

REMARKS

- #14) Hazardous constituents in ground water exceed concentration limits in the uppermost aquifer. Cytec is addressing ground water corrective action measures concurrent with the CMS.
- #15) Past monitoring results have revealed the presence of additional constituents. In these cases, Cytec followed the provisions of condition G.9. of the Part B permit, and the regulations in OAC 3745-54-98 and 3745-54-99. Cytec submitted a class 1A permit modification to incorporate the new constituents into the ground water monitoring program.
- #16) Cytec submitted, and Ohio EPA approved, a CMS Workplan for the facility that incorporates ground water corrective action measures. The CMS Report has been submitted to and approved by Ohio EPA.

36. Has the Permittee submitted a corrective action program that contains all appropriate measures to ensure that ground water quality will achieve compliance in a reasonable time period? [Condition G.9.d.ii] Yes No N/A __RMK#16

NOTE: Until such time that the CMS and a Corrective Action program is implemented in accordance with Permit Conditions E.8 and E.9, the Permittee shall follow an Integrated Ground Water Monitoring Program in accordance with the conditions of this permit module.

37. Has the Permittee continued the corrective action measures during the compliance period to the extent necessary to ensure that the GWPS is not exceeded? [Condition G.9.d.iii] Yes No N/A __RMK#

NOTE: If the Permittee is conducting corrective action at the end of the compliance period, the Permittee must continue corrective action for as long as necessary to achieve compliance with the GWPS.

The Permittee may discontinue corrective action activities during the compliance period when the GWPS has not been exceeded at any well listed in Permit Condition G.3(b) for any constituent listed in Permit Condition G.2(a) for three consecutive years (i.e. 6 consecutive semi-annual sampling events). The Permittee must continue a compliance monitoring program under OAC Rule 3745-54-99 for the remainder of the compliance period.

38. Has the Permittee reported in writing to the director on the effectiveness of the corrective action monitoring program on a semiannual basis according to Permit Condition G.8? [Condition G.9.e.] Yes No N/A __RMK#

39. If the Permittee has determined that the corrective action monitoring program established by this permit no longer satisfies the requirements of OAC Rule 3745-55-011, has the Permittee submitted an application for a permit modification per OAC Rule 3745-50-51 to make any appropriate changes to the program within 90 days of that determination? Yes No N/A __RMK#

34. Has the Permittee determined the ground water flow rate and direction in the uppermost aquifer at least annually? [Condition G.9.c.viii] Yes No N/A __RMK#

RESPONSE ACTION

35. Has the Permittee implemented a corrective action program, to remove or treat in place any hazardous constituents specified in Permit Condition G.2(a) that exceed their respective concentration limits specified in Permit Condition G.2(a) in the ground water? [Condition G.9.d.a] Yes No N/A __RMK#14

NOTE: The corrective action program shall be detailed in a Corrective Measures Study (CMS), as required by Permit Condition E.8, with the implementation schedule included in the CMS workplan.

29. Has the Permittee analyzed samples from all monitoring wells for all constituents contained in Appendix to OAC Rule 3745-54-98 (Table 4 in Appendix E-7 of the Permit Application) once every two years to determine whether additional hazardous constituents are present in the uppermost aquifer? [Condition G.9.c.v] Yes No N/A __RMK#
30. Has the Permittee found additional constituents present in the monitoring wells? If so, Yes No N/A __RMK#
- a. Has the Permittee re-sampled the affected well(s) within 1 month for the additional detected constituents? Yes No N/A __RMK# 15
31. Did the results of the second analysis confirm the presence of new hazardous constituents? If so, Yes No N/A __RMK# 15
- a. Did the Permittee report their concentrations to the director in writing within 7 days from completion of the second analysis? Yes No N/A __RMK# 15
- b. If the Permittee chooses not to re-sample, did the Permittee report the concentrations of the additional constituents to Ohio EPA within 7 days after completion of the initial analysis? Yes No N/A __RMK#
32. Within 30 days of notifying the director, has the Permittee submitted to Ohio EPA an application for a permit modification to incorporate the additional constituents into the Permit? [Condition G.9.c.vi] Yes No N/A __RMK# 15
- NOTE:** The application must include; an identification of the concentration of each new constituent detected at the compliance point and/or any new well downgradient between the compliance point and the downgradient property boundary; a proposed concentration limit for each new constituent; or, a notice of intent to seek an alternate concentration limit for a hazardous constituent.
33. Has the Permittee maintained a record of ground water analytical data as measured and in a form necessary for the determination of statistical significance for the compliance period? [Condition G.9.c.vii] Yes No N/A __RMK#

