



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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

November 1, 2007

**SCIOTO COUNTY
GENERAL FILE
(SPECTRA ENERGY WHEELERBURG
COMPRESSOR STATION)
DHWM/SEDO
OHD051368033**

Mr. John McCaughey, Area Supervisor
Spectra Energy Wheelersburg Compressor Station
3096 State Route 522
Wheelersburg, Ohio 45694

Dear Mr. McCaughey:

On October 23, 2007, I inspected the Spectra Energy Wheelersburg Compressor Station ("SEWCS") in Wheelersburg, Ohio to determine SEWCS' compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). SEWCS was represented by Mr. Matt Jarrell, Utility Pipeliner, and you.

I found the following violations of Ohio's hazardous waste laws. In order to correct these violations, you must do the following and send the required information **within 30 days** of the date of this letter:

- (1) **OAC Rule 3745-52-34(D)(4): Accumulation Time of Hazardous Waste:** A small quantity generator of hazardous waste may accumulate waste on-site for less than 180 days without a permit so long as certain conditions are met, including the labeling of each container of hazardous waste with the words "hazardous waste".

SEWCS failed to label two drums of hazardous waste D001/D005/D007/D008/D009/D018 which were located in the drum storage area with the words "hazardous waste". SEWCS submitted a manifest for these drums on October 24, 2007, therefore, you have now abated this violation.

- (2) **OAC Rule 3745-270-07(A)(1), Testing, Tracking and Recordkeeping Requirements for Generators, Treaters, and Disposal Facilities:** A generator of hazardous waste must determine if the waste has to be treated before it can be land disposed.

On the LDR form for manifest # 00209844GBF, SEWCS failed to determine if the D018 component of pipeline liquid (D001/D005/D007/D008/D018) required treatment.

In order to abate this violation, SEWCS must submit a revised LDR form to this office which is properly completed, and must take steps to review their process and personnel training to ensure that all LDR forms are properly completed with required information. Note that it is the generator's responsibility to ensure that all disposal paperwork, regardless of whether it is completed ahead of time by the disposal facility, prior to signing it.

GENERAL COMMENTS

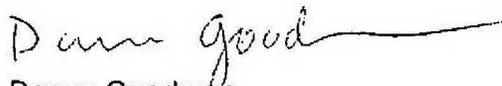
- (a) SWECS submitted a copy of their aerosol can management procedure which was reviewed by Ohio EPA. I recommend that SWECS review the most recent information on aerosol can management to ensure that your policy is following the most recently recommended procedures for ensuring that cans are empty of both propellant and contents, as well as evaluating the empty can itself prior to disposal as a solid waste. The Winter 2006 Notifier provided in the link below contains a comprehensive article on aerosol can management, as well as links to additional information referenced in the article:

<http://www.epa.state.oh.us/dhwm/pdf/NotifierWinter05.pdf>

- (b) SWECS may wish to consider the recycling of pipeline liquids for energy recovery, should the liquids be considered suitable. Please see the attached April 15, 1994 letter from USEPA regarding recycling of natural gas condensate liquids.

Enclosed, you will find a copy of the checklists that were completed during the inspection. Should you have any questions, please feel free to call me at (740) 380-5293. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>.

Sincerely,



Donna Goodman
District Representative
Division of Hazardous Waste Management

DG/mim

Enclosure

NOTICE:

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

Ohio Environmental Protection Agency
**RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to
tammy.mcconnell@epa.state.oh.us or mail it to Tammy
McCConnell, Central Office

2. Site EPA ID No.	EPA ID Number: OHD051368033								
3. Site Name	Name: Spectra Energy Wheelersburg Compressor Station					Website: (Optional)			
4. Site Location Information	Street Address: 3096 State Route 522								
	City, Town, or Village: Wheelersburg					State: OH			
	County Name: Scioto					Zip Code: 45694			
5. Site Land Type (check only one)	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	
6. NAICS code(s) www.census.gov/epcd/www/naics.html	486210								
7. Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: John			MI:	Last Name: McCaughey				
	Phone Number: 740-574-2058				Phone Number Extension:				
	E-Mail Address:								
	Fax Number:				Fax Number Extension:				
	Street or P.O. Box:								
	City, Town or Village:			State:		Country:		Zip Code:	
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Spectra Energy				Date Became Owner (mm/dd/yyyy):				
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: 5400 Westheimer Road								
	City, Town or Village: Houston				Owner Phone #:				
	State: TX				Country: USA		Zip Code: 74097		
	Name of Site's Operator: Texas Eastern Gas Transmission Wheelersburg Compressor Station				Date Became Operator (mm/dd/yyyy):				
	Owner Type:	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: 3096 State Route 522								
	City, Town or Village: Wheelersburg				Operator Phone #:				
	State: OH				Country: Scioto		Zip Code: 45694		
9. Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No								
10A. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)									
<input type="checkbox"/> Not Regulated				<input type="checkbox"/> Conditionally Exempt Small Quantity Generator					
<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste					
<input type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator					
<input checked="" type="checkbox"/> Small Quantity Generator (SQG)									
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace					
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste				<input type="checkbox"/> Small Quantity On-Site Burner Exemption					
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption					
<input type="checkbox"/> Underground Injection Control Facility									

