OhioEPA

State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

April 27, 2007

SCIOTO COUNTY
SUNOCO CHEMICALS-HAVERHILL
DHWM-SEDO
OHD005108477

Mr. Andrew Lett
Sunoco Chemicals-Haverhill
1019 Haverhill-Ohio Furnace Road
Haverhill, Ohio 45636

Dear Mr. Lett:

On April 4 and April 11, 2007, Pam McCoy and I inspected Sunoco Chemicals-Haverhill (Sunoco) to determine compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC), Chapter 3745 of the Ohio Administrative Code (OAC), and with the terms and conditions of Sunoco's Ohio Part B Hazardous Waste Permit. This letter will explain the violations we found and what you need to do to correct the violations, as well as other general concerns we have and what you need to do to respond to those concerns.

We found the following violations of Ohio's hazardous waste laws. In order to correct these violations, you must do the following and send me the requested information and documentation ***within 30 days*** of your receipt of this letter:

(1) GENERAL PERMIT CONDITIONS
Condition A.1.(b); Effect of Permit, and Condition A.5. Duty to Comply

A.1.(b); Effect of Permit: *Any management of hazardous waste not authorized by this permit is prohibited unless otherwise expressly authorized or specifically exempted by law.*

A.5. Duty to Comply: *The Permittee shall comply with all applicable provisions of ORC Chapter 3734, all applicable Ohio hazardous waste rules, and all terms and conditions of this permit, except to the extent and for the duration such noncompliance is authorized by the laws of the state of Ohio. Any permit noncompliance, other than noncompliance authorized by the laws of the state of Ohio, constitutes a violation of ORC Chapter 3734 and the rules adopted thereunder and is grounds for enforcement action, suspension, revocation, modification, revision, or denial of a permit renewal application, or other appropriate action.*

Sunoco has violated both of the above permit conditions due to the following:
Sunoco replaced permitted > 90 day hazardous waste storage Tank 2003-F with a new tank, and placed the new replacement tank in service on August 2, 2006. Beginning on August 2, 2006, Sunoco has operated new replacement Tank 2003-F prior to this activity being authorized by their Ohio Part B hazardous waste permit.

On April 5, 2007, Sunoco submitted a Class 1 permit modification request for the replacement of > 90 day hazardous waste storage Tank 2003-F. Ohio EPA is in the process of reviewing the modification request and permit application replacement pages submitted by Sunoco.

No further action is required to demonstrate compliance with the above permit conditions at this time. Sunoco will remain in violation of permit conditions A.1.(b) and A.5. until the permit modification has been reviewed and acknowledged as being approved by Ohio EPA.

(2) TANK STORAGE AND MANAGEMENT PERMIT CONDITIONS
Condition D.2(a) and (b), Design and Installation of New Tank Systems or Components

***D.2.(a)**: The Permittee shall construct the tank system and components in accordance with Section D of the approved Part B application.*

***D.2.(b)**: Prior to the operation of the newly constructed tank system the Permittee shall submit the certification of installation of the tank system and components in accordance with OAC Rule 3745-55-92(B) to ensure that proper handling procedures were adhered to in order to prevent damage to the system during installation.*

Sunoco has violated both of the above permit conditions due to the following:

Sunoco replaced permitted > 90 day hazardous waste storage Tank 2003-F, and placed the tank in service on August 2, 2006. Repairs and upgrades to the tank's secondary containment system were performed after the tank system assessment and installation certification was conducted. The PE certification for the tank system was dated August 1, 2006; but Sunoco's records indicate that the tank's secondary containment was under repair until November 5, 2006. A PE certification should have been conducted and submitted following the completion of all of the tank system's secondary containment installation and repair work.

Sunoco must submit a comprehensive PE assessment report and installation certification that includes all of the secondary containment installation and repair work completed on for the 2003-F tank system. Sunoco will remain in violation of permit conditions D.2(a) and D.2(b) until the permit PE assessment report and installation certification for the 2003-F tank system has been submitted and reviewed, and Ohio EPA has acknowledged that the submitted report meets the requirements of the permit condition and the applicable Ohio hazardous waste rules. Please note that the documentation for Tank 2003-F must include a written assessment attesting that the design, installation and structural integrity of the tank system is adequate for the management of hazardous waste in accordance with OAC Rule 3745-55-92(A).

(3) GENERAL PERMIT CONDITIONS
Condition A.27.(e) Compliance Schedule Documents, and Condition D.5.(e) Inspection Schedules and Procedures:

A.27.(e): *Within five years of the date of the previous in service tank inspection, and every five years thereafter, the Permittee shall submit an in service tank inspection report for each of the tanks and associated ancillary equipment. This inspection should be performed in accordance with American Petroleum Institute (API) standards 653 and 575, including ultrasonic thickness testing of the tanks.*

D.5.(e): *The Permittee shall inspect the tanks in accordance with the compliance schedule in permit condition A.27.*

Sunoco has violated both of the above permit conditions due to the following:

Sunoco's has previously submitted in service tank inspection reports, dated May 4, 2000, for Tank 2104-F, Tank 2105-F, and for Tank 2003-F prior to its replacement. Ohio EPA's records indicate the piping from Utilities (boilers), Phenol I, and the Aniline Unit (now out of service) to the above tank systems was inspected in June 2000. In accordance with the above permit conditions, in service tank inspection reports for the permitted tank systems were due to be submitted by May 5, 2005. Ohio EPA has not yet received these reports.

Sunoco must submit in service tank inspection reports for permitted > 90 day hazardous waste storage Tank 2104-F, Tank 2105-F, and new replacement Tank 2003-F. Sunoco will remain in violation of permit conditions A.27.(e) and D.5.(e) until the in service tank inspection reports have been received and reviewed, and Ohio EPA has acknowledged that the submitted reports meet the requirements of the permit conditions and applicable Ohio hazardous waste rules. Please note that the documentation requested for new replacement Tank 2003-F in (3) above (i.e., a written assessment attesting that the design, installation and structural integrity of the tank system is adequate for the management of hazardous waste, and PE installation certification) will be sufficient to fulfill the requirements of these permit conditions for Tank 2003-F.

(4) OAC Rule 3745-273-34(E), Standards for Large Quantity Handlers of Universal Waste - Labeling/Marking: Each lamp, or each container or package in which such lamps are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)."

Sunoco accumulates universal waste spent fluorescent lamps in cardboard containers located on wooden shelves in < 90 day hazardous waste container storage building BD-908. At the time of the inspection, a "Universal Waste" sign was attached to the wooden shelf above the cardboard containers that contained spent lamps. The Individual spent lamps or the cardboard containers that held the spent lamps were not labeled.

Sunoco must submit a photograph to this office demonstrating that the universal waste spent fluorescent lamps have been labeled in accordance with the above rule; by labeling each spent lamp, or each container or package in which the spent lamps are contained with any one of the following phrases: "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)."

GENERAL COMMENTS

(a) **Aniline Unit**

Sunoco's permit application must accurately reflect current conditions at the facility. As we discussed, the Aniline Unit was permanently taken out of service in about 2004, but Sunoco's Ohio Part B Hazardous Waste Permit indicates that the Aniline Unit is still in operation. For example, the text on page B-5 of the permit application refers to the Aniline Unit, and Exhibit B-5 contains the Aniline Unit process flow diagram. Sunoco must submit a permit modification and replacement pages to update the permit application to reflect that the Aniline Unit is no longer in operation. Any text or diagrams in the permit application that are no longer accurate because of the discontinuation of the Aniline Unit should be modified or revised as necessary (*e.g.*, flow diagrams for the permitted tank systems that may have changed because wastes from the Aniline Unit are no longer are piped to these tanks, etc.).

(b) **Required Equipment**

While reviewing the Spill Clean up Supplies inspection checklists during the inspection, we noted that many items on the checklists were below the specified minimum amount for at least a few months. Some items were never at or above the specified minimum amount between June 2006 and April 2007. While a minimum amount /number of supplies is not required, Sunoco must ensure that spill clean up supplies are stocked and available in sufficient quantity to effectively respond to and clean up a spill or release in the event of an emergency. It is Ohio EPA's recommendation that Sunoco make the determination as to what quantities of spill clean up supplies will be the minimum amount in stock, and then ensure that the spill clean up supplies are maintained at or above this amount.

(c) **Testing and Maintenance of Equipment**

During our review of the Spill Response Inventory Weekly Inspection Checklist for < 90 day hazardous waste accumulation area BD-908, we noted that two sets of inspections occurred after an 8-day lapse (12/18/06 and 12/26/06) and (7/31/06 and8/8/06). Please note that these inspections should be conducted "weekly" (within 7 days of the previous inspection) as specified in Section F of the permit application, per Condition B.10 of Sunoco's Ohio Part B Hazardous Waste Permit.

(d) **< 90 Day Accumulation Area - Inspections**

During our review of the BD-908 Container Accumulation Area Inspection Checklists, we noted that one week of container accumulation area inspections was missing in March 2007.

Inspection checklists went from 3/16/07 directly to 3/28/07. Please note that these inspections should be conducted "weekly" (within 7 days of the previous inspection), as specified in OAC Rule 3745-66-74.

(e) **Inspection Checklists in Permit Application**
Ohio EPA and Sunoco have had several discussions regarding the inclusion of inspection checklists in the Part B Permit application. Specifically, we discussed the wording in the permit application in reference to the inspection checklists; whether the permit application should state "inspection checklists are included", or "example inspection checklists are included". As we discussed, the phrase "inspection checklists are included" indicates that Sunoco would need to submit a permit modification whenever the checklists are modified or updated. Ohio EPA agrees that Sunoco may use "example inspection checklists" in the permit application; however, Sunoco should include protective language in the application that states any modifications or updates Sunoco makes to the inspection checklists will not affect the items inspected and the inspection frequency will not change. The permit application should have a list and description of the inspection items and their inspection frequency.

(f) **< 90 day hazardous waste storage tank**
Tank 2108-F is a < 90 day hazardous waste storage tank operated as part of the HHC batch feed process in conjunction with permitted tanks 2104-F and 2105-F, and is subject to the Large Quantity Generator tank rules of OAC 3745-66-90 through 3745-66-99. While not required by Sunoco's permit, Ohio EPA recommends that Sunoco continue inspecting Tank 2108-F along with the permitted tanks in accordance with their scheduled in service and out of service integrity inspections.

(g) **Accumulation Time for Universal Waste -**
OAC Rule 3745-273-35 indicates that a large quantity handler of universal waste may accumulate universal wastes for no longer than one year from the date they are generated, unless the handler can demonstrate a longer time period was necessary to in order to accumulate such quantities as necessary to facilitate proper recovery, treatment, or disposal. The handler bears the burden of proving that such accumulation was necessary. Sunoco has several options to demonstrate the accumulation time of their universal wastes, which are outlined in the above rule. During the inspection, Ohio EPA reviewed Sunoco's manifests and shipping documentation to make the determination that universal wastes were regularly shipped off site and were not accumulated on-site in excess of one year.

Enclosed, you will find a copy of the checklists that were completed during the inspection. You can find copies of the hazardous waste rules and other information on our division's web page at http://www.epa.state.oh.us/dhwm. Compliance assistance and pollution prevention information is available at http://www.epa.state.oh.us/ocapp/ocapp.html.

Should you have any questions or require assistance, please feel free to call me at 740-380-5237.

Sincerely,

Vicky D. German

Vicky D. German
Environmental Specialist
Division of Hazardous Waste Management
Ohio EPA, Southeast District Office

VDG/mlm

cc: Pam McCoy, DHWM-CO-ERAS

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

OHIO PART B PERMITTED FACILITY RCRA INSPECTION CHECKLIST

Revised – March 2007

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):	April 4, 2007 (facility walk-through) April 11, 2007 (records review)		
	Name	**Affiliation**	**Telephone Number**
Inspectors:	Vicky German Pam McCoy	Ohio EPA, DHWM-SEDO Ohio EPA, DHWM-CO-ERAS	740-380-5237 614-644-3846
Facility Rep(s):	Carl Henderson Melissa Essman Paul Daniels Bernie Marshall Andrew Lett Jason Patrick	Sunoco Chemicals-Haverhill Sunoco Chemicals-Haverhill Sunoco Chemicals-Haverhill Sunoco Chemicals-Haverhill Sunoco Chemicals-Haverhill Sunoco Chemicals-Haverhill	740-533-5459 740-533-5351 740-533-5295 740-533-5250 740-533-3420 740-533-3420

Is facility operating as a generator?	☒Yes ☐No
Generator Requirements checklists attached	

PERMIT STATUS

Permit Issued:	October 29, 2001
Permit Effective Date:	October 29, 2001
Permit Expiration Date:	October 29, 2010
Permit Renewal Date:	NA
Permit Modification Date(s):	See Remarks Section , Table of Permit Modifications

AUTHORIZED PERMITTED ACTIVITIES

	STORAGE		***TREATMENT***		***DISPOSAL***
☐	Containers	☐	Tanks	☐	Injection Well
☒	Tanks	☐	Incinerator	☐	Landfill
☐	Waste Pile	☐	Thermal Treatment	☐	Land Application
☐	Surface Impoundment	☐	Post-Closure	☐	Surface Impoundment

OTHER

☐	Post-Closure Care	☒	Corrective Action
☒	Boiler Industrial Furnace (BIF)	☐	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, 2010.

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.11.(b) and A.5] ☒Yes ☐No ☐NA
   Sunoco replaced permitted > 90 day hazardous waste storage Tank 2003-F with a new tank, and placed the new tank in service on August 2, 2006. Sunoco did not submit a request to modify their Part B permit to allow for the operation of the new replacement tank until April 5, 2007. Sunoco operated new replacement Tank 2003-F from August 2, 2006 until April 5, 2007, prior to this activity being authorized by their permit.

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
   See table on p. 14 of this checklist, "Release History 2006 - Present".

   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: ☒Yes ☐No ☐NA

         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: ☐Yes ☐No ☒NA

Sunoco submitted s a written report within 15 days of the time they became aware of the circumstances.

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? **and** ☒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 from 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 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

There were instances during 2006-2007 in which Sunoco submitted permit modification requests with incorrect or missing replacement pages. The facility promptly submitted the correct pages.

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.] If 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

   b. Have such changes been made in accordance with O.A.C. Rule 3745-50-51? [Condition A.15.] ☐Yes ☐No ☒NA

SITE E[illegible]RY - 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 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 analytic[illegible]ata, and corrective action where required[illegible]m 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? ☒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

Sunoco's 2006 Annual Hazardous Waste Report was submitted 2/28/2007.

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 three years from the date of sampling, including:

   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

See Sunoco 2006 Annual Hazardous Waste Report.

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 <u>submit updates biennially</u> <u>thereafter</u>? [Condition A.29(c)] ☒Yes ☐No ☐NA

Sunoco's Biennial Waste Minimization Report was submitted 2/26/2006. The next biennial update should be submitted by October 29, 2008.

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

For Questions #3 and #4, refer to Sunoco 2006 Annual Hazardous Waste Report and 2006 Biennial Waste Minimization Report.

a. If so, what amount of waste has the Permittee reduced this year?

4. Has the Permittee's company saved much 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. Did the Permittee submit to the Ohio EPA, within sixty (60) days of permit journalization, the following documents: ☒Yes ☐No ☐NA

a. Updated financial requirements for closure of the facility and liability requirements; including cost estimate for closure as required by OAC Rule 3745-55-42, financial assurance for facility closure as required by OAC Rule 3745-55-43, and liability insurance as required by OAC Rule 3745-55-47? [Condition A.27] ☒Yes ☐No ☐NA

b. 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. Repairs to the tank's secondary containment system were done after the tank system assessment and installation certification was conducted. The PE certification for the tank system was dated 8/1/2006, but repairs to the secondary containment was under repair until 11/5/2006. A PE certification should have been submitted following the completion of the secondary containment installation and repair work in November 2006.

2. Did the Permittee submit to Ohio EPA, within 180 days of permit journalization, 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 has submitted the following out-of-service internal tank inspection reports: 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 is 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

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

Sunoco has submitted the following in-service tank inspection reports: Tank 2003-F - dated 5/04/2000; Tank 2104-F - dated 5/04/2000; Tank 2105-F - dated 5/04/2000. File documentation indicates the piping from Utilities (boilers), Phenol 1, and Aniline Unit (now out of service) to the tanks was inspected in June 2000. In-service tank inspection reports for the tanks were due to be submitted in 2005.

3. Did the Permittee, within 270 days of permit journalization (*July 26, 2002*), paint all areas of Tank 2003-F that show signs of external corrosion? [Condition A.27(b)] ☒Yes ☐No ☐NA

4. Did the Permittee, within 485 days of permit journalization (*February 26, 2003*), paint all areas of Tank 2104-F that show signs of external corrosion? [Condition A.27(c)] ☒Yes ☐No ☐NA

5. Did the Permittee, within 850 days of permit journalization (*February 26, 2003*), paint all areas of Tank 2105-F that show signs of external corrosion? [Condition A.27(d)] ☒Yes ☐No ☐NA

Sunoco painted all areas of Tank 2003-F, Tank 2104-F, and 2105-F that showed signs of external corrosion. The painting was completed on May 2, 2003. Tank 2003-F has since been replaced.

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.]? ☒Yes ☐No ☐NA

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. Rule3745-52-42? ☐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.

   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.

   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
   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.

   It was noted during the inspection that one week of inspections for <90 day Container Storage Area BD-908 was missing; checklists went from 3/16/06 directly to 3/28/06.

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 order # is entered on the inspection checklist. The work orders are maintained electronically and are available for review upon request.

5. In accordance with OAC Rule 374[illegible]4-15(D), do inspection records contain th[illegible]lowing 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 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, Section F of the permit application, and the terms and conditions of the permit? [Condition B.10] ☒Yes ☐No ☐NA

NOTE: OAC Rule 3745-54-33, Testing and Maintenance of Equipment states that all facility communication or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment shall be tested and maintained. Facility alarm system inspection procedures/checklists are located in Attachment F-5 of the Part B permit application. Fire and safety equipment inspection procedures/checklists are located in Exhibit F-2 and Attachment F-2 of the Part B permit application. Spill clean up supplies and decontamination equipment inspection procedures /checklists are located in Attachment F-3 of the Part B permit application.

We noted that on the Spill Clean up Supplies inspection checklists, many items on the checklist were below the minimum for at least a few months. Some items were never at or above the minimum amount between June 2006 and April 2007.
The Spill Response Inventory Weekly Inspection Checklist showed that the spill kit items at BD-908 were not inspected "weekly"; two sets of inspections occurred after an 8-day lapse (12/18/06 and 12/26/06) and (7/31/06 and 8/8/06).

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
   The contingency plan (Section G of the permit application) states that the Shift Supervisor on duty is the Emergency Coordinator/Incident Commander; alternates are listed in the plan.

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
   Sunoco's most recent revision to the contingency plan was in 2002. The contingency plan is reviewed annually to determine if changes are needed.

NOTE: Also see Question #4 of <u>Recordkeeping Requirements</u> 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 or equal to 55 gallons? ☒Yes ☐No ☐NA

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
07/05/2006	Phenol	Unknown	1000 P	N
10/10/2006	Acetone	1300 G	5000 P	Y
12/13/2006	Cumene/AMS	18 G	100P	Y
01/29/2007	Phenol heavy ends	0.5 G	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 groundwater or surface water contamination? ☒Yes ☐No ☐NA

d. A spill or release of hazardous waste or hazardous waste constituents that is reported to the National Response Center or local (city or county) emergency response center because the spill exceeded 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

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 <u>Recordkeeping Requirements</u> (Question #4) 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
   In January 2005, Sunoco closed < 90 day hazardous waste Tank F-94, which was not a "permitted" tank. The tank held process distillation bottoms from the Aniline Unit and pump oils that were hazardous for benzene. These wastes were either reprocessed or routed to permitted hazardous waste storage Tanks 2104-F or 2105-F and fed to the BIF units. The tank closure met the closure performance standard. Tank inspections for this tank continued into 2006 until Sunoco had Ohio EPA concurrence that the tank closure was complete and met performance standards.

   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

2. Has the Permittee implemented the approved plan for the BPA Lagoons? [Condition B.27.] ☒Yes ☐No ☐NA

a. If so, has the Permittee submitted a request to modify the permit to remove the BPA Lagoons closure plan from the permit? ☒Yes ☐No ☐NA

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

CORRECTIVE ACTION

NOTE: Currently USEPA has authority for oversight of current corrective action activities at Sunoco. Transition of corrective action authority to Ohio EPA will occur after USEPA's approval of the final RFI report, and Ohio EPA will begin oversight of Sunoco's implementation of the corrective measures process, beginning with Condition E.8 (Corrective Measures) of the Part B Permit. Any new Waste Management Units (WMUs) discovered at the facility that are not addressed under the current RFI will fall under the jurisdiction of Ohio EPA.

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

NOTE: The Permittee may demonstrate that, despite the Permittee's best efforts the Permittee was unable to obtain the necessary permission to undertake the action described in Question #2 above.

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

NOTE: The Ohio EPA inspector is required to evaluate the company's compliance with the Federal permit conditions concerning corrective actions only if the company has been included in the Grant Workplan as requiring such an evaluation.

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 <u>new</u> releases from existing WMUs that are being investigated as part of the current RFI? [Condition E.5.] ☐Yes ☒No ☐NA

In June 2006, a railcar overflow incident occurred at the Phenol Loading/unloading Rack (SWMU #53), impacting the west side of the rail track. During clean up of the phenol spill, contamination was discovered on the east side of the track, which was thought to be attributed to SWMU #53. This unit is included in the federal corrective action RFI, and per agreement with Ohio EPA and USEPA, will be addressed under the scope of the ongoing investigation under federal oversight, since it is not a new SWMU or a new release from an existing SWMU.

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

MODIFICATIONS TO OHIO PART B PERMIT (2003 to Present)			
Action Date	**Permit Action**	**Affected Permit Page(s)**	**Description of Action**
2/6/2003	**Class 3A**	Permit Title Page	Facility operator change to Sunoco, Inc. R&M. Facility name change to Sunoco Chemicals-Haverhill.
1/25/2005	**Class 1**	NA	To be eligible for Ohio's BIF Permit-by-Rule status. Modification incorporated 4 boilers into Ohio Part B Permit. Submittal included revised Part A Permit Application and BIF Certification.
7/12/2005	**Class 1**	NA	Annual financial assurance update
9/14/2005		NA	Part B Permit Application and Siting Criteria Document for incorporating 4 boilers into Ohio Part B Permit/Permit Application
12/29/2005	**Temporary Authorization**	NA	To allow burning UC under modified operating conditions until C3 mod approval
3/22/2006	**Class 1A**	Attachment 1	Extension of one additional 720-hour pretrial burn period to operate Boiler UC.
4/24/2006	**Class 1A**	Permit Title Page, 3	Extension of the permit duration from 5 years to 10 years; correction of facility owner information.
9/18/2006	**Class 1A**	Pages 2, 23, 47	Removal of the BPA Lagoons and Phenol Wastewater Treatment System Closure Plans
11/14/2006	**Class 3**	Attachment 1	Retrofit Boiler UC and perform the November 2005 Boiler UC Trial Burn Plan.
3/19/2007	**Class 3B**	Module I - Boilers of the Permit Terms and Conditions	Addition of four hazardous waste boilers to the permit.

LARGE QUANTITY GENERATOR REQUIREMENTS

CESQG: <100Kg. (Approximately 25-30 gallons) of waste in a calendar month.
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or >1 Kg. Of acutely hazardous waste in a calendar month.

Note: LQG Requirements and Permit Requirements/Terms and Conditions may overlap; therefore some requirements appear on both the Permit Checklist and the LQG Checklist.

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] ☒Yes ☐No ☐NA
2. Has the generator obtained a U.S. EPA identification number? [3745-52-12] ☒Yes ☐No ☐NA
3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] ☒Yes ☐No ☐NA
4. Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] ☐Yes ☒No ☐NA
5. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] ☐Yes ☒No ☐NA
6. Does the generator accumulate hazardous waste? ☒Yes ☐No ☐NA

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.)

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

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

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

NOTE: Complete appropriate checklist for each unit. If waste is treated to meet LDRs, complete the LDR checklist.

WASTE IMPORT/EXPORT REQUIREMENTS

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

MANIFEST REQUIREMENTS

10. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] ☒Yes ☐No ☐NA

11. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] ☒Yes ☐No ☐NA

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)]

12. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] ☒Yes ☐No ☐NA

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)].

13. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] ☐Yes ☐No ☒NA

14. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] ☒Yes ☐No ☐NA

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 of the waste they generate.

15. If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] ☐Yes ☐No ☒NA

16. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] ☐Yes ☐No ☒NA

17. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] ☒Yes ☐No ☐NA

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

PERSONNEL TRAINING

18. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] ☒Yes ☐No ☐NA

Sunoco's training program trains all employees in RCRA I (general procedures including notification of shift supervisor to implement contingency plan). RCRA II training covers more specific waste handling procedures and is given to facility personnel relevant to their positions. Additional in-depth unit-specific and job-specific training is also given to personnel, relevant to their particular responsibilities. The training program is maintained electronically; a reminder system notifies environmental staff when facility personnel are due to receive training and the dates of training for each employee are recorded in the electronic database.

19. Does the personnel training program include instructions to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] ☒Yes ☐No ☐NA

20. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] ☒Yes ☐No ☐NA

21. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] ☒Yes ☐No ☐NA

22. Does the generator provide annual refresher training to employees? [3745-65-16(C)] ☒Yes ☐No ☐NA

23. Does the generator keep records including: job titles [D(1)], job descriptions [D(2)], type and amount of training given to each person [D(3)] and documentation of completed training or job experience required [D(4)]? [3745-65-16(D)] ☒Yes ☐No ☐NA

24. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] ☒Yes ☐No ☐NA

CONTINGENCY PLAN

25. Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] ☒Yes ☐No ☐NA

26. Does the plan describe the following:

    a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? ☒Yes ☐No ☐NA

    b. Arrangements with emergency authorities [3745-65-52(C)]. ☒Yes ☐No ☐NA

    c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] ☒Yes ☐No ☐NA

    d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] ☒Yes ☐No ☐NA

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

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

27. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] ☒Yes ☐No ☐NA
Copies of the contingency plan are provided to emergency authorities. A copy of the contingency plan is located in each Control Room.

28. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] ☒Yes ☐No ☐NA

29. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] ☒Yes ☐No ☐NA

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

30. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: ☒Yes ☐No ☐NA

    a. Was the contingency plan implemented? [3745-65-51(B)] ☒Yes ☐No ☐NA

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

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

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

31. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] ☒Yes ☐No ☐NA

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

    a. Internal alarm system? [3745-65-32(A)] ☒Yes ☐No ☐NA

    b. Emergency communication device? [3745-65-32(B)] ☒Yes ☐No ☐NA

    c. Portable fire control, spill control and decontamination equipment? [3745-65-32(C)] ☒Yes ☐No ☐NA

    d. Water of adequate volume/pressure? [3745-65-32(D)] ☒Yes ☐No ☐NA

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

33. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] ☒Yes ☐No ☐NA
    See Permit Checklist.

34. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] ☒Yes ☐No ☐NA
    See Permit Checklist.

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

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

37. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] ☒Yes ☐No ☐NA

38. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] ☒Yes ☐No ☐NA

39. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] ☒Yes ☐No ☐NA

SATELLITE ACCUMULATION AREA REQUIREMENTS

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

    a. Are at or near a point of generation? [3745-52-34(C)(1)]

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

    Sunoco's satellite accumulation drums are closed by a locking rim; this is covered by a "false lid" to keep rainfall off the top of the drum.

    c. Do not exceed one quart of acutely hazardous waste at anyone time? [3745-52-34(C)(1)] ☒Yes ☐No ☐NA

    d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] ☒Yes ☐No ☐NA

    e. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] ☒Yes ☐No ☐NA

41. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: ☒Yes ☐No ☐NA

    a. Did the generator comply with 3745-52-34(A)(1)through(4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] ☒Yes ☐No ☐NA

    b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] ☒Yes ☐No ☐NA

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

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 then 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

42. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] ☒Yes ☐No ☐NA

    Waste codes are added to "Hazardous Waste" labels and waste descriptions on containers in the <90 day container storage area prior to being shipped off-site.

43. Is the accumulation date on each container? [3745-52-34(A)(2)] ☒Yes ☐No ☐NA

44. Are hazardous wastes stored in containers which are:

    a. Closed (except when adding/removing wastes)? [3745-66-73(A)] ☒Yes ☐No ☐NA

    b. In good condition? [3745-66-71] ☒Yes ☐No ☐NA

    c. Compatible with wastes stored in them? [3745-66-72] ☒Yes ☐No ☐NA

    d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] ☒Yes ☐No ☐NA

45. Is the container accumulation areas(s) inspected weekly? [3745-66-74] ☒Yes ☐No ☐NA
Note: Per ORC§1.44(A) "Week" means seven (7) consecutive days.
One week of container accumulation area inspections for BD-908 was missing for March 2007. Inspection checklists went from 3/16/07 directly to 3/28/07.

a. Are inspections recorded in a log or summary? [3745-66-74] ☒Yes ☐No ☐NA

46. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] ☒Yes ☐No ☒NA

47. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] ☒Yes ☐No ☐NA

48. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] ☐Yes ☐No ☒NA

49. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] ☐Yes ☐No ☒NA

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.

GENERATOR CLOSURE REQUIREMENTS

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

NOTE: Please provide a description of the unit and documentation provided by the generator 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]

See Permit Checklist.

PRE-TRANSPORT REQUIREMENTS

51. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] ☒Yes ☐No ☐NA

52. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] ☒Yes ☐No ☐NA

53. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] ☒Yes ☐No ☐NA

ADDITIONAL REMARKS

LDR REQUIREMENTS

GENERAL LDR REQUIREMENTS

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

   a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)] ☒Yes ☐No ☐NA

   b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)] ☒Yes ☐No ☐NA

2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2),Table 1] ☒Yes ☐No ☐NA

3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] ☒Yes ☐No ☐NA

4. Does the generator generate a characteristic hazardous waste? If so: ☒Yes ☐No ☐NA

   a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] ☒Yes ☐No ☐NA

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

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so: ☒Yes ☐No ☐NA

   a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] ☒Yes ☐No ☐NA

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

6. Has the generator correctly determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)] ☒Yes ☐No ☐NA

NOTE: ***Wastes with EPA hazardous waste numbers K174 and K175 (chlorinated aliphatic wastes) have specific requirements in rule 3745-270-33. Waste with EPA hazardous waste numbers K176, K177 and K178 (inorganic chemical wastes) have specific requirements in rule 3745-270-36.***

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] ☒Yes ☐No ☐NA

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

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

NOTE: ***In other words, is combustion a legitimate treatment method?***

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] ☐Yes ☒No ☐NA

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] If so: ☐Yes ☒No ☐NA

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

11. Does the facility have an extension to allow for a restricted waste to be land disposed? [3745-270-06] If so: ☐Yes ☒No ☐NA

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

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? If so: ☐Yes ☒No ☐NA

    a. Has the facility complied with 3745-270-04? ☐Yes ☐No ☒NA

NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator's waste or contaminated **soil does not meet the treatment standards**, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)] ☒Yes ☐No ☐NA

14. If a generators' waste or contaminated soil **meets the treatment standard at the original point of generation**, does the generator have:

    a. a copy of the one-time written notice accompanying the initial shipment of waste to each treatment, storage, or disposal facility receiving the waste? [3745-270-07(A)(3)] ☐Yes ☐No ☐NA

    b. the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)] ☐Yes ☐No ☐NA

15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)] ☐Yes ☐No ☒NA

16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)] ☐Yes ☐No ☒NA

17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so: ☐Yes ☒No ☐NA

    a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] ☐Yes ☐No ☒NA

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

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

GENERATORS TREATING HAZARDOUS WASTE

1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40? ☐Yes ☒No ☐NA

2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)] ☐Yes ☐No ☒NA

    a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)] ☐Yes ☐No ☒NA

b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] ☐Yes ☐No ☒NA

3. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] ☐Yes ☐No ☒NA

4. Has the generator followed their WAP [3745-270-07(A)(5)? ☐Yes ☐No ☒NA

5. Have the treated wastes met the applicable treatment standards in 3745-270-40? ☐Yes ☐No ☒NA

6. Has the generator sent a notification and certification with the initial shipment of waste?[3745-270-07(A)(5)(c)] ☐Yes ☐No ☒NA

7. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)] ☐Yes ☐No ☒NA

8. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following: ☐Yes ☐No ☒NA

   a. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] ☐Yes ☐No ☒NA

   b. A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)] ☐Yes ☐No ☒NA

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

9. Has the process/operation generating the waste or the solid waste landfill facility changed? If so: ☐Yes ☐No ☒NA

   a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)] ☐Yes ☐No ☒NA

   b. Has the director been notified of such changes? [3745-270-09(D)] ☐Yes ☐No ☒NA

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

10. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: ☐Yes ☐No ☒NA

    a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49 (C)] ☐Yes ☐No ☒NA

11. Does each notification/certification form completed, contain the information found in Table1? [3745-270-07(A)(3)] ☐Yes ☐No ☒NA

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

HAZARDOUS DEBRIS

1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)? ☐Yes ☒No ☐NA

2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.) ☐Yes ☐No ☒NA

3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so: ☐Yes ☐No ☒NA

   a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)] ☐Yes ☐No ☒NA

NOTE: ***If immobilization has been used in a treatment train, it must be the last treatment technology used.***

4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so ☐Yes ☐No ☒NA

   a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)] ☐Yes ☐No ☒NA

5. Is the waste a PCB waste under 40 CFR Part 761? If so: ☐Yes ☐No ☒NA

   a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)] ☐Yes ☐No ☒NA

6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)] ☐Yes ☐No ☒NA

7. Does the owner/operator of a treatment facility that claims the debris is excluded from regulation as a hazardous waste under 3745-51-03(F)(1) maintain the following information? ☐Yes ☐No ☒NA

   a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)] ☐Yes ☐No ☒NA

   b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)] ☐Yes ☐No ☐NA

   c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)] ☐Yes ☐No ☒NA

8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F)(1) have the following information? [3745-270-07(D)(3)] ☐Yes ☐No ☒NA

   a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)] ☐Yes ☐No ☒NA

   b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)] ☐Yes ☐No ☒NA

   c. Technology used from Table 1? [3745-270-07(D)(1)(c)] ☐Yes ☐No ☒NA

9. Has the above notification been sent to the director? [3745-270-07(D)(1)] ☐Yes ☐No ☒NA

TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS

1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-13?[3745-270-07(B)] ☐Yes ☐No ☒NA

2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)] ☐Yes ☐No ☒NA

Note: ***No further notification is necessary until such time that the waste changes or the receiving facility changes.***

3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07?[3745-270-07(B)(3)] ☐Yes ☐No ☒NA

4. Are wastes or treatment residues being sent to another TSD to be further managed? If so: ☐Yes ☐No ☒NA

   a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)] ☐Yes ☐No ☒NA

5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? If so: ☐Yes ☐No ☒NA

   a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)], excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)] ☐Yes ☐No ☒NA

b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4)[3745-270-07(B)(6)] ☐Yes ☐No ☒NA

c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B))(6)] ☐Yes ☐No ☒NA

6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)] ☐Yes ☐No ☒NA

7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have: ☐Yes ☐No ☒NA

a. Copies of all notices and certifications required in 3745-270? ☐Yes ☐No ☒NA

b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49? ☐Yes ☐No ☒NA

c. The testing frequency specified in the facility's WAP and have they followed the protocol? ☐Yes ☐No ☒NA

ADDITIONAL REMARKS

TANK SYSTEM REQUIREMENTS

New Tank System - Installation commencing after July 14, 1986.
Existing Tank System - Installation or operation commencing on/before July 14, 1986.

NOTES:
Secondary containment must be provided for all new tank systems or components, prior to their being put into service. [3745-66-93(A)(1)]
*For an existing tank system(s) of **known and documentable age** secondary containment is required to be provided within two years after January 12, 1987, or when the tank system has reached 15 years of age, whichever came later. [3745-66-93(A)(3)]*
*Secondary containment is required for all existing tanks for which the **age cannot be documented**. The tanks were required to have secondary containment within eight years of January 12, 1987 or when the facility turned 15 years of age, whichever came later. [3745-66-93(A)4)]*
Tank systems that store/treat materials that become hazardous waste after January 12, 1987 must have secondary containment required within the time intervals in OAC 3745-66-93(A)(1) to (A)(4). The date the material became a hazardous waste must be used in place of January 12, 1987. [3745-66-93(A)(5)]
If the tank system has no secondary containment, or a variance from secondary containment requirements has been granted, skip to Tank Systems Without Secondary Containment.

1. For an existing or new tank system(s), has secondary containment been provided? [3745-66-93(A)(1) to (A)(5)] ☒Yes ☐No ☐NA

   Permitted > 90 day storage tanks 2104-F and 2105-F are existing tank systems greater than 15 years of age (installed in 1968). Permitted > 90 day storage tanks 2003-F was taken out of service and replaced with a new tank in 2006. The 3 permitted tanks hold wastes that are continuously purged from the process lines during distillation and refining. 2003-F holds light hydrocarbon impurities (D001/D018/D035); 2104-F and 2105-F hold heavy residual hydrocarbon waste (K022). The wastes in these tanks are piped to the industrial boilers. The permitted tanks all have a double steel bottom, with a leak detection mechanism between the tank bottoms. < 90 day Tank 2108-F is a batch feed tank associated with the Tank 2104-F and Tank 2105-F (heavy ends) system.

2. Is the secondary containment one of the following:

   a. **External Liner?** [3745-66-93(E)(1)(a) - (1)(f)] If so, ☒Yes ☐No ☐NA

      i. Is the liner designed or operated to contain 100% of the capacity of the largest tank? ☒Yes ☐No ☐NA

      ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? ☒Yes ☐No ☐NA

   Emergency containment (dike) capacity calculations are presented in Attachment D-8 (Tank System Assessments and Certifications) of the approved Part B permit application, and in the Tank and Piping Assessment dated August 2000. Permitted > 90 day storage tank 2003-F is in a secondary containment by itself where no other tanks are present. The total secondary containment capacity is 276,589.69 gallons, which accounts for the volume of the tank plus the run on from a 25 year, 24-hour storm (4½ inches).
   Permitted > 90 day storage tanks 2104-F and 2105-F share a common secondary containment secondary containment, along with the < 90-day tank batch feed tank, 2108-F. The total secondary containment capacity is 709,315.03 gallons, which accounts for the volume of the largest tank in the containment area, the run on from a 25 year, 24-hour storm (4½ inches), and the displacement of the other tanks in the containment area.

iii. Is liner free of cracks and gaps? ☒Yes ☐No ☐NA

iv. Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release? ☒Yes ☐No ☐NA

v. Are chemically resistant water stops in place at all joints? (concrete liners only) ☒Yes ☐No ☐NA

vi. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? (concrete liners only) ☒Yes ☐No ☐NA

b. **Vault System?** [3745-66-93(E)(2)(a) - (2)(f)] If so, ☐Yes ☒No ☐NA

i. Is vault system designed to contain 100% of the capacity in the largest tank? ☐Yes ☐No ☒NA

ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? ☐Yes ☐No ☒NA

iii. Are chemically resistant water stops in place at all joints? ☐Yes ☐No ☒NA

iv. Is there a compatible interior coating to prevent migration into the concrete? ☐Yes ☐No ☒NA

v. For **ignitable or reactive waste**: Is the vault system provided with means to prevent against the formation or ignition of vapors? ☐Yes ☐No ☒NA

vi. Is vault system provided with an exterior moisture barrier? ☐Yes ☐No ☒NA

c. **Double-Walled Tank?** [3745-66-93(E)(3)(a) - (3)(c)] If so, ☐Yes ☒No ☐NA

i. Is double-walled tank designed as an integral structure to contain any release from the inner tank? ☐Yes ☐No ☒NA

ii. **If metal**, are the primary tank interior and outer shell exterior surfaces protected from corrosion? ☐Yes ☐No ☒NA

iii. Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time? ☐Yes ☐No ☒NA

3. Is the secondary containment system for the tank(s) an equivalent device as described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D)(E)] ☐Yes ☐No ☒NA

SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION (OAC 3745-66-93(B)(C))

4. Has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulated liquids? [3745-66-93(B)] ☒Yes ☐No ☐NA

5. Does the secondary containment system meet the following minimum requirements of 3745-66-93(C):

a. Constructed or lined with compatible materials of sufficient strength to prevent failure? ☒Yes ☐No ☐NA

b. Placed on a foundation or base capable of providing support? ☒Yes ☐No ☐NA

c. Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time? ☐Yes ☐No ☐NA

d. Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? ☐Yes ☐No ☐NA

e. Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner? ☐Yes ☐No ☐NA

ANCILLARY EQUIPMENT REQUIREMENTS (OAC 3745-66-93(F))

10. Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)? ***If not***, is the ancillary equipment: ☐Yes ☒No ☐NA

a. Inspected daily? **AND**; ☒Yes ☐No ☐NA

b. Is ancillary equipment one of the following:

i. Above ground piping (exclusive of flanges, joints, valves and connections)? ☒Yes ☐No ☐NA

ii. Welded flanges, welded joints and/or welded connections? ☐Yes ☒No ☐NA

iii. Sealless or magnetic coupling pumps and/or sealless valves? ☐Yes ☒No ☐NA

iv. Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown, and/or loss of pressure-actuated shut-off devices)? ☒Yes ☐No ☐NA

NEW TANK SYSTEM REQUIREMENTS (OAC 3745-66-92)

Sunoco has installed 2 "new" tanks. Permitted > 90 day storage tank 2003-F was taken out of service and replaced with a new tank in 2006. Tank 2108-F, installed in 1997, is a < 90 day tank hazardous waste storage tank that operates as a batch feed tank to facilitate heavy ends (K022/D018/D035) waste sampling prior to being burned in the BIF units.

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

Sunoco has written assessments for Tanks 2104-F 2105-F, and 2108-F. However, Sunoco must submit a written assessment for the installation of replacement tank 2003-F for Ohio EPA review. (See permit checklist).

12. Does the written assessment include the following: [OAC 3745-66-92(A)]

a. Certification by an independent, registered, professional engineer? ☐Yes ☒No ☐NA

b. Consideration of the design standards of the system? ☐Yes ☒No ☐NA

c. Consideration of the hazardous characteristics of the waste(s)? ☐Yes ☒No ☐NA

d. An evaluation by a corrosion expert *(if the external system/components are metal)*? ☐Yes ☒No ☐NA

e. A determination of design and operational measures that will be needed to protect the tank system from potential damage *(for underground tank components)*? ☐Yes ☒No ☐NA

f. Design considerations to ensure that the tank foundations will maintain the load of a full tank? ☐Yes ☒No ☐NA

g. Design considerations for anchoring the unit to prevent floatation *(for tanks situated in a seismic fault zone or saturated zone)*? ☐Yes ☒No ☒NA

h. Design considerations to ensure that the tank system will withstand the effects of frost heave *(for underground tank systems)*? ☐Yes ☒No ☒NA

Sunoco has written assessments for Tanks 2104-F 2105-F, and 2108-F. However, Sunoco must submit a written assessment for the installation of replacement tank 2003-F for Ohio EPA review. (See permit checklist).

13. Are there written statements by those person who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)] ☐Yes ☒No ☐NA

Sunoco has written assessments for Tanks 2104-F 2105-F, and 2108-F. However, Sunoco must submit a written assessment for the installation of replacement tank 2003-F for Ohio EPA review. (See permit checklist).

14. Do the written statements address all of the following:

a. Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)] ☐Yes ☒No ☐NA

b. Statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)] ☐Yes ☒No ☐NA

c. Proper backfilling? [3745-66-92(C)] ☐Yes ☒No ☐NA

d. Tightness test; if the tank was found not to be tight, does the statement indicate that proper repairs were made? [3745-66-92(D)] ☐Yes ☒No ☐NA

e. Proper support and protection of ancillary equipment? [3745-66-92(E)] ☐Yes ☒No ☐NA

f. Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)] ☐Yes ☒No ☐NA

Sunoco has written assessments for Tanks 2104-F 2105-F, and 2108-F. However, Sunoco must submit a written assessment for the installation of replacement tank 2003-F for Ohio EPA review. (See permit checklist).

TANK SYSTEMS WITHOUT SECONDARY CONTAINMENT (OAC 3745-66-91)

15. For existing tank system, without secondary containment: Is there a written assessment on file which includes the following considerations: [3745-66-91(A)(B)]

a. Design standards? [3745-66-91(B)(1)] ☐Yes ☐No ☒NA

b. The characteristics of hazardous waste(s) that have been or will be handled? [3745-66-91(B)(2)] ☐Yes ☐No ☒NA

c. Corrosion protection measures? [3745-66-91(B)(3)] ☐Yes ☐No ☒NA

d. The age of the tank system has been estimated or documented? [3745-66-91(B)(4)] ☐Yes ☐No ☒NA

e. A leak test has been conducted? *(For non-enterable underground tanks)* [3745-66-91(B)(5)(a)] ☐Yes ☐No ☒NA

f. A leak test or an internal inspection by qualified P.E. has been conducted? *(For other than non-enterable underground tanks and for ancillary equipment)* [3745-66-91(B)(5)(b)] ☐Yes ☐No ☒NA

g. Is assessment certified by an independent, registered P.E.? [3745-66-91(A)] ☐Yes ☐No ☒NA

16. Have the tests specified in 1e and 1f been conducted annually on the tanks and ancillary equipment until secondary containment is provided? [3745-66-93(I)] ☐Yes ☐No ☒NA
If so,

a. Have tests been certified by an independent, registered P.E.? ☐Yes ☐No ☒NA

17. For tanks without secondary containment used to store or treat wastes which become hazardous wastes after July 14, 1986, has the assessment been completed within 12 months of the date the waste became a hazardous waste? [3745-66-91(C)] ☐Yes ☐No ☒NA

TANK SYSTEM - GENERAL OPERATING REQUIREMENTS (OAC 3745-66-94)

18. Does the o/o follow the general operating requirements below:

a. Does the o/o prevent placement of hazardous waste or treatment reagents in tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail? [3745-66-94(A)] ☒Yes ☐No ☐NA

b. Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)? [3745-66-94(B)] ☒Yes ☐No ☐NA

c. If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96? [3745-66-94(C)] ☒Yes ☐No ☐NA

TANK SYSTEM - INSPECTION REQUIREMENTS (OAC 3745-66-95)

19. Has the o/o documented the inspections required in 3745-66-95, in the operating record, including inspection of the following:

a. Spill control equipment (daily)? [3745-66-95(A)(1)] ☒Yes ☐No ☐NA

b. Above ground portion of tank (daily)? [3745-66-95(A)(2)] ☒Yes ☐No ☐NA
Permitted > 90 day storage tank systems 2104-F, 2105-F, and 2003-F are inspected daily basis, and the nspections are recorded in a log. Items that are visually inspected include, but are not limited to: tank level, tank construction (for evidence of corrosion, cracks, external evidence of leaks, etc.) secondary containment (for evidence of cracks or breaks in concrete floor or dike wall, etc.) suction lines from storage tanks to fuel oil pumps including line block valves), and other ancillary equipment and valves, and leak detection system (tell tale valves between tank bottoms).

c. Data from leak detection equipment (daily)? [3745-66-95(A)(3)] ☒Yes ☐No ☐NA

d. Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste (daily)? [3745-66-95(A)(4)] ☒Yes ☐No ☐NA

e. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(B)(1)] ☐Yes ☐No ☒NA

f. Where applicable, all sources of impressed current at least bi-monthly? [3745-66-95(B)(2)] ☐Yes ☐No ☒NA

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES (OAC 3745-66-98 AND 3745-66-99)

20. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with **one of the following:** [3745-66-98(A)]

a. Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-65-17(B)? [3745-66-98(A)(1)]; **OR** ☐Yes ☐No ☒NA

b. Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A)(2)]; **OR** ☐Yes ☐No ☒NA

c. The tank is used solely for emergencies? [3745-66-98(A)(3)] ☐Yes ☐No ☒NA

21. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (1996)? [3745-66-98(B)] ☐Yes ☐No ☒NA

22. Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material? [3745-66-99] ☐Yes ☐No ☒NA

a. ***If so,*** have the requirements of 3745-65-17(B) been met? ☐Yes ☐No ☒NA

TANK SYSTEM - WASTE ANALYSIS REQUIREMENTS (OAC 3745-66-100)

23. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-100] ☐Yes ☐No ☒NA

a. Conducted waste analysis and trial treatment or storage tests? [3745-66-100(A)]; **OR** ☐Yes ☐No ☒NA

b. Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-100(B)] ☐Yes ☐No ☒NA

TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE (OAC 3745-66-96)

24. Has there been a leak or spill from any tank system or has any tank system been found unfit for use? ***If so***, did the o/o: ☒Yes ☐No ☐NA

a. Immediately cease flow of material into tank and investigate the cause of the release? [3745-66-96(A)] ☒Yes ☐No ☐NA

b. Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time? [3745-66-96(B)(1)] ☒Yes ☐No ☐NA

c. Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment? [374566-96(B)(2)] ☒Yes ☐No ☐NA

d. Immediately conduct a visual inspection of the release? [3745-66-96(C)] ☒Yes ☐No ☐NA

e. Prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C)(1)] ☒Yes ☐No ☐NA

f. Properly dispose of any visibly contaminated soil or surface water? [3745-66-6(C)(2)] ☒Yes ☐No ☐NA

g. Report the release to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)(2)] ☒Yes ☐No ☐NA

h. Submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)] ☒Yes ☐No ☐NA

i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)] ☒Yes ☐No ☐NA

j. For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)] ☐Yes ☐No ☒NA

NOTE: The requirements noted 1.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.

25. In the event that the repairs to the tank system were major (replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from an independent, registered P.E. attesting that the repaired unit is capable of handling hazardous waste? [3745-66-96(F)] ☐Yes ☐No ☒NA

a. Was a copy of the certification submitted to the director within seven days after returning the system to use? [3745-66-96(F)] ☐Yes ☐No ☒NA

26. If the o/o was unable to repair and return the unit to service as described in 1.a through 1.e, was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)] ☐Yes ☐No ☒NA

27. Does the o/o have a tank system **with a variance from secondary containment** from which a release has occurred but <u>has not</u> migrated beyond the zone of engineering control? **If so,** ☐Yes ☒No ☐NA

a. Has the o/o complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G)(3)] ☐Yes ☐No ☒NA

b. If soils cannot be contaminated/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)] ☐Yes ☐No ☒NA

28. Does the o/o have a tank system **with a variance from secondary containment** from which a release occurred and <u>has</u> migrated from the zone of engineering control? **If so,** ☐Yes ☒No ☐NA

a. Has the o/o complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)] ☐Yes ☐No ☒NA

b. If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(4)] ☐Yes ☐No ☒NA

USED OIL GENERATOR REQUIREMENTS

NOTE: This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: ☐Yes ☒No ☐NA

   a. Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] ☐Yes ☒No ☐NA

2. Is used oil being used as a dust suppressant? [3745-279-12(B)] ☐Yes ☒No ☐NA

3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? ☐Yes ☐No ☒NA

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] ☐Yes ☐No ☒NA

5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] ☐Yes ☐No ☒NA

6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] ☒Yes ☐No ☐NA

7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] ☒Yes ☐No ☐NA

8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] ☒Yes ☐No ☐NA

9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]

   a. Stopped the release? ☒Yes ☐No ☐NA

   b. Contained the release? ☒Yes ☐No ☐NA

   c. Cleaned up and properly managed the used oil and other materials? ☒Yes ☐No ☐NA

   d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? ☒Yes ☐No ☐NA

10. Does the generator burn used oil i[illegible]ed fired space heaters? [3745-279-23] If [illegible] ☐Yes ☒No ☐NA

    a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? ☐Yes ☐No ☒NA

    b. Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour? ☐Yes ☐No ☒NA

    c. Are the combustion gases from heater vented to the ambient air? ☐Yes ☐No ☒NA

11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] ☒Yes ☐No ☐NA

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] ☐Yes ☐No ☒NA

13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] ☐Yes ☐No ☒NA

14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] ☐Yes ☐No ☒NA

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] ☒Yes ☐No ☐NA

ADDITIONAL REMARKS

LARGE QUANTITY UNIVERSAL WASTE HANDLER INSPECTION CHECKLIST

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg (11023 P) or more
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg (11023 P) or less

GENERAL REQUIREMENTS

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

PROHIBITIONS

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

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES

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

   If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-33(A)(2)] ☐Yes ☐No ☒NA

7. If the electrolyte is removed or ot[illegible] wastes generated, has it been determine[illegible] whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)] ☐Yes ☐No ☒NA

   a. If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)] ☐Yes ☐No ☒NA

   b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)] ☐Yes ☐No ☐NA

8. Are the batteries or containers of batteries labeled with the words "Universal Waste-Batteries", "Waste Batteries", or "Used Batteries"? [3745-273-34(A)] ☒Yes ☐No ☐NA

UNIVERSAL WASTE PESTICIDES

9. Does the LQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-33(B)(1)] ☐Yes ☐No ☒NA

10. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-33(B)(2)] ☐Yes ☐No ☒NA

11. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 66-992, except for paragraph (C) of 3745-66-97; rule 3745-66-991 and 3745-66-992 of the OAC met? [3745-273-33(B)(3)] ☐Yes ☐No ☒NA

12. Is pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-33(B)(4)] ☐Yes ☐No ☒NA

13. Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)] ☐Yes ☐No ☒NA

14. Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)] ☐Yes ☐No ☒NA

Sunoco does not generate waste pesticides.

UNIVERSAL WASTE THERMOSTATS

15. Are thermostats that show evidence of leakage, spillage or damage that could cause leaks, properly contained? [3745-273-33(C)(1)] ☒Yes ☐No ☐NA

16. If the thermostats are contained, are the containers closed, structurally sound, compatible with contents of the thermostats and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(C)(1)] ☒Yes ☐No ☐NA

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

a. Remove the ampules in a manner to prevent breakage, and is the removal done over a containment device? [3745-273-33(C)(2)(a)(b)] ☐Yes ☐No ☒NA

b. Have a clean-up system readily available to transfer spilled material to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-33(C)(2)(c)(d)] ☐Yes ☐No ☒NA

c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-33(C)(2)(e)] ☐Yes ☐No ☒NA

d. Ensure employees are thoroughly familiar with proper waste handling and emergency procedures? [3745-273-33(C)(2)(f)] ☐Yes ☐No ☒NA

e. Ensure removed ampules are stored in closed, non-leaking containers that are in good condition? [3734-273-33(C)(2)(g)] ☐Yes ☐No ☒NA

f. Pack removed ampules in containers with packing material to prevent breaking during storage, handling and transportation? [3745-273-33(C)(2)(h)] ☐Yes ☐No ☐NA

18. If mercury or clean-up residues resulting from spills or leaks or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-33(C)(3)(a)] ☒Yes ☐No ☐NA

a. If the waste is characteristic, was it managed in compliance with 3745-50 through 3745-69? (The handler is considered the generator of the mercury, residues, and/o other waste and is subject to Chapter 3745-52) [3745-273-33(C)(3)(b)] ☒Yes ☐No ☐NA

b. If the mercury, residues and/or other waste are not hazardous, are they managed in compliance with applicable law? [3745-273-33(C)(3)(c)] ☒Yes ☐No ☐NA

19. Are the thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostats", "Waste Mercury Thermostats", or "Used Mercury Thermostats"? [3745-273-34] ☒Yes ☐No ☐NA

Sunoco occasionally generates mercury thermostats/switches. Other mercury-containing wastes generated by the facility are managed as hazardous wastes characteristic for mercury (D009).

UNIVERSAL WASTE LAMPS

20. Does the LQUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(D)(1) ☒Yes ☐No ☐NA

21. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous constituents to the environment? [3745-273-33(D)(2)] ☒Yes ☐No ☐NA

22. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)", or "Waste Lamp(s)", or "Used Lamps"? [3745-273-34(E)] ☐Yes ☒No ☐NA

Sunoco's cardboard containers that held universal waste spent fluorescent bulbs were not labeled. A sign that read "Universal Waste" was attached to the wooden shelf above the cardboard containers of lamps.

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

ACCUMULATION TIME

23. Is the waste accumulated for less than one year? [3745-273-35(A)] ☒Yes ☐No ☐NA

    a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on handler to demonstrate) [3745-273-35(B)] ☐Yes ☒No ☐NA

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

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

    a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-35(C)(1)] ☐Yes ☒No ☐NA

    b. Marking or labeling the individual item of universal waste with the date that it became a waste or was received? [3745-273-35(C)(2)] ☐Yes ☒No ☐NA

    c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-35(C)(3)] ☒Yes ☐No ☐NA

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

    e. Placing the universal waste in a specific accumulation area and identifying the earliest that any universal waste in the area became a waste or was received? [3745-273-35(C)(5] ☒Yes ☐No ☐NA

    f. Any other method which clearly demonstrates the length of time the universal waste has been accumulated from the date it became a waste or is received? [3745-273-35(C)(6)] ☐Yes ☐No ☒NA

EMPLOYEE TRAINING

25. Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36] ☒Yes ☐No ☐NA

RESPONSE TO RELEASES

26. Were releases of universal waste and other residues immediately contained? [3745-273-37(A)] ☐Yes ☐No ☒NA

    No observable evidence of releases of universal waste were noted during the inspection. No documented releases of universal waste in operating record or Container Storage Area inspection logs (where Universal Wastes are stored).

27. Was the released material characterized? [3745-273-37(B)] ☐Yes ☐No ☒NA

28. If the released material was a hazardous waste, was it managed as required in OAC 3745-50 through 3745-69? *(If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52)* [3745-273-37(C)] ☐Yes ☐No ☒NA

OFF-SITE SHIPMENTS

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

29. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)] ☒Yes ☐No ☐NA

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

30. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-38(C)] ☒Yes ☐No ☐NA

31. Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)] ☒Yes ☐No ☐NA

32. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:

    a. Receive the waste back? [3745-273-38(E)(1)] ☐Yes ☐No ☒NA

    b. Agree to where shipment will be sent? [3745-273-38(E)(2)] ☐Yes ☐No ☒NA

33. If a handler rejects a partial or full load from another handler, does the receiver handler contact the originating handler and discuss one of the following:

    a. Sending the waste back to originating handler? [3745-273-38(F)(1)] ☐Yes ☐No ☒NA

    b. Sending the shipment to a destination facility? [3745-273-38(F)(2)] ☐Yes ☐No ☒NA

34. If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)] ☐Yes ☐No ☒NA

35. If the handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-38(H)] ☐Yes ☐No ☒NA

TRACKING UNIVERSAL WASTE SHIPMENTS

36. Are universal waste received from another handler? If so: ☐Yes ☒No ☐NA

    a. Is a record of each shipment kept? [3745-273-39(A)] ☐Yes ☐No ☒NA

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

37. Does the record include the following:

    a. Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)] ☐Yes ☐No ☒NA

    b. Quantity of each type of universal waste? [3745-273-39(A)(2)] ☐Yes ☐No ☒NA

    c. Date received? [3745-273-39(A)(3)] ☐Yes ☐No ☒NA

38. Is universal waste shipped to another handler? If so: ☐Yes ☒No ☐NA

a. Is a record of each shipment kept? [3745-273-39(B)] ☐Yes ☐No ☒NA

39. Does the record include the following? ☐Yes ☐No ☒NA

a. Name and address of universal waste handler, destination facility, or foreign destination? [3745-273-39(B)(1)] ☐Yes ☐No ☒NA

b. Quantity of each type of universal waste? [3745-273-39(B)(2)] ☐Yes ☐No ☒NA

c. Date shipped? [3745-273-39(B)(3)] ☐Yes ☐No ☒NA

40. Are records kept for three years? [3745-273-39(C)(1)(2)] ☐Yes ☐No ☒NA

EXPORTS

41. Is waste being sent to a foreign destination? If so: ☐Yes ☒No ☐NA

a. Does the large quantity handler comply with primary exporter requirements in OAC rules 3745-52-53 and 3745-52-57, and paragraphs (A)(1) - (A)(6) and (B) of 3745-52-56? [3745-273-40(A)] ☐Yes ☐No ☒NA

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA "Acknowledgment of Consent" 37845-52-50 to -52-57? [3745-273-40(B)] ☐Yes ☐No ☒NA

c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)] ☐Yes ☐No ☒NA

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 Month**	**Type of Accumulation/ Storage**	**Type of On-Site Treatment**	**Waste Location**	**Name, state, and type of activity**
Phenol production process	Mixed phenol column bottoms - HHC (heavy ends and tars)	D018 K022	1,988,851 P	Permitted >90 Day Tanks 2104-F, 2105-F < 90 Day Tank 2108-F	Burned in BIF Use as fuel	Permitted >90 Day Tanks and one < 90 Day Tank	NA , Burned in BIF
Phenol production process	Mixed phenol column bottoms - LHC (light ends and oils)	D001 D018 D035	452,708 P	Permitted >90 Day Tank 2003-F	Burned in BIF Use as fuel	Permitted >90 Day Tank 2003-F	NA , Burned in BIF
Phenol production process	Mixed phenol column bottoms - HHC Not burned in BIF	D018 K022	1,988,851 P	Permitted >90 Day Tanks 2104-F, 2105-F < 90 Day Tank 2108-F	Burned in BIF Use as fuel	Permitted >90 Day Tanks and one < 90 Day Tank	Onyx; West Carrollton OH - Fuel blending
Phenol production process	Mixed phenol column bottoms - LHC Not burned in BIF	D001 D018 D035	452,708 P	Permitted >90 Day Tank 2003-F	Burned in BIF Use as fuel	Permitted >90 Day Tank 2003-F	Onyx; West Carrollton OH - Fuel blending
Process equipment clean out	Boiler firebox deposits (ash)	K022 D007	1734 P	< 90 Day roll off box	NA	Near BD-908 <90Day Accumulation Area	Onyx; West Carrollton OH - Fuel blending

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 Month	Type of Accumulation/ Storage	Type of On-Site Treatment	Waste Location	Name, state, and type of activity
Process equipment clean out	Waste acetone	D001 D018 F003	87 P	55-gal. drums	NA	BD-908 <90Day Accumulation Area	Onyx; West Carrollton OH - Fuel blending
Process equipment clean out	Metal debris (scale, scrap) contaminated with heavy ends	D007 K022	2995 P	< 90 Day roll off box	NA	Near BD-908 <90Day Accumulation Area	Michigan Disposal; Belleville MI - Landfill/disposal
Process equipment clean out	Boiler rinseate water - dilute (more than 99% water)	K022 D007	10,500 P	NA - tanker	NA	NA	Vickery Environmental; Vickery OH- Deepwell injection Onyx; West Carrollton OH - Fuel blending
Product/By-Product Processing	Spent acetone filters	D001 U002	102	55-gal. drums	NA	BD-908 <90Day Accumulation Area	Onyx; West Carrollton OH - Fuel blending
Product/By-Product Processing	Filters, solid absorbents & resins (CHP, AMS, 432-L, 6361, etc.)	D001	384 P	55-gal. drums	NA	Unit SAA's BD-908 <90Day Accumulation Area	Pollution Control Industries East Chicago IN - Fuel blending Onyx; West Carrollton OH - Fuel blending

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 Month**	**Type of Accumulation/ Storage**	**Type of On-Site Treatment**	**Waste Location**	**Name, state, and type of activity**
Process tank clean outs, clean up of process trenches, sumps	Organic solids, pit sludges	D018 U002 U012 U055 U188 U220	1194 P	55-gal. drums	NA	BD-908 <90Day Accumulation Area	Onyx; West Carrollton OH - Fuel blending
Process tank clean outs	Tank sludges	D001	20,443 P	55-gal. drums	NA	BD-908 <90Day Accumulation Area	Onyx; West Carrollton OH - Fuel blending Onyx; Sauget IL – Incineration
Laboratory	Bisphenyl-acetone (BPA) lab waste	D001 D002 D018 F001 U002 U188	967 P	55-gal. drums	NA	Lab SAA BD-908 <90Day Accumulation Area	Onyx; West Carrollton OH - Fuel blending Pollution Control Industries; East Chicago IN - Fuel blending
Laboratory	Spent GC sample vials (CHP)	D001	23 P	55-gal. SAA drum in lab	NA	Lab SAA BD-908 <90Day Accumulation Area	Onyx; West Carrollton OH - Fuel blending Pollution Control Industries; East Chicago IN - Fuel blending
Laboratory	Spent GC sample vials (phenol)	U188	80 P	55-gal. SAA drum in lab	NA	Lab SAA BD-908 <90Day Accumulation Area	Onyx; West Carrollton OH - Fuel blending Pollution Control Industries; East Chicago IN - Fuel blending

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 Month**	**Type of Accumulation/ Storage**	**Type of On-Site Treatment**	**Waste Location**	**Name, state, and type of activity**
Laboratory	Spent COD sample vials	D002 D007 D009 D011	69 P	55-gal. SAA drum in lab	NA	Lab SAA BD-908 <90Day Accumulation Area	Onyx; West Carrollton OH - Fuel blending Pollution Control Industries; East Chicago IN - Fuel blending
Laboratory	LC wastes	D001	83 P	55-gal. SAA drum in lab	NA	Lab SAA BD-908 <90Day Accumulation Area	Onyx; West Carrollton OH - Fuel blending Pollution Control Industries; East Chicago IN - Fuel blending
Laboratory	Miscellaneous used or unused chemicals	D001 D002 U210 U070 U220	165 P	55-gal. drums, lab pack	NA	BD-908 <90Day Accumulation Area	Vonroll America; East Liverpool OH-Thermal destruction Onyx; Sauget IL - Incineration Onyx; West Carrollton OH - Fuel blending
BPA Unit operations	BPA contaminated trash	U002 U188	860 P	55-gal. drums	NA	BPA Unit SAA's BD-908 <90Day Accumulation Area	Pollution Control Industries East Chicago IN - Fuel blending Onyx; West Carrollton OH - Fuel blending
Phenol Unit and Utilities operations	Heavy ends and phenol contaminated trash	K022 D018	4400 P	55-gal. drums	NA	Phenol Unit and Utilities SAA's BD-908 <90Day Accumulation	Onyx; West Carrollton OH - Fuel blending Pollution Control Industries; East Chicago IN - Fuel blending

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 Month**	**Type of Accumulation/ Storage**	**Type of On-Site Treatment**	**Waste Location**	**Name, state, and type of activity**
Clean up of spill residues	Soil contaminated with cumene	U055	134 P	<90 Day roll off box	NA	Near BD-908 <90Day Accumulation Area	Onyx; West Carrollton OH - Fuel blending Onyx; Port Arthur TX – Incineration
Clean up of spill residues	Absorbent booms contaminated with cumene	U055 D018	471 P	<90 Day roll off box	NA	Near BD-908 <90Day Accumulation Area	Onyx; West Carrollton OH - Fuel blending
Clean up of spill residues	Product phenol clean up	U188	101 P	55-gal. drums	NA	BD-908 <90Day Accumulation Area	Onyx; West Carrollton OH - Fuel blending Onyx; Port Arthur TX – Incineration
Clean up of spill residues	Leak detection , floor sweepings	D001 D018 D035	865 P	55-gal. drums	NA	BD-908 <90Day Accumulation Area	Onyx; West Carrollton OH - Fuel blending Onyx; Sauget IL – Incineration
Clean up of spill residues	Phenol contaminated dirt	U188	11,899 P	<90 Day roll off box	NA	Near BD-908 <90Day Accumulation Area	Michigan Disposal; Belleville MI - Landfill/disposal Onyx; West Carrollton OH - Fuel blending

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 Month**	**Type of Accumulation/ Storage**	**Type of On-Site Treatment**	**Waste Location**	**Name, state, and type of activity**
Maintenance - painting	Unused paint in cans, spent paint-related wastes	D001 D035	122 P	55-gal. drums	NA	Near BD-908 <90Day Accumulation Area	Onyx-West Carrollton OH – Fuel blending American Environmental Svc.; Morgantown WV
Maintenance - equipment & lighting changes	Mercury waste items (lamps, switches, CRTs, etc.)	Univ. waste or D009	39 P	Boxes or 55-G drums	NA	BD-908 <90Day Accumulation Area	Onyx-West Carrollton OH - Recycled
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	Onyx-West Carrollton OH - Recycled
Product/By-Product Processing	Spent BPA filters	NA Non-hazardous	Varies Not generated monthly	55-G drums	NA	BD-908 <90Day Accumulation Area	Green Valley Landfill Disposed as solid waste
Maintenance - equipment oil changes	Used oil	NA	~ 1635 P Not generated monthly	55-G. drums or totes	NA	Several locations throughout plant	Onyx-West Carrollton OH - Recycled

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 Month**	**Type of Accumulation/ Storage**	**Type of On-Site Treatment**	**Waste Location**	**Name, state, and type of activity**
BIF Trial Burn – left over chemicals	Tetrachloroethylene,	U210	922 P	55-G drums	NA	BD-908 <90Day Accumulation Area	Onyx-West Carrollton OH – Fuel blending
BIF Trial Burn – left over chemicals	o-Dichlorobenzene	U070	461 P	55-G drums	NA	BD-908 <90Day Accumulation Area	Onyx-West Carrollton OH – Fuel blending
Product/By-Product Processing	Spent alumina		4400 P/Yr Not generated monthly			BD-908 <90Day Accumulation Area	EnviroTank Clean , Belpre OH
On-site Medical/Emergency Care	Sharps Biomedical waste	NA Inf. Waste	Varies			BD-908 <90Day Accumulation Area	Stericycle, Parkersburg WV

Note:
Quantities of wastes generated that appear on this Summary Table were acquired from Sunoco's 2006 Annual Hazardous Waste Report and from 2006-2007 manifests reviewed at the facility during the inspection.

PROCESS INFORMATION

General:
Sunoco Chemicals-Haverhill (Sunoco) is an organic chemical manufacturer (NAICS 325192) that produces industrial organic chemicals. 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. 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. 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. 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, light hydrocarbon impurities (D001/D018/D035) and heavy residual hydrocarbon wastes (K022) are continuously purged from the process to the waste fuel storage (permitted) tanks. This material is 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 (see attached map). 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

SAA # and Wastes Accumulated		SAA Location
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 June 13-14, 2006 for compliance with Ohio's hazardous waste laws and the terms and conditions of their Ohio Part B Hazardous Waste Permit. No violations of Ohio's hazardous waste laws were found during the inspection.