25. Does the Permittee's ground water monitoring system include the installation and maintenance of a ground water monitoring system at the compliance point, and, as necessary to protect human health and the environment, between the compliance point and the downgradient property boundary and beyond the property boundary? [Condition G.9.c.i] Yes No N/A __RMK#
26. Does the Permittee's ground water monitoring system include the collection, preservation, and analysis of samples pursuant to Permit Conditions G.4, G.5, and G.6? [Condition G.9.c.ii] Yes No N/A __RMK#
27. Has the Permittee conducted a sampling program semiannually for each chemical parameter and hazardous constituent specified in Permit Condition G.2(a) from each well (background and compliance) specified in Permit Condition G.3(b) during the permit period and any extensions due to corrective action implementation? [Condition G.9.c.iii] Yes No N/A __RMK#
28. Has the Permittee compared the concentration of each hazardous constituent measured at each well at the compliance point specified in Permit Condition G.2(b), between the compliance point and the downgradient facility property boundary, with its concentration limit each time ground water quality is determined in accordance with the procedures specified in Permit Condition G.7? [Condition G.9.c.iv] Yes No N/A __RMK#

NOTE: Wells beyond the property boundary shall be sampled where necessary to protect human health and the environment, unless the Permittee demonstrates to the Agency that, despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake such action. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where off-site access is denied. On-site measures to address such releases will be determined on a case-by-case basis.

required under OAC Rule 3745-54-15(D) related to ground water monitoring and equipment as required under OAC Rule 3745-54-73(B)(5);

- o. Evaluation of the efficiency of any corrective actions performed to bring the ground water quality into compliance with the GWPS per permit condition G.2 Yes No N/A __RMK#

23. Has the Permittee submitted Semi-Annual groundwater monitoring reports according to the following schedule:

- a. For the 1st Semi-Annual event, 45 days after analytical results are received from the laboratory? [Condition G.8.b.i] Yes No N/A __RMK#
- b. For the 2nd Semi-Annual event, 75 days after analytical results received from the laboratory, or by March 1st of the following calendar year, which ever comes first? [Condition G.8.b.i] Yes No N/A __RMK#

NOTE: Once a ground water corrective action program has been implemented, the Permittee must report, in writing, semi-annually to the director on the effectiveness of the corrective action program. These reports must be submitted at the same time as the analytical data in accordance with the schedule above for each year until the corrective action program has been completed.

24. Has the Permittee submitted an annual report to the director by March 1st of the following year? [Condition G.8.b.ii] Yes No N/A __RMK#

NOTE: The annual reports must include, at a minimum, the analytical results, ground water elevation data, and the results of any statistical analyses. In addition, a copy, on disk, of all ground water and blank data must be submitted electronically in the format supplied by the director, a hard copy of well-specific information for any new/replacement wells, and any other information specified in the instructions for the annual report not addressed in this Permit Condition must be submitted as required by OAC Rule 3745-54-75.

INTEGRATED GROUNDWATER MONITORING PROGRAM

NOTE: The Permittee is required to establish and implement a ground water monitoring corrective action program under OAC Rule 3745-55-011 and must take corrective action, as necessary, to ensure that units are in compliance with the GWPS as specified in permit condition G.2. For additional details on the corrective action program see permit condition G.9.

- b. Date each well was sampled; Yes No N/A __RMK#
- c. Date, time, and identification of all blanks and duplicates; Yes No N/A __RMK#
- d. Any field log documentation of deviation from the procedures in Appendix E-6 of the Permit Application, including documentation of parameter omissions during the sampling event; Yes No N/A __RMK#
- e. Date the Permittee received the results from the laboratory; Yes No N/A __RMK#
- f. Date the owner or operator completed their review of the analytical laboratory's verification of the accuracy and precision of the data and determined its quality; Yes No N/A __RMK#
- g. Results of the data validation review per Permit Condition G.8(a)(vi) including: report completeness, chain of custody, sample receipt form, signed statement of validity, technical holding time review, data qualifiers including their definitions, dilutions, blank data, spikes, spike recovery %, surrogate recovery, and an explanation of any rejected results consistent with U.S. EPA and Ohio EPA guidelines for data review; Yes No N/A __RMK#
- h. Results of all blanks and duplicates (trip, field, equipment, and method); Yes No N/A __RMK#
- i. Results of the field parameters; Yes No N/A __RMK#
- j. The statistical evaluation of the data according to the statistical tests specified in Permit Condition G.7; Yes No N/A __RMK#
- k. Any change in well status; Yes No N/A __RMK#
- l. Ground water surface elevations taken at the time of sampling each well; Yes No N/A __RMK#
- m. Date and results of the annual determination of the ground water flow rate and direction; Yes No N/A __RMK#
- n. Results of the last three years of all inspections Yes No N/A __RMK#

are available to the permittee using the methods outlined in the most recent version of SW-846. [Condition G.7.b.vi]

- g. If necessary, the statistical method includes procedures to control or correct for seasonal and spatial variability as well as temporal correlation in the data. [Condition g.7.b.vii]