10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply))					
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste			<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)		
<input type="checkbox"/> Destination Facility for Universal Waste					
Check all boxes below that apply for each of the three types of facilities above			10C. Used Oil Activities (Indicate Type(s) of Activity(ies))		
	Managed	<input checked="" type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner		
Batteries	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil		
Pesticides	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner		
Mercury containing equipment	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor			
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner			
11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.					
D001	D005	D007	D008	D009	D018
12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.					
Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:		
Tanks	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Other Comments: Matt Jarrell, Utility Pipeliner		
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No			
13. Name of Inspector(s)		Name of Inspector(s)		Date of Inspection/Time (mm/dd/yyyy) (hh:mm)	
Donna Goodman				10/23/2007	
14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.					
Signature of Owner, Operator, or an Authorized Representative		Name and Title (Print)		Date (mm/dd/yyyy)	

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Spectra Energy Wheelersburg Compressor Station	Facility Type SGQ	Date of Inspection: 10/24/07	EPA ID #: OHD051368033
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Waste Generated			On- or Off-Site Management		P2 Activities	
Process/Activity Generating Waste <small>(e.g. plating bath, machining, baghouse, painting, general maintenance, etc)</small>	Waste Description <small>(e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.</small>	QTY Generated per Month, Type of Accumulation <small>(container, tank, etc) and location of waste accumulation area</small>	Type of On-Site Treatment <small>(recycle, wwt, etc)</small>	Name, state, and type of activity occurring at the off-site facility.	Current P2 Activities	P2 Opportunities
1	Pipeline maintenance in which liquid filtered from compression of natural gas is collected	Pipeline Fluid D001/D005/ D007/D008/ D009/D018 Contains <50 ppm PCBs	100 gallons per month piped directly into a 2360 gallon tank. Misc. quantities of same waste stream are generated from other tools used in the plant for maintenance. These are drummed and placed in the drum storage area.	Veolia ES Technical Solutions Incineration Port Arthur, TX		
2	Misc. Maintenance of facility	Coatings, PPE, soil, debris, sandblasting media Non Haz	Varies. A rolloff of oily contaminated soil was onsite during inspection. Non haz	CWM Emele La Porte, TX		

3	Pipeline Maintenance	Pigs (device which squeegees pipes and pushes liquid out. Repaired and re-used	NA				
4	Equipment Maintenance	Used Oil	None onsite during inspection. Approx 2 drums per year.		Safety Kleen Recycled		
5	Lighting	Spent Lamps Universal Waste	None onsite during inspection.		Onyx Recycled		
6	General Maintenance	Spent Aerosol cans					
7	Maintenance of pigs	Waste Petroleum Distillates D001			CWM Emele La Porte, TX		
8							
9							

REMARKS-GENERAL INFORMATION

General Process Information:

Spectra Energy Wheelersburg Compressor Station is one of numerous compressor stations located along the Spectra Energy Pipeline which runs from the Gulf of Mexico (offshore Texas) to Toronto, Canada. It provides natural gas for the eastern half of the US. It consists of two, and in some locations, three pipelines. Compressor stations are needed along the length of the pipe in order to boost compression which decreases as the gas travels through the pipeline. The Wheelersburg Compressor Station has seven compressors. Gas is removed from the pipeline, compressed using centrifugal compressors, and returned to the pipe. Waste is generated when the pipeline is maintained. Liquids or "pipeline fluids" are strained from the gas twice per week during maintenance activities and sent directly into an onsite tank for accumulation. A small amount of PCBs are present in the waste, but less than 49 ppm. Other maintenance wastes include liquids from the use of pigs for pipeline maintenance, non hazardous solids such as coatings, soil and debris from spills, and sandblasting media. Several drums of used oil (non PCB) are generated per year from lubrication of equipment and maintenance of lawn mowing equipment, but none was accumulating onsite at the time of the inspection. Spent lamps are generated occasionally but none were accumulating onsite at the time of the inspection.

Regulatory/Enforcement History (if applicable):

No regulatory enforcement history at this site.

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes*_____ No_____

*If yes, refer promptly to your district P2 coordinator. Office of Compliance Assistance and Pollution Prevention – 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other:

**SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤ 100 Kg. (approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month
 LQG: ≥ 1,000 Kg. (-300 gallons) of waste in a calendar month or ≥ 1 Kg. of acutely hazardous waste in a calendar month
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds
 Safety Equipment Used:

GENERAL REQUIREMENTS

- | | | | | | | |
|--|-----|-------------------------------------|----|-------------------------------------|-----|--------------------------|
| 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 2. Has the generator obtained a U.S. EPA I.D. number? [3745-52-12] | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |
| 3. Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02 (F)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 4. Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of hazardous waste? [ORC 3734.02 (E) & (F)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
| 5. Does the generator accumulate hazardous waste? | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input type="checkbox"/> |

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

- | | | | | | | |
|---|-----|--------------------------|----|-------------------------------------|-----|--------------------------|
| 6. Has the generator accumulated hazardous wastes in excess of (180/270) days without a permit or an extension from the Director? [3745-52-34; ORC §3734-02(E)&(F)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
|---|-----|--------------------------|----|-------------------------------------|-----|--------------------------|

NOTE: SQG's shipping waste to a facility greater than 200 miles away can accumulate on-site for 270 days. [3745-52-34 (E)]

- | | | | | | | |
|--|-----|--------------------------|----|-------------------------------------|-----|--------------------------|
| 7. Is the generator accumulating more than 6,000 kg on site? [3745-52-34(D)] | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | <input type="checkbox"/> |
|--|-----|--------------------------|----|-------------------------------------|-----|--------------------------|

NOTE: 6,000 kg = approximately 27, 55-gallon drums. If the facility is accumulating waste for greater than 180/270 days without an extension/permit or is accumulating greater than 6,000 kg on-site, it is classified as a storage facility and TSD standards apply. Complete applicable TSD checklists.

- | | | | | | | |
|---|-----|--------------------------|----|--------------------------|-----|-------------------------------------|
| 8. Does the generator treat hazardous waste in a: | | | | | | |
| a. Container that meets 3745-66-70 to 3745-66-77? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| c. Drip pads that meet 3745-69-40 to 3745-69-45? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |
| d. Containment building that meets 3745-256-100 to 3745-256-102? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input checked="" type="checkbox"/> |

NOTE: Complete appropriate checklist for each unit.

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

MANIFEST REQUIREMENTS

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

- b. Is the transport vehicle owned operated by the reclaimer? Yes No N/A
- c. Is a copy of the reclamation agreement kept on-site for at least three years after termination/expiration of the agreement? Yes No N/A

NOTE: If wastes are reclaimed under a contractual agreement and an answer to questions 10(a) through 10(c) is no, the generator is in violation of 3745-52-20 (A) (B) & (D), 3745-52-22 and 3745-52-23. Even if the waste is being reclaimed under agreement, LDRs still apply. Complete LDR checklist.

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

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be complete. [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 N/A

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

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

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

NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have made a good faith effort to minimize their waste generation.

15. If the generator did not receive a return copy of each completed manifest within 60 days of being accepted by the transporter did the generator submit to Ohio EPA, a copy of the manifest with some indication that the generator has not received confirmation of delivery? 3745-52-42(B)] Yes No N/A

16. Are signed copies of all manifests being retained for at least three years? [3745-52-40] Yes No N/A

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

PREPAREDNESS AND PREVENTION

17. Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-34(D)(5)(a)] Yes No N/A

18. Has the following been posted by the telephone: [3745-52-34(D)(5)(b)]

- a. Name and telephone number of emergency coordinator? Yes No N/A
- b. Location of fire and spill control equipment, and, if present, fire alarm(s) Yes No N/A
- c. Telephone number of local fire department? Yes No N/A

19. Are employees familiar with waste handling and emergency procedures [3745-52-34(D)(5)(c)] Yes No N/A

20. Has the facility properly responded to all fires and spills? [3745-52-34(D)(5)(d)] Yes No N/A

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

[Facility Name/Inspection Date]

[ID number]

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22. Does the generator have the following equipment at the facility if it is required due to actual hazards associated with the waste:
- a. Internal Alarm system? [3745-65-32(A)] Yes No N/A
- b. Emergency communication device? [3745-65-32(B)] Yes No N/A
- c. Portable fire control, spill control and decon equipment? [3745-65-32(C)]? Yes No N/A
- d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes No N/A
23. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes No N/A
- a. Are inspections recorded in a log or summary? [3745-65-33]? Yes No N/A
24. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under OAC 3745-65-32)? [3745-65-34(A)] Yes No N/A
25. If there is only one employee on the premises is there immediate access to a device (ex. phone, hand-held two-way radio) capable of summoning external emergency assistance? (Unless not required under 3745-65-32?) [3745-65-34(B)] Yes No N/A
26. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A
27. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes No N/A
28. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes No N/A

SATELLITE ACCUMULATION AREA REQUIREMENTS

29. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes No N/A
- b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes No N/A
- c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No N/A
- d. Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] Yes No N/A
- e. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]. Yes No N/A
- f. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A
30. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:
- a. Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes No N/A
- b. Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes No N/A

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

USE AND MANAGEMENT OF CONTAINERS

31. Has the generator marked containers with the words "Hazardous Waste" [3745-52-34(D)(4)] Yes No N/A
32. Is the accumulation date on each container? [3745-52-34(D)(4)]. **Two drums of pipeline liquids (D001 etc.) hazardous waste were unlabeled.** Yes No N/A
33. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A
- b. In good condition? [3745-66-71] Yes No N/A
- c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A

NOTE: Record location on process summary sheets and photograph the area.

34. Is the container accumulation area(s) inspected at least weekly? [3745-66-74] Per ORC§1.44(A) "Week" means seven(7) consecutive days. Yes No N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
35. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes No N/A
36. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B) 3745-66-77(A)] Yes No N/A
37. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B) ? [3745-66-77(B)] Yes No N/A

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

PRE-TRANSPORT REQUIREMENTS

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

[Facility Name/Inspection Date]

[ID number]

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SQG TANK SYSTEM REQUIREMENTS [3745-66-101]

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

TANK SYSTEM OPERATING REQUIREMENTS

2. Is the SQG complying with the following operating requirements of OAC 3745-66-101(B):
- a. Is the storage and/or treatment of ignitable, reactive or incompatible waste done in accordance with precautionary measures of 3745-65-17(B)? [3745-66-101(B)(1)] Yes No N/A
 - b. Does the SQG ensure that wastes or treatment reagents are not placed in a tank if they could cause the tank or its inner liner to rupture, leak, corrode or fail? [3745-66-101(B)(2)] Yes No N/A
 - c. Are uncovered tanks operated with 2 feet of freeboard or is the tank equipped with a containment structure, drainage control system, or diversion structure with a capacity that equals or exceeds the volume of the top 2 feet of the tank? [3745-66-101(B)(3)] Yes No N/A
 - d. **If waste is continuously added to the tank:** Is the tank equipped with a waste feed cut-off or bypass system? [3745-66-101(B)(4)] Yes No N/A

TANK SYSTEM INSPECTION

3. Does the generator inspect the following:
- a. Discharge control equipment (daily)? [3745-66-101(C)(1)] Yes No N/A
 - b. Data from monitoring equipment (daily)? [3745-66-101(C)(2)] Yes No N/A
 - c. The level of the waste in the tank (daily)? [3745-66-101(C)(3)] Yes No N/A
 - d. The tank construction material (weekly)? [3745-66-101(C)(4)] Yes No N/A
 - e. The area surrounding the tank (weekly)? [3745-66-101(C)(5)] Yes No N/A

NOTE: Per ORC§1.44(A) "Week" means 7 consecutive days.

TANK SYSTEM CLOSURE REQUIREMENTS

4. Upon closure of the tank did the SQG remove all hazardous waste from the tank system in compliance with OAC 3745-66-101(D)? Yes No N/A

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES

5. For tanks used to store ignitable or reactive wastes, has the owner/operator complied with **one of the following**: [3745-66-101(E)(1)] Yes No N/A
- a. The waste is treated, rendered, or mixed before or immediately after placement in a tank so that the resultant waste, mixture or dissolution of material no longer meets the definition of ignitable or reactive waste; and 3745-65-17 is complied with? or Yes No N/A
 - b. Is the waste stored or treated to protect it from any materials or conditions that may cause the waste to ignite or react?; or Yes No N/A
 - c. Is the tank used solely for emergencies? Yes No N/A
6. If ignitable or reactive waste are treated or stored in covered tanks, does the owner/operator comply with the buffer zone requirements for tanks contained in tables 2-1 to 2-6 of the NFPA Flammable and Combustible Liquid Code (1977 or 1981)? [3745-66-101(E)(2)] Yes No N/A
7. Have incompatible wastes, or incompatible wastes and materials been placed into the same tank? Yes No N/A
- If so**, have the requirements of 3745-65-17(B) been met?[3745-66-101(F)(1)] Yes No N/A

8. Have hazardous wastes been placed in an unwashed tank which previously held an incompatible waste or material? [3745-66-101(F)(2)]

Yes No N/A

If so, have the requirements of 3745-65-17(B) been met?[3745-66-101(F)(2)]

Yes No N/A

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) see 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)] **Company failed to make this determination for D018 of pipeline liquid.** 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] Yes No NA
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] Yes No NA
12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? Yes No NA
- If so:
- 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 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

REMARKS