U188	1528 P	55-gal. drums	NA	BPA Unit SAAs BD-908 <90Day Accumulation Area	Veolia Storage, bulking, off-site transfer (no treatment)
Product/By-Product Processing	CHP Filters	D001	7736 P	55-gal. drums	NA	Phenol Unit SAAs	Veolia Storage, bulking, off-site transfer (no treatment)
	432-L Filters	D001	721 P			BD-908 <90Day Accumulation Area	
AMS tank clean out	AMS sludge	D001	0 P (1126 P = Last Year)	55-gal. drums	NA	BD-908 <90Day Accumulation Area	Veolia Storage, bulking, off-site transfer (no treatment)

Note: Quantities of wastes generated that appear on this Summary Table were acquired from Sunoco's 2010 Annual Hazardous Waste Report and from manifests reviewed at the facility during the inspection.

WASTE ACTIVITIES SUMMARY

Sunoco Chemicals-Haverhill

LQG/ST1

OHD005108477

Description of Waste				On-Site Management			Off-Site Management
Process Generating Waste	Waste Generated	EPA Waste Code	QTY Generated per Year	Type of Accumulation/ Storage	Type of On-Site Treatment	Waste Location	Name, state, and type of activity
Laboratory	Bisphenyl-acetone (BPA) lab waste and misc lab pack waste	D001 D002 D018 F001 U022 U188	8430 P	55-gal. drums	NA	Lab SAA BD-908 <90Day Accumulation Area	Veolia Storage, bulking, off-site transfer (no treatment)
Laboratory	Spent GC sample vials (CHP)	D001	320 P	55-gal. SAA drum in lab	NA	Lab SAA BD-908 <90Day Accumulation Area	Veolia Storage, bulking, off-site transfer (no treatment)
Laboratory	Spent GC sample vials (phenol)	U188	2220 P	55-gal. SAA drum in lab	NA	Lab SAA BD-908 <90Day Accumulation Area	Veolia Storage, bulking, off-site transfer (no treatment)
Laboratory	Spent COD sample vials	D002 D007 D009 D011	720 P	55-gal. SAA drum in lab	NA	Lab SAA BD-908 <90Day Accumulation Area	Veolia Storage, bulking, off-site transfer (no treatment) W. Carrolton or Flanders, NJ
Laboratory	LC wastes	D001	240 P	Lab pack	NA	Lab SAA BD-908 <90Day Accumulation Area	Veolia Storage, bulking, off-site transfer (no treatment)

Note: Quantities of wastes generated that appear on this Summary Table were acquired from Sunoco's 2010 Annual Hazardous Waste Report and from manifests reviewed at the facility during the inspection.

WASTE ACTIVITIES SUMMARY

Sunoco Chemicals-Haverhill

LQG/ST1

OHD005108477

Description of Waste				On-Site Management			Off-Site Management
Process Generating Waste	Waste Generated	EPA Waste Code	QTY Generated per Year	Type of Accumulation/ Storage	Type of On-Site Treatment	Waste Location	Name, state, and type of activity
Clean up of spill residues	Product phenol clean up,	U188	388 P	55-gal. drums	NA	BD-908 <90Day Accumulation Area	Veolia, 4301 Infirmary Road West Carrollton, Ohio 45449 ILD098642424 OHD093945293
	Phenol contaminated soil and spent organic carbon	U188	43500 P 1552 P				
Clean up of spill residues	Phenol contaminated dirt	U188	1969 P	<90 Day roll off box	NA	Near BD-908 <90Day Accumulation Area	Veolia Storage, bulking, off-site transfer (no treatment)
Clean up of spill residues	Soil contaminated with cumene	U055	0 P (Last Year = 1660 P)	<90 Day roll off box	NA	Near BD-908 <90Day Accumulation Area	Veolia Storage, bulking, off-site transfer (no treatment)
Clean up of spill residues	D001 contaminated dirt (AMS)	D001	0 P	<90 Day roll off box	NA	Near BD-908 <90Day Accumulation Area	Veolia Storage, bulking, off-site transfer (no treatment)
Clean up of spill residues	Absorbent booms	D018	0 P	55-gal. drums	NA	BD-908 <90Day Accumulation Area	Veolia Storage, bulking, off-site transfer (no treatment)

Note: Quantities of wastes generated that appear on this Summary Table were acquired from Sunoco's 2010 Annual Hazardous Waste Report and from manifests reviewed at the facility during the inspection.

WASTE ACTIVITIES SUMMARY

Sunoco Chemicals-Haverhill

LQG/ST1

OHD005108477

<i>Description of Waste</i>				<i>On-Site Management</i>			<i>Off-Site Management</i>
Process Generating Waste	Waste Generated	EPA Waste Code	QTY Generated per Year	Type of Accumulation/ Storage	Type of On-Site Treatment	Waste Location	Name, state, and type of activity
Product/By-Product Processing	Aerosol cans	D001	275 P	55-gal. drums	NA	BD-908 <90Day Accumulation Area	Veolia Storage, bulking, off-site transfer (no treatment)
Product/By-Product Processing	Spent acetone filters	D001 U002	0 P	55-gal. drums	NA	BD-908 <90Day Accumulation Area	Veolia Storage, bulking, off-site transfer (no treatment)
Maintenance, painting	Unused paint in cans, spent paint-related wastes	D001 D035	0 P	55-gal. drums	NA	BD-908 <90Day Accumulation Area	Veolia 4301 Infirmary Road West Carrollton, Ohio 45449
Maintenance - equipment & lighting changes	Mercury waste items (lamps, switches, CRTs, etc.)	Univ. waste or D009	0 P (Last yr. = 85 P)	Boxes or 55-G drums	NA	BD-908 <90Day Accumulation Area	Veolia Storage, bulking, off-site transfer (no treatment)
Lighting	Broken fluorescent lamp glass	D009	0 P				

Note: Quantities of wastes generated that appear on this Summary Table were acquired from Sunoco's 2010 Annual Hazardous Waste Report and from manifests reviewed at the facility during the inspection.

WASTE ACTIVITIES SUMMARY

Sunoco Chemicals-Haverhill

LQG/ST1

OHD005108477

Description of Waste

On-Site Management

Off-Site Management

Process Generating Waste	Waste Generated	EPA Waste Code	QTY Generated per Year	Type of Accumulation/ Storage	Type of On-Site Treatment	Waste Location	Name, state, and type of activity
Maintenance - equipment battery changes	Spent batteries (lead-acid & Ni/Cd)	Univ. waste or D008	Not generated monthly	Boxes or 55-G drums	NA	BD-908 <90Day Accumulation Area	Veolia Storage, bulking, off-site transfer (no treatment)
Product/By-Product Processing	Spent BPA filters BPA Cake	NA Non-haz U188	Varies Not generated monthly 356 P	55-G drums →	NA →	BD-908 <90Day Accumulation Area	Green Valley Landfill Disposed as solid waste Veolia, W. Carrollton, Oh and Port Arthur, TX
Maintenance - equipment oil changes	Used oil	NA	~ 1635 P Not generated monthly	55-G. drums or totes	NA	Several locations throughout plant	Veolia Storage, bulking, off-site transfer (no treatment)
On-site Medical/Emergency Care	Sharps Biomedical waste	NA Inf. Waste	Varies			BD-908 <90Day Accumulation Area	Stericycle, Parkersburg WV
Waste Acetone	Waste Acetone	D001 D018 F003 or U002	4013 P 0 P	55-G Drums	NA	BD-908	Veolia , Fuel blending 4301 Infirmary Road West Carrollton, Ohio 45449

Note: Quantities of wastes generated that appear on this Summary Table were acquired from Sunoco's 2010 Annual Hazardous Waste Report and from manifests reviewed at the facility during the inspection.

WASTE ACTIVITIES SUMMARY

Sunoco Chemicals-Haverhill

LQG/ST1

OHD005108477

Description of Waste				On-Site Management			Off-Site Management
Process Generating Waste	Waste Generated	EPA Waste Code	QTY Generated per Year	Type of Accumulation/ Storage	Type of On-Site Treatment	Waste Location	Name, state, and type of activity
General Operations and maintenance	Pit Sludge	D018 U002 U012 U055 U188 U220	8707 P	containers	NA	BD-908	Veolia , Fuel blending 4301 Infirmary Road West Carrollton, Ohio 45449
General Operations	2003-F contaminated trash and Light Hydrocarbon	D001 D018 D035	0 P 399 P	containers	Burned in the on-site BIF	2003-F Tank	Veolia, W. Carrollton, OH
General Operations	Naphthalene and Water	U165	0 P	containers	NA	BD-908	Veolia Storage, bulking, off-site transfer (no treatment)
General Operations	Copper Chromate	D001 D005 D007	0 P (1936 P Last Yr.)	containers	NA	BD-908	Veolia Storage, bulking, off-site transfer (no treatment)
General Operations	Dried paint related mat'l	D001	0 P (1646 P Last Yr.)	containers	NA	BD-908	Veolia Storage, bulking, off-site transfer (no treatment)
General Operations	Spent Resin	U188	0 P (1481 P Last Yr.)	containers	NA	BD-908	Veolia Storage, bulking, off-site transfer (no treatment)

WASTE ACTIVITIES SUMMARY

Sunoco Chemicals-Haverhill

LQG/ST1

OHD005108477

<i>DESCRIPTION OF WASTE</i>				<i>On-Site Management</i>			<i>Off-Site Management</i>
Process Generating Waste	Waste Generated	EPA Waste Code	QTY Generated per Year	Type of Accumulation/ Storage	Type of On-Site Treatment	Waste Location	Name, state, and type of activity
Phenol Production	90 % Cumene, 10 % Water	D001, U055	0 P	containers	NA		Veolia, W. Carrolton and Flanders, NJ
Phenol Production	Phenol Heavy Ends	D018, K022	0 P	containers	NA	BD-908	Veolia, Flanders, NJ
Production Process	Oxydate Water	D001, D018, U055	460 P	Containers	NA		Veolia, Sauget, IL
Maintenance	Oily Waste Sludge	D001	11944 P	Containers	NA		Veolia, W. Carrolton, OH
Process	Dytek A Amine	D002	4380 P	Containers	NA		Veolia, W. Carrolton, OH
Phenol Production	Phenol Unit Lab Waste	D002, U002, U055, U188	2435 P	Containers	NA		Veolia, Sauget, IL

WASTE ACTIVITIES SUMMARY

Sunoco Chemicals-Haverhill

LQG/ST1

OHD005108477

DESCRIPTION OF WASTE				On-Site Management			Off-Site Management
Process Generating Waste	Waste Generated	EPA Waste Code	QTY Generated per Year	Type of Accumulation/ Storage	Type of On-Site Treatment	Waste Location	Name, state, and type of activity
Waste Treatment	Spent Carbon	D001	10240 P	Containers			Veolia, W. Carrollton, OH
	Carbon w/Phenol	U188	712 P 2081 P	Containers			Veolia, W. Carrollton, OH
Maintenance	F91A Sludge	D001, U188	7293 P	Containers			Veolia, W. Carrollton, OH
Phenol Production	Water with Phenol	U188	856 P	Containers			Veolia, W. Carrollton, OH
Production	AMS Intermediates	D001, D018, D035	365600 P	Containers			Veolia, W. Carrollton, OH
Production	Soil contaminated with Sulfuric Acid	D002	858 P	Containers			Veolia, W. Carrollton, OH

Note: Quantities of wastes generated that appear on this Summary Table were acquired from Sunoco's 2010 Annual Hazardous Waste Report and from manifests reviewed at the facility during the inspection.

PROCESS INFORMATION

General:

Sunoco Chemicals-Haverhill (Sunoco) is an organic chemical manufacturer (NAICS 325192). The facility consists of two separate production units that are physically separated but functionally integrated; (1) a phenol process area consisting of three phenol/acetone lines which produce phenol, acetone, cumene hydroperoxide (CHP), and alpha-methyl-styrene (AMS); and (2) a bisphenol-A (BPA) process area that produces two different commercial grades of BPA. All processes involve the oxidation and subsequent modification through distillation of the raw product cumene.

Raw materials are received via barge, railcar, and tank truck. Heavy and light end wastes from the manufacturing processes are continuously purged from the processes to three permitted >90 day storage tanks 2003-F, 2104-F, and 2105-F. Currently, none of the permitted hazardous waste tanks contain wastes from production.

A <90 day batch feed tank, 2108-F, facilitates the movement of the process wastes to the industrial boilers where they are burned for energy recovery. Currently, because no wastes are being sent to the tank system, 2108-F is not in operation. Heavy ends in 2108-F were removed in 2009. Sunoco has five boiler industrial furnaces (BIFs), UA, UB, UC, UD, and UE; four of the boilers are operational and the fifth (UD) has been closed with USEPA oversight. A sixth boiler (UF) was added in 2000 to burn used oils only, but has not operated. Commercial chemical products are stored in above-ground tanks, silos, and warehouses prior to off-site shipment.

Phenol Process:

The phenol unit operations begin with the air oxidation of cumene into cumene hydroperoxide (CHP), followed by stripping off the excess cumene. Next the CHP is directed to the cleaver, where the CHP is split into crude phenol and acetone using sulfuric acid. From the cleaver, the process mixture is neutralized and the crude phenol, acetone, and alpha-methyl-styrene (AMS) are distilled and refined into the commercial chemical products. During the distillation and refining steps; and when the waste tanks were operable, light hydrocarbon impurities (D001/D018/D035) and heavy residual hydrocarbon wastes (K022) were continuously purged from the process to the waste fuel storage (permitted) tanks. This material was then fed to the four industrial boilers for energy recovery.

BPA Process:

The bisphenol-A (BPA) process consists of the following operations: reaction, HCL recovery, processing, and phenol recovery. In the reaction step, phenol and acetone are treated using HCL as a catalyst in a series of stirred tank reactors to form a mixture of BPA, phenol, HCL, and water. The aqueous HCL is recovered and recycled back into the reaction area. The acidic wastewater is neutralized then pumped to a storage tank. Next the crude BPA-phenol mixture is purified by two processing steps: crystallization and filtration. Excess phenol is recovered for reuse. During phenol recovery, a non-hazardous heavy hydrocarbon organic waste is generated and pumped to the waste fuel storage (permitted) tanks. This material is fed to the four industrial boilers for energy recovery.

WASTE INFORMATION

Satellite Accumulation

Sunoco maintains 24 satellite accumulation areas (SAAs) in process areas where wastes are frequently generated. The satellite accumulation drums are transferred to < 90 day accumulation area, BD-908. Locations of the SAAs are as follows:

SAA # and Wastes Accumulated		SAA Location
1	BPA-contaminated trash	Bottom floor, BPA Reaction Bldg. by Column C1
2	BPA-contaminated trash	Bottom floor, BPA Purification Bldg. by Column C2
3	BPA-contaminated trash	BPA D-103 area by acetone wash and filter
4	Lab-contaminated trash	South of ICD Lab in drum shed
5	GC Vial labpacks	ICD Lab, BD-1005 Phenol Lab
6	432-L filters	Phenol I, South of 432-F
7	Phenol contaminated trash	Phenol I, 328 J/JA pump pad area
8	Heavy ends contaminated trash	Utilities, 2007 J/JA/JB/JC/JD pump pad area
9	Heavy ends contaminated trash	Utilities, boiler area, NE 2001-UA
10	Contaminated PPE and related materials	Utilities, in 2108-F dike field by 2105 J/JA
11	Phenol contaminated trash	Phenol loading rack
12	Contaminated trash - preparing drums to ship	BD-908 less-than-90 day storage bldg.
13	Phenol contaminated trash	Phenol II process area by Column 126 N-367N
14	CHP (cumene only) contaminated trash	Phenol III east end S. 4302 J/JA
15	Phenol contaminated trash	Phenol III west end S. 4373
16	Phenol contaminated trash	Phenol III under 4217-F and 4218-F
17	Phenol contaminated trash	Phenol III east of 4720-L
18	CHP (cumene only) contaminated trash	Cumene unloading rack, north end
19	Paint-related wastes	NW corner T-2 trailer by painter=s office
20	Phenol contaminated trash (if generated)	Phenol River Dock
21	BPA-contaminated trash	BPA DR-1101 DB blowdown
22	LC Vial labpacks	ICD Lab BD-1005 BPA Lab
23	COD Vial labpacks	ICD Lab BD-1005 Water Lab
24	Aerosol cans	BD-908 less-than-90 day storage bldg.

REGULATORY HISTORY

Sunoco was last inspected on March 24, 2010 to determine compliance with Ohio's hazardous waste laws and the terms and conditions of their Ohio Part B Hazardous Waste Permit.

OHIO PART B PERMITTED FACILITY RCRA INSPECTION CHECKLIST

Facility:	Sunoco Chemicals - Haverhill	EPA ID#:	OHD 005108477
Street:	1019 Haverhill-Ohio Furnace Road	Ohio Permit #:	04-73-0251
City:	Haverhill		
State:	Ohio	Zip:	45636
		County:	Scioto
Telephone:	740-533-3420	Fax:	740-533-5376

Inspection Date(s):	03/01/11		
	Name	Affiliation	Telephone Number
Inspectors:	John Rochotte	Ohio EPA, DHWM-SEDO	740-380-5262
	Rich Stewart	Ohio EPA, DHWM-SEDO	740-380-5278
Facility Rep(s):	Jason Patrick	Sunoco Chemicals-Haverhill	740-533-5267
	Paul Daniels	Sunoco Chemicals-Haverhill	740-533-5295

Is facility operating as a generator?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Generator Requirements checklists attached</i>	

PERMIT STATUS

Permit Issued:	October 29, 2001
Permit Effective Date:	October 29, 2001
Permit Expiration Date:	October 29, 2011
Permit Renewal Date:	NA
Permit Modification Date(s):	<i>See Remarks Section, Table of Permit Modifications</i>

AUTHORIZED PERMITTED ACTIVITIES

	STORAGE		TREATMENT		DISPOSAL
<input type="checkbox"/>	Containers	<input type="checkbox"/>	Tanks	<input type="checkbox"/>	Injection Well
<input checked="" type="checkbox"/>	Tanks	<input type="checkbox"/>	Incinerator	<input type="checkbox"/>	Landfill
<input type="checkbox"/>	Waste Pile	<input type="checkbox"/>	Thermal Treatment	<input type="checkbox"/>	Land Application
<input type="checkbox"/>	Surface Impoundment	<input type="checkbox"/>	Post-Closure	<input type="checkbox"/>	Surface Impoundment
OTHER					
<input type="checkbox"/>	Post-Closure Care			<input checked="" type="checkbox"/>	Corrective Action
<input checked="" type="checkbox"/>	Boiler Industrial Furnace (BIF)			<input type="checkbox"/>	Other (specify):

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1. Has the expiration date of the permit passed? If so, Yes No NA
- a. Is the Permittee continuing any activity regulated by the permit after the expiration date of the permit? Yes No NA
- b. Has the Permittee submitted an application for a permit renewal to the Director no later than 180 days prior to the expiration date of the permit (or upon a later date if the Permittee can demonstrate good cause for late submittal)? [Condition A.6.(a)] Yes No NA
- Sunoco's Ohio Part B Permit will expire on October 29, 2011.*

NOTE: The Permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if: (a) the Permittee has submitted a timely and complete application for a renewal permit under O.A.C. Rule 3745-50-40, and; (b) through no fault of the Permittee, a new permit has not been issued pursuant to O.A.C. Rule 3745-50-40 on or before the expiration date of the permit. [Condition A.6.(b)]

2. Has the Permittee submitted the annual permit fee, payable to Treasurer of the State, to the Ohio EPA on or before the anniversary of the date of issuance during the term of the permit? [Condition A.26.] Yes No NA
3. Is the Permittee conducting any hazardous waste management activities (not otherwise exempt by law) which are not authorized by the permit? [Conditions A.1 and A.5] Yes No NA
4. Have any provisions of the permit been identified as invalid? [Condition A.4] Yes No NA
5. Has the Permittee identified any instances of noncompliance with the permit, O.R.C. Chapter 3734 or the rules adopted thereunder, which may endanger human health or the environment? If so, Yes No NA
- a. Did the Permittee immediately report the following to Ohio EPA Emergency Response Section: [Condition A.20.(b)]: Yes No NA
- i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and Yes No NA
- ii. Information concerning a release of hazardous waste, fire or explosion at the facility which could threaten human health or the environment, including a description of:
- a. Name, address and telephone number of the owner or operator? Yes No NA
- b. Name, address and telephone number of the facility? Yes No NA
- c. Date, time, type and source of release? Yes No NA
- d. Local weather conditions? Yes No NA
- e. Name and quantity of material(s) involved? Yes No NA
- f. The extent of injuries, if any? Yes No NA
- g. An assessment of the actual or potential hazard to the environment and human health inside and outside the facility where applicable? Yes No NA
- h. The response the facility took to contain and monitor the release? Yes No NA
- i. Who was notified? Yes No NA

- j. Estimated quantity and disposition of recovered material that resulted from the incident? Yes No NA
6. Did the Permittee provide a written report to the Ohio EPA Emergency Response Section within (5) days of the time the Permittee became aware of the circumstances reported in Question 5? [Condition A.21.] If so, did the report contain:
- a. A description of the noncompliance (including exact dates and times)? Yes No NA
- b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? Yes No NA
- c. Steps taken or planned to minimize the impact on human health and the environment and to reduce and prevent recurrence of the noncompliance? Yes No NA

NOTE: The Permittee need not comply with the five day written report requirement if the director, upon good cause shown by the Permittee, waives that requirement and the Permittee submits a written report within 15 days of the time the Permittee became aware of the circumstances. [Condition A.21].

7. Has the Permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8.] Yes No NA
8. Has the Permittee identified any other instances of noncompliance not provided for in Question #5? Yes No NA
- a. If so, did the Permittee report these instances to the Ohio EPA, DHWM within 15 days of becoming aware of the noncompliance? [Condition A.22.] Yes No NA
- b. Do the reports provided contain the information set forth in Condition A.20? [Condition A.22.] Yes No NA
- c. Steps taken or planned to minimize the impact on human health and the environment and to reduce and/or prevent recurrence of the noncompliance? Yes No NA
9. Has the Permittee planned any changes in the permitted facility or activity which may result in noncompliance with the conditions of the permit? Yes No NA
- a. If so, has the facility provided Ohio EPA with notice of such changes? [Condition A.15.] Yes No NA
10. Has the Permittee become aware that it failed to submit any relevant facts in the permit or issuance proceedings, or that it submitted incorrect or incomplete information in permit issuance proceedings or other submissions, to Ohio EPA? If so, Yes No NA
- a. Has the Permittee properly submitted such facts or corrected information? [Condition A.24.] Yes No NA

PERMIT MODIFICATION, REVISION, REVOCATION

1. Has the Permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.] Yes No NA
See Remarks Section - Table of Permit Modifications.

2. Has the permit been transferred to a new owner or operator? [Condition A.18.] and so, Yes No NA
- a. Has the transfer been conducted in accordance with O. R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.18.] and Yes No NA
- b. Before transferring ownership did the Permittee notify the new owner in writing of the requirements of O.R.C. Chapter 3734 and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.18.(b)] Yes No NA
3. Has the Permittee submitted reports of compliance or non-compliance with, or any progress reports on the requirements contained in any compliance schedule of the permit to Ohio EPA no later than 14 days following each scheduled date, unless otherwise specified? [Condition A.19.] Yes No NA
4. Has the Permittee furnished relevant information which Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, or to determine compliance with the permit? [Condition A.10.] Yes No NA
5. Has the Permittee furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10] Yes No NA
6. Is the Permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications to the application? [Condition A.14.] Yes No NA
7. Is the Permittee retaining a complete copy of the approved application on-site? [Condition A.14.] Yes No NA
8. Is the Permittee planning any physical alterations or additions to the permitted facility? Yes No NA
- a. If so, has the Permittee given notice to the Director of such alterations/additions? [Condition A.15.] Yes No NA
- Sunoco is anticipating process changes and has discussed this with Ohio EPA. These changes are in the planning stage only; no physical alternations have taken place.*
- b. Have such changes been made in accordance with O.A.C. Rule 3745-50-51? [Condition A.15.] Yes No NA

SITE ENTRY - AVAILABILITY OF RECORDS

1. As specified in Condition A.11., has the Permittee allowed the Director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection, to:
- a. Enter at reasonable times upon the premises where a regulated activity is located or where records are kept under the conditions of the permit? Yes No NA
- b. Have access to and copy any records required to be kept under the conditions of the permit? Yes No NA
- c. Inspect and photograph facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit? Yes No NA
- d. Sample or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by O.R.C. Chapter 3734 and the rules adopted thereunder? Yes No NA

RECORDKEEPING REQUIREMENTS

CONFIDENTIALITY

1. Has the Permittee requested confidentiality of any information of the permit in accordance with O.R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.25.] Yes No NA

OPERATING RECORD

2. Is the Permittee maintaining a written operating record at the facility as set forth in O.A.C. Rules 3745-54-73 and 3745-54-74 which contains the following information: [Conditions A.28(a)(vi) and B.22.]
- a. A description and the quantity of each hazardous waste? Yes No NA
 - b. A description of the method(s) and date(s) of its treatment or storage at the facility? Yes No NA
 - c. The location of each hazardous waste and the quantity at each location, including cross-reference to specific manifest numbers? Yes No NA
 - d. Records and results of required waste analyses? Yes No NA
 - e. Summary reports and details of all incidents that required implementation of the contingency plan? Yes No NA
 - f. Records and results of required inspections? Yes No NA
 - g. Documents required to be maintained by LDR requirements of OAC Chapter 3745-270? Yes No NA
 - h. Monitoring, testing, or analytical data, and corrective action where required, from groundwater monitoring and required monitoring of surface impoundments, landfills, waste piles and land treatment units? [3745-54-73(B)(6)] Yes No NA

DOCUMENTS TO BE MAINTAINED AT FACILITY

1. Is the Permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents: [Condition A.28.]
- a. Waste analysis plan in accordance with O.A.C. Rule 3745-54-13 and the conditions of the permit? Yes No NA
 - b. Contingency plan in accordance with O.A.C. Rule 3745-54-53 and the conditions of the permit? Yes No NA
 - c. Closure plan in accordance with O.A.C. Rule 3745-55-12 and the conditions of the permit? Yes No NA
 - d. Cost estimate for facility closure in accordance with O.A.C. Rule 3745-55-42 and the conditions of the permit? (estimate only - adequacy of estimate will be evaluated by C.O. Financial Assurance Section) Yes No NA
 - e. Personnel training plan and records required by O.A.C. Rule 3745-54-16 and the conditions of the permit? Yes No NA

- f. Inspection schedules developed in accordance with O.A.C. Rules 3745-54-15 and O.A.C. Rule 3745-55-74 and the conditions of the permit? Yes No NA
- g. Operating record in accordance with OAC Rule 3745-54-73? Yes No NA
- h. Post-closure plan, as required by OAC Rule 3745-55-18(A)? Yes No NA
Post-closure is currently not applicable to the facility.
- i. Annually-adjusted cost estimate for facility closure and post-closure, as required by OAC Rules 3845-55-42 and 3745-55-44? [Conditions B.36 through B.39] Yes No NA
2. Have any of the documents identified in Question #1 been revised as required by the terms and conditions of the permit? If so, Yes No NA
- a. Has the Permittee submitted the revisions to the Ohio EPA? [Condition A.28.(b)] Yes No NA
- b. Where required, has the Permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.28.(b)] Yes No NA
3. Does the Permittee maintain copies of all inspection logs at the facility for at least 3 years from the date of inspection? [Condition A.28.(c)] Yes No NA
4. Does the Permittee maintain copies of corrective action reports as required by Conditions E.5 through E.11 of the permit, for at least 3 years after all corrective action activities have been completed? [Condition A.28.(d)] Yes No NA

ANNUAL REPORT REQUIREMENT

1. Is the Permittee complying with annual report requirements set forth in O.A.C. Rule 3745-54-75 and the additional report requirements set forth in O.A.C. Rule 3745-54-77? [Condition B.25.] Yes No NA

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

1. In compliance with Condition A.12.(b) of the permit, do the Permittee's records of monitoring information specify the:
- a. Date(s), exact place(s), time(s) and method(s) of sampling or measurement? Yes No NA
- b. Individual(s) who performed the sampling or measurement? Yes No NA
- c. Date(s) analyses were performed? Yes No NA
- d. Individual(s) who performed the analyses? Yes No NA
- e. Analytical technique(s) or method(s) used? Yes No NA
- f. Results of such analyses? Yes No NA
2. Have the methods used to obtain a representative sample of the waste to be analyzed included the appropriate SW-846 method or an equivalent method specified in the approved waste analysis plan? [Condition A.12(a)] Yes No NA

3. In accordance with Condition A.14 of the permit, is the Permittee retaining records of monitoring information as required by the permit for at least 3 years from the date of sampling, including: Yes No NA
- a. All calibration and maintenance records? Yes No NA
4. Has the Permittee signed and certified all records, plans and reports in accordance with O.A.C. Rule 3745-50-42? [Condition A.13. and A.25.] Yes No NA

WASTE MINIMIZATION REQUIREMENTS

1. Does the Permittee certify at least once every year that a program is in place to reduce the volume and toxicity of hazardous waste generated in accordance with Condition A.29(a) and OAC rule 3745-54-73? Yes No NA
2. Did the Permittee submit the waste minimization report to Ohio EPA, Office of Compliance Assistance and Pollution Prevention, and Southeast District Office, within 180 days of journalization of this permit, and submit updates biennially thereafter? [Condition A.29(c)] Yes No NA
3. Has the Permittee reduced the amount of waste (hazardous waste, solid waste, air emissions, waste water discharges, etc.) this year generated at their facility by implementing pollution prevention/waste minimization? Yes No NA
- a. If so, what amount of waste has the Permittee reduced this year?
4. Has the Permittee saved money this year by implementing pollution prevention (reducing raw material usage, disposal fees, energy savings, etc.)? Yes No NA
- a. If so, how much money has the Permittee's company saved this year?

NOTE: This information only needs to be collected one time for the calendar year

COMPLIANCE SCHEDULE/DOCUMENTS

1. Has the Permittee submitted a written assessment and installation certification of all new and replaced ancillary piping associated with the permitted tank systems as required by OAC Rule 3745-55-92? [Condition A. 27, Condition D.2] Yes No NA
Sunoco replaced permitted > 90 day hazardous waste storage Tank 2003-F, and placed the tank in use on August 2, 2006. A PE certification was submitted in December 2006, following completion of the secondary containment installation and repair work. Ancillary piping has not been replaced since this time.
2. Within 180 days of permit journalization, did the Permittee submit a report from an out-of-service internal tank inspection for Tanks 2003-F, 2104-F, and 2105-F that has been performed within the last twenty (20) years? [Condition A.27(f)]; or Yes No NA
Sunoco submitted the following out-of-service internal tank inspection reports within 180 days of permit journalization: Tank 2003-F dated 4/21/2004; Tank 2104-F dated 7/17/1991; Tank 2105-F - dated 7/22/1987.

- a. If the above report was not available, did the Permittee perform an out-of-service internal inspection for each of the tank systems, and submit a report of the out-of-service inspections in lieu of the first in-service inspection report referenced in (b) below)? [Condition A.27(f)] Yes No NA
Out-of-service internal tank inspection reports were available and were submitted when the tanks were in service (see above).
- b. Did the Permittee submit a report for an in-service tank inspection for each of the tank systems within five years of the previous in-service tank inspection? [Condition A.27(e)] Yes No NA
3. Did the Permittee, on or before *February 26, 2003*, paint all areas of Tank 2104-F that showed signs of external corrosion? [Condition A.27(c)] Yes No NA
Tanks are currently not in use and are not being maintained to prevent external corrosion.
- a. Has the Permittee painted all areas of Tank 2104-F that show signs of external corrosion every five years thereafter (or sooner if the tank begins to show signs of corrosion), in order to provide continued external corrosion protection? [Condition A.27(c)] Yes No NA
5. Did the Permittee, on or before *February 26, 2004*, paint all areas of Tank 2105-F that showed signs of external corrosion? [Condition A.27(d)] Yes No NA
Tanks are currently not in use and are not being maintained to prevent external corrosion.
- b. Has the Permittee painted all areas of Tank 2105-F that show signs of external corrosion every five years thereafter (or sooner if the tank begins to show signs of corrosion), in order to provide continued external corrosion protection? [Condition A.27(d)] Yes No NA
In May 2, 2003, Sunoco painted all areas of Tank 2003-F, Tank 2104-F, and 2105-F that showed signs of external corrosion. Tank 2003-F has since been replaced with a stainless steel tank; Tanks 2104-F and 2105-F are currently out-of-service.

GROUND WATER MONITORING

1. Has the Permittee conducted semi-annual sampling of their monitoring wells? Yes No NA
2. Have they reported the results in the Annual Report to the director by March 1st as required by Condition B.25? Yes No NA
Sunoco completed groundwater monitoring required for the closure of the BPA Lagoons and federal corrective action investigation. The facility is not currently conducting ongoing groundwater monitoring.

WASTE ACCEPTANCE AND GENERATION

1. Is the Permittee storing any containers of hazardous waste received from any off-site source that the Permittee is not permitted to store? [Condition A.1.] Yes No NA
2. Has the Permittee arranged to receive hazardous waste from a foreign or off-site source that the Permittee is not permitted to store? [Condition A.1.] Yes No NA
3. Has the Permittee notified the director at least four weeks prior to the date the Permittee expects to receive hazardous waste from a foreign source, as required by OAC rule 3745-54-12(A)? [Condition B.2(a)] Yes No NA

OFF-SITE SHIPMENTS - MANIFEST REQUIREMENTS

1. Is all hazardous waste transported from the facility by a properly registered transporter of hazardous waste in accordance with all applicable laws, rules and standards?
ORC 3734.15(C), OAC Rule 3745-52-12, [Condition A.16.] Yes No NA
2. Is the Permittee complying with the following manifest requirements set forth in O.A.C. Chapter 3745-52 and O.A.C. Rules 3745-54-70, 3745-54-71, 3745-54-72 and 3745-54-76 [Condition B.24.]?
 - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, USEPA form 8700-22 (and, if necessary, USEPA form 8700-22A) in compliance with O.A.C. Rule 3745-52-20(A)? Yes No NA
 - b. The manifest form used contains all information required by O.A.C. Rule 3745-52-20 and the minimum number of copies required by O.A.C. Rule 3745-52-22? Yes No NA
 - c. The facility has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with O.A.C. Rule 3745-52-20(C)(D)(E)? Yes No NA
 - d. Prepared manifests have been signed by the facility and initial transporter in compliance with O.A.C. Rule 3745-52-23? Yes No NA
3. Has the Permittee received a return copy of each completed manifest within (35) days of the date the waste was accepted by the initial transporter? Yes No NA
 - a. If not, has the Permittee complied with the manifest exception reporting requirements of O.A.C. Rule 3745-52-42? Yes No NA
4. Are signed copies of all hazardous waste manifests and any documentation required for exception reports retained for at least three years at the facility as required by O.A.C. Rule 3745-52-40? Yes No NA

PROHIBITIONS

1. Has the Permittee complied with the prohibition of receiving hazardous waste from off-site or foreign sources? [Conditions B.1(b). and B.2.] Yes No NA

WASTE ANALYSIS - WASTE ANALYSIS PLAN

GENERAL REQUIREMENTS

1. Does the Permittee have a detailed chemical and physical analysis of waste streams which contains all information which is necessary to properly treat, store or dispose of the waste in accordance with O.A.C. Chapters 3745-54 to 3745-57 and Condition B.3 of the permit? (Section C of approved permit application) [3745-54-13(A)(1)] Yes No NA
2. Is the Permittee following the procedures described in the approved waste analysis plan (Section C of approved permit application) and the requirements of O.A.C. Rule 3745-54-13? [Condition B.3.] Yes No NA
3. In accordance with OAC Rule 3745-54-13(A)(3), does the Permittee repeat the waste analysis when the process or operation generating the hazardous waste has changed, or at least annually? Yes No NA

QUALITY ASSURANCE REQUIREMENTS

1. Does the Permittee use a contract laboratory to perform analysis? If so, Yes No NA
- a. In accordance with Condition B.3. of the permit, has the Permittee informed the lab in writing that it must operate under the waste analysis conditions as set forth in the permit? Yes No NA

FACILITY GENERAL INSPECTION REQUIREMENTS

1. Is the Permittee following the inspection procedures and schedules set forth in Section F of the permit application and the requirements of OAC Rule 3745-54-15(A), (C), and (D), and OAC Rule 3745-54-73? [Condition B.5.] Yes No NA
2. Is the Permittee following the approved inspection schedule(s) for inspecting the following, as specified in Section F of the permit application and OAC Rule 3745-54-15(B):
NOTE: the inspection schedule set forth in Section F of the Part B permit application is divided into general facility inspections and specific unit inspections. General facility inspections include monitoring equipment, safety and emergency equipment, security devices, and operating/structural equipment. Unit inspections include tank system inspections, container storage area inspections, and process tank inspections (page F-3).
- a. Monitoring equipment? Yes No NA
Monitoring equipment includes tank level gauges/high level alarms and tank leak detection (monitoring of space between tank double bottom /bleed pipe), per Part B permit application Section F-2b(2) (b) and (c), page F-7. (Tanks are currently out of service.)
- b. Safety equipment? Yes No NA
Safety and emergency equipment are combined. Inspection schedule is located in Part B permit application, Section F, Exhibit F-2. Example inspection checklist located in Part B permit application Attachment F-2.
- c. Emergency equipment? Yes No NA
Safety and emergency equipment are combined. Inspection schedule is located in Part B permit application, Section F, Exhibit F-2. Example inspection checklist located in Part B permit application Attachment F-2. Inspections of the spill kit in BD-908 were not being conducted prior to March, 2010. These inspections are currently being conducted and a log of these inspections is being maintained.
- d. Security devices? Yes No NA
Inspection schedule is located in Part B permit application, Section F, Exhibit F-1. Example inspection checklist is located in Part B permit application Attachment F-1.
- e. Operating and structural equipment? Yes No NA
When the tanks are operable and in use, Hazardous Waste Tank Systems, including ancillary equipment/components, and secondary containment are inspected daily for external corrosion, deterioration, and leaks or releases as per Part B permit application Section F-2b(2) (a) and (b), page F-7. Process Tanks are also inspected daily.
3. Is the inspection schedule kept at the facility as required by OAC Rule 3745-54-15(B)(2)? [Condition A.28.(a)(vii) and Condition B.5.] Yes No NA
4. Does the Permittee remedy any deterioration or malfunctions discovered by an inspection as required by OAC Rule 3745-54-15 (C)? [Condition B.5.] Yes No NA
items noted as "unsatisfactory" on the inspection checklists require completion of a work order for repairs, etc. The work orders are maintained electronically and are available for review upon request.

5. In accordance with OAC Rule 3745-54-15(D), do inspection records contain the following information:

- a. Date and time of inspection? Yes No NA
- b. Name of inspector? Yes No NA
- c. Notation of observations made? Yes No NA
- d. Date and nature of any repairs or other remedial actions? Yes No NA

PERSONNEL TRAINING

- 1. Is the Permittee conducting personnel training in accordance Section H of the approved permit application and the with following requirements of O.A.C. Rule 3745-54-16 [Condition B.6.]: Yes No NA
 - a. The Permittee provides personnel training which includes in safe equipment operation, emergency instruction procedures, and implementation of the contingency plan? [OAC Rule 3745-54-16(A)(B)(C)] Yes No NA
 - b. The Permittee provides personnel training to new employees within 6 months after their date of employment as required by OAC Rule 3745-54-16(B)? Yes No NA
 - c. The Permittee provides an annual refresher training course as required by OAC Rule 3745-54-16(C)? Yes No NA
- 2. Is the Permittee maintaining personnel training records as required by OAC Rule 3745-54-16(D) and (E), and the approved Part B permit application, including; written job titles, job descriptions and documented employee training records? [Condition B.6.]

REQUIRED EQUIPMENT

- 1. Is the Permittee, at a minimum, maintaining the equipment at the facility that is required by O.A.C. Rule 3745-54-32 and set forth in Section F (also listed in Section G) of the permit application? [Condition B.9.] Yes No NA
- 2. Is the Permittee inspecting, testing, and maintaining the above required equipment to assure its proper operation, as specified in O.A.C. Rule 3745-54-33, Sections F and G of the permit application, and the terms and conditions of the permit? [Condition B.10] Yes No NA
- 3. Whenever hazardous waste is being managed at the facility, has the Permittee provided all personnel involved in the operation with immediate access to an internal alarm or emergency communication device as required by O.A.C. Rule 3745-54-34, Section F of the approved permit application, and the terms and conditions of the permit? [Condition B.11] Yes No NA

CONTINGENCY PLAN/EMERGENCY REQUIREMENTS

EMERGENCY PROCEDURES

1. In compliance with OAC Rule 3745-54-37(A) and (B), and Condition B.13.(a) of the permit, does the Permittee:
- a. Familiarize the emergency response agencies likely to respond to an emergency at the facility with: Yes No NA
 - i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and Yes No NA
 - ii. The layout of the facility? Yes No NA
 - iii. Properties of hazardous waste managed at the facility and associated hazards? Yes No NA
 - iv. Places where facility personnel will normally be working? Yes No NA
 - v. Entrances to and roads inside the facility? Yes No NA
 - vi. Evacuation routes as depicted in Section E of the permit application? Yes No NA
 - vii. Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the facility, and any further requirements imposed by the permit? and; Yes No NA
 - viii. Familiarize local ambulance services, fire depts., hospitals and any other local emergency services with the properties of hazardous waste managed at the facility and the types of injuries or illness which could result from fires, explosions or a release of hazardous wastes at the facility? Yes No NA
2. Is the Permittee in compliance with the requirements of O.A.C. Rule 3745-54-56 and Sections F and G of the approved permit application regarding emergency procedures? [Condition B.20.] Yes No NA

EMERGENCY AUTHORITIES

1. Has a state or local agency declined to enter into the arrangements set forth in O.A.C. Rule 3745-54-37(A)? If so, Yes No NA
- a. Has the Permittee documented the refusal in the operating record as required by O.A.C. Rule 3745-54-37(B)? [Condition B.13.(b)] Yes No NA

CONTINGENCY PLAN

1. Has the Permittee, in accordance with O.A.C. Rule 3745-54-53 submitted a copy of the approved contingency plan (including amendments, revisions or changes) to all local authorities, agencies and response contractors designated in the approved contingency plan? [Condition B.18.(b)] Yes No NA

2. Has the Permittee notified the above agencies, in writing, within (10) days of the effective date of any amendments or revisions to the Plan? [Condition B.17.] Yes No NA
3. Has the Permittee submitted a copy of the approved contingency plan and all revisions, amendments and modifications to the Ohio EPA, Division of Emergency and Remedial Response in accordance with O.A.C. Rule 3745-54-53? [Condition B.18.(c)] Yes No NA

EMERGENCY COORDINATOR

1. At all times, is there an emergency coordinator on-site or available on-call to respond to an emergency as required by O.A.C. Rule 3745-54-55? [Condition B.19.] Yes No NA

AMENDMENT OF PLAN

1. Is the Permittee reviewing the approved contingency plan at least annually, and upon the occurrence of any event listed in O.A.C. Rule 3745-54-54; and amending the plan immediately if needed, in compliance with O.A.C. Rule 3745-54-54? [Condition B.17.] Yes No NA

The contingency plan is reviewed annually to determine if changes are needed. Revisions have been identified and a permit modification is expected to be submitted to Ohio EPA that addresses contingency plan changes.

NOTE: Also see Question #4 of Recordkeeping Requirements to verify that any changes to the contingency plan were submitted in accordance with O.A.C. Rule 3745-50-51.

IMPLEMENTATION OF PLAN

1. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents at the facility since date of last inspection as described by Condition B.14. of the permit, including:
- a. A spill or release of hazardous waste or hazardous waste constituents greater than 0r equal to 55 gallons? Yes No NA
See "Release History" Table below:

RELEASE HISTORY (2006 – Present)

Date	Constituent	Amount	RQ	Exceeded
06/18/2006	Phenol	4000 G	1000 P	Y
06/21/2006	Cumene	250 G	5000 P	N
	Phenol	Unknown	1000 P	N
07/05/2006				
10/10/2006	Acetone	1300 G	5000 P	Y
12/13/2006	Cumene/AMS	18 G	100P	Y
01/29/2007	Phenol heavy ends	9 P	100P	N
03/09/2007	LCH (on 2003-F floating roof)	3 G	NA	NA
11/17/2007	AMS	303 P	100P	Y

- b. A spill or release of hazardous waste or hazardous waste constituents less than 55 gallons that may result in a fire or explosion hazard as determined by the Emergency Coordinator? Yes No NA
- c. A spill on-site that may potentially cause on or off-site soil and/or ground water or surface water contamination? Yes No NA

- d. A spill or release of hazardous waste or hazardous waste constituents that reported to the National Response Center or local (city or county) emergency response center because the spill exceeded RQ limits? Yes No NA
- e. A fire or explosion involving hazardous waste? Yes No NA
2. If so, did the Permittee:
- a. Immediately implement the approved contingency plan and follow the emergency procedures described in OAC Rule 3745-54-56? [Condition B.14.] Yes No NA
- b. Collect and manage the released material, emergency response material, and by-products as hazardous waste until making a demonstration to Ohio EPA that such materials are not subject to Ohio hazardous waste rules?[Condition B.16.] Yes No NA
- c. Submit a written report of the incident to the Director within 15 days of the incident? If so; Yes No NA
- i. Did the report contain the elements set forth in OAC Rule 3745-54-56(J)? [Condition B.23.] Yes No NA
- ii. Did the Permittee note in the operating record the time, date and details of any incident that required the implementation of the approved contingency plan? [Condition B.23.] Yes No NA

SECURITY REQUIREMENTS

1. Is the Permittee complying with the following security provisions of OAC Rule 3745-54-14, and Section F of the approved permit application: [Condition B.4.]
- a. Does the Permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility? Yes No NA
- b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility? Yes No NA
- c. A means to control entry, at all times, through gates or other entrances, to the active portion of the facility? Yes No NA
2. In accordance with OAC Rule 3745-54-14 (C), does the Permittee have signs reading "Danger-Unauthorized Personnel Keep Out" posted at facility entrances and at entrances of hazardous waste container storage locations? Yes No NA
- a. Are the above signs posted in a way so they be seen when approaching these areas of the facility? Yes No NA

FACILITY OPERATION

1. Is construction, maintenance, and operation of the facility being conducted to minimize the possibility of a fire, explosion, or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil ground or surface water? [OAC Rule 3745-54-31 and Condition B.1.] Yes No NA

REQUIRED AISLE SPACE

1. Is the Permittee maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in the event of an emergency to any area of the facility as required by O.A.C. Rule 3745-54-35? [Condition B.12.] Yes No NA

CLOSURE REQUIREMENTS

CLOSURE PLAN - AMENDMENT OF PLAN

1. Does the Permittee maintain the approved closure plan at the facility? [Conditions A.28(a)(iii) and B.29.] Yes No NA

2. Has the Permittee amended the closure plan? If so, Yes No NA

- a. Has the plan been amended in accordance with OAC Rule 3745-55-18(D)? [Condition B.28.] Yes No NA

Tank 2105F was taken out-of-service for cleaning and internal inspection in September 2007. Sunoco used scarification (dry ice blasting) to clean the tank; this method would be used to demonstrate meeting clean closure performance standards should they decide to certify the tank closed.

Sunoco must submit a permit modification to incorporate the use of the scarification cleaning method for the permitted tanks into the closure plan.

3. Does the Permittee maintain at the facility, and submit to Ohio EPA, the latest closure cost estimate as required by OAC Rule 3745-55-42(D)? Yes No NA

NOTE: Also see Recordkeeping Requirements in order to verify that any changes to the closure plan were submitted in accordance with O.A.C. Rule 3745-50-51.

CLOSURE ACTIVITIES

1. Has the Permittee closed the facility, or closed a hazardous waste management unit at the facility? If so, Yes No NA
 - a. Was closure conducted in accordance with the closure performance standard of O.A.C. Rule 3745-55-11? [Condition B.26.] Yes No NA
 - b. Did the Permittee carry out the approved closure plan as set forth in the permit application and terms and conditions of the permit? [Condition B.26.] Yes No NA
 - c. Has the Permittee decontaminated and/or disposed of all equipment, structures and soils as required by OAC Rule 3745-55-14 and the approved closure plan? [Condition B.32.(a)] Yes No NA
 - d. Did the Permittee notify Southeast District Office, OEPA within five 5 working days prior to all rinseate and soil sampling? [Condition B.32.(b)] Yes No NA
 - e. Has the Permittee certified that the facility or hazardous waste management unit has been closed in accordance with the specifications in the approved closure plan as required by O.A.C. Rule 3745-55-15? [Condition B.33.] Yes No NA

Note: The BPA Lagoons and Phenol Waste Water Treatment System (PWWTS) closure plans were removed from Sunoco's Part B permit per a Class 1A permit modification finalized in September 2006.

CORRECTIVE ACTION

NOTE: USEPA has granted authority for oversight of current corrective action activities at Sunoco to the State of Ohio.

1. If there has been a release of hazardous waste or hazardous waste constituents from any waste management unit (WMU) at the facility, has the Permittee complied with OAC Rule 3745-55-01 and instituted corrective actions as necessary to protect human health and the environment? [Conditions E.1, E.5] Yes No NA
2. In the event that it is necessary to protect human health and the environment, has the Permittee implemented corrective actions beyond the facility property boundary? [Condition E.2.] Yes No NA
3. Does the Permittee comply with the Federal Permit terms and conditions concerning corrective actions as issued? [Condition E.1, Module E Summary] Yes No NA
4. Has the facility discovered any additional WMUs that have not yet been investigated as part of the current RFI? [Condition E.5.] Yes No NA
5. Have there been any new releases from existing WMUs that are being investigated as part of the current RFI? [Condition E.5.] Yes No NA

NOTE: If "yes" to Questions #3 and #4 above, it may be necessary for the Permittee to prepare and submit an RFI for the newly discovered units or releases to Ohio EPA.

ADDITIONAL REMARKS

Table of Permit Modifications 2003 - Present

Date	Class	Action
02/6/2003	3A	Facility operator change to Sunoco, Inc. R&M. Facility name change to Sunoco Chemicals-Haverhill.
03/11/2003	1	16 class 1 modifications with separate PITS #s
05/06/2003	2	4 class 2 modifications with separate PITS #s
9/22/2004	1	Replacement of internal floating roof on permitted Tank 2003-F
01/25/2005	1	To be eligible for Ohio's BIF Permit-by-Rule status. Modification incorporated 4 boilers into Ohio Part B Permit (prior to Ohio BIF authorization). Submittal included revised Part A Permit Application and BIF Certification.
07/12/2005	1	Annual financial assurance update.
09/14/2005		Part B Permit Application and Siting Criteria Document for incorporating 4 boilers into Ohio Part B Permit/Permit Application
12/29/2005	Temporary Authorization	To allow burning in Boiler UC under modified operating conditions until C3 mod approval
03/22/2006	1A	Extension of one additional 720-hour pretrial burn period to operate Boiler UC.
04/24/2006	1A	Extension of the permit duration from 5 years to 10 years; correction of facility owner information.
09/14/2006	1	Annual financial assurance update
09/18/2006	1A	Removal of the BPA Lagoons and Phenol Wastewater Treatment System Closure Plans from permit application/permit terms and conditions.
11/14/2006	3	Retrofit Boiler UC and perform the November 2005 Boiler UC Trial Burn Plan.
03/19/2007	3B	Addition of four hazardous waste boilers to the permit.
06/04/2007	1	Replacement of permitted Tank 2003-F with functionally equivalent tank.
06/19/2007	1	Annual financial assurance update (did not include closure cost update).
08/08/2007	1	Updated closure cost estimate (not submitted with financial assurance)
08/31/2007	2	Contingency plan update, including changes to emergency procedures (spill or release response).
10/09/2007	1	Administrative/informational updates to reflect the results of the May 2006 trial burn.
10/09/2007	2	General updates to Part B including replacement of outdated information.
2007-present	1	Annual financial assurance and closure cost estimate update.

**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]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
8.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	For manifests that have not been returned to the generator, has an exception report been filed? [3745-52-55]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>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)(1)]</i>		
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>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)].</i>		
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
17.	If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>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.</i>		
18.	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
19.	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>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.</i>		
PERSONNEL TRAINING		
21.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
25.	Does the generator provide annual refresher training to employees? [3745-65-16(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
26.	Does the generator keep records and documentation of:	
a.	Job titles? [3745-65-16D(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

b.	Job descriptions? [3745-65-16D(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Type and amount of training given to each person? [3745-65-16D(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Completed training or job experience required? [3745-65-16D(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
27.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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

CONTINGENCY PLAN

28.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures 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)]

30.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] The contingency plan is currently undergoing revision. A permit mod is expected to be submitted to OEPA in March, 2011.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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

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

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

34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
35.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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

36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] NOTE: inspections for the spill control kit in BD-908 was not inspected prior to March, 2010. These inspections are now being conducted.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
38.	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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
39.	If there is only one employee on the premises, is there immediate access to a device (eg., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

SATELLITE ACCUMULATION AREA REQUIREMENTS

43.	Does the generator ensure that satellite accumulation area(s):	
a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	Containers are closed, in good condition and compatible with wastes	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

		stored in them? [3745-52-34(C)(1)(a)]	
	f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
44.		Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

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

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

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

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.

53.		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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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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

54.	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

**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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>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).</i></p>		
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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input 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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input 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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>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.</i></p>		
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"/>
<p><i>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.</i></p> <p><i>NOTE: Written documentation of this determination is not required.</i></p>		
7.	Did the generator treat his HW /soil on-site <u>to meet</u> the LDR treatment standard?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE If "Yes" see question #16.</i></p>		
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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
10.	Does the generator have a copy of the LDR notification form on file?[3745-270-07(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<p>NOTIFICATION FORM</p>		
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"/>
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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"/>
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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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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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"/>
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13.	Is the HW a metal-bearing HW?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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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)]	
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	i.	Contains > 1% TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	ii.	Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	v.	Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	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"/>
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15.	Was the HW treated by wastewater treatment?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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	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"/>
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NOTE: If Yes, HW is improperly being treated by dilution.

	b.	Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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	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"/>
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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 <u>to meet</u> 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 checked="" 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 checked="" type="checkbox"/>
NOTE: This is a laboratory analysis but it does not have to be kept by the generator.			
	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 checked="" 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 checked="" 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 checked="" 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 FOR GENERATOR TREATMENT			
17.	a.	Contains all information in #11 a-g above and	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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 checked="" 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 checked="" 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 checked="" type="checkbox"/>
		2. Description of HW when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
		3. HW code when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
		4. Treatability group when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
		5. Underlying hazardous constituents present when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iv.	Contain the certification statement as required by 3745-70-07(B)(4)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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

NOTE: 1. 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.

2. Inspectors can check BUSTR's web-site at https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at:

https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp.

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"/>
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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"/>
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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"/>
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3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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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"/>
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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"/>
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NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

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

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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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"/>
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8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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a.	Stopped the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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b.	Contained the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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ON-SITE BURNING IN SPACE HEATERS		
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).</i>		
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-transport 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 checked="" type="checkbox"/>
<i>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).</i>		
COLLECTION CENTERS AND AGGREGATION POINTS		
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>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.</i>		

SMALL 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

PROHIBITIONS

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

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES

3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

UNIVERSAL WASTE LAMPS

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

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 rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.

10.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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ACCUMULATION TIME		
11.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Accumulation is defined as date generated or date received from another handler.</i>		
12.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
EMPLOYEE TRAINING		
13.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RESPONSE TO RELEASES		
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] <i>No observable evidence of releases of universal waste was noted during the inspection. There were no documented releases of universal waste in the facility's Operating Record or Container Storage Area inspection logs (where Universal wastes are stored).</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
OFF-SITE SHIPMENTS		
<i>NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.</i>		
17.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
21.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u> :	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
22.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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