Yes No N/A __RMK#

RECORDKEEPING and REPORTING

22. Has the Permittee entered all of the following information obtained in accordance with Permit Module G in the operating record? [Condition G.8.a]

- a. Laboratory results from each of the wells and their associated qualifiers including the laboratory sheets for the full volatile, semi-volatile and pesticide analyses (must include method codes, detection limits, and units of measurement);

Yes No N/A __RMK#

21. Does the Permittee's statistical procedures comply with the following performance standards?

a. The statistical evaluation of ground water monitoring data is conducted separately for each hazardous constituent specified in Permit Condition G.2.a in each well [Condition G.7.b.i]

Yes No N/A __RMK#

b. The statistical method is appropriate for the distribution of the data used to establish background or concentration limits. If the distribution of the constituents differ, more than one statistical method may be needed. [Condition G.7.b.ii]

Yes No N/A __RMK#

c. The statistical method provides a reasonable balance between the probability of falsely identifying a non-contaminating and/or exceeding unit/area and the probability of failing to identify a contaminating and/or exceeding unit area. [Condition G.7.b.iii]

Yes No N/A __RMK#

d. If a control chart approach is used, the specific type of control chart and its associated parameter values are presented by the Permittee and approved in the permit. [Condition G.7.b.iv]

Yes No N/A __RMK#

e. If a tolerance or prediction interval procedure is used, the levels of confidence and, for tolerance intervals, the percentage of the population that the interval must contain, is proposed by the Permittee and approved in the permit. These parameters must be determined after considering the number of samples in the background data base, the data distribution, and the range of concentration values for each constituent of concern. [Condition G.7.b.v]

Yes No N/A __RMK#

f. The statistical method accounts for data below the limit of detection with one or more statistical procedures that are protective of human health and the environment. Any practical quantitation limit (PQL) approved in the permit that is used in the statistical method must be the lowest concentration level that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions that

Yes No N/A __RMK#

SAMPLING FREQUENCY

NOTE: Data on each hazardous constituent specified in Permit Condition G.2.a will be collected from all wells listed in Permit Condition G.3.b. The sampling procedure and interval for each constituent is described in Section 3.3 and Table 3 of Appendix E-7 of the Permit Application.

17. Has the Permittee collected the number and kinds of samples to establish background appropriate for the form of statistical test employed, following generally accepted statistical procedures? [Condition G.6.a] Yes No N/A __RMK#
18. Has the Permittee collected samples as large as necessary to ensure with reasonable confidence that a contaminant release to ground water from a facility will be detected? [Condition G.6.b] Yes No N/A __RMK#

NOTE: Background values shall be established in the permit through the permit modification process in OAC Rule 3745-50-51. Background data may be updated as necessary in accordance with Appendix E-7 of the Permit Application to provide an accurate representation of background ground water quality.

STATISTICAL PROCEDURES

19. Has the Permittee conducted statistical procedures as presented in Section 4 of Appendix E-7 of the Permit Application utilizing a combination of time-trend graphs and the Mann-Kendall test, or another statistical method approved by the director? [Condition G.7.a] Yes No N/A __RMK#
20. Are the Permittee's statistical procedures protective of human health and the environment, provide reasonable confidence that the migration of hazardous constituents from a unit/area into and through the aquifer will be indicated, and will determine whether such leakage of hazardous constituents into the ground water exceeds specified concentration limits? [Condition G.7.b] Yes No N/A __RMK#

NOTE: The well casing must be screened and packed with gravel or sand, where necessary, to enable collection of ground water samples. The annular space above the sampling depth must be sealed to prevent contamination of samples and the ground water. Appendix E-1 of the Permit Application contains ground water monitoring well construction information.

12. Are wells removed or replaced in compliance with OAC Rule 3745-50-51, permit modification process? [Condition G.3.d] Yes No N/A __RMK#

NOTE: Each change must be accompanied by a revised map and table (Figure 1 and Table 3 of Appendix E-7 found in the Permit Application) as specified in Permit Condition G.3(b).

13. Has the Permittee within 90 days of replacement, demonstrated to Ohio EPA that the ground water quality at the replacement well meets the criteria in Permit Condition G.3.a? [Condition G.3.e] Yes No N/A __RMK#

SAMPLING AND ANALYSIS PROCEDURES

14. Has the Permittee implemented the IGWMP? [Condition G.4.a] Yes No N/A __RMK#

NOTE: The IGWMP must include consistent sampling and analysis procedures designed to ensure monitoring results that provide a reliable indication of ground water quality below the units. The sampling and analytical methods must be appropriate to accurately measure hazardous constituents in ground water samples.

15. Has the Permittee validated field and analytical data in accordance with procedures specified in Appendix E-7 of the Permit Application? [Condition G.4.c] Yes No N/A __RMK#

GROUND WATER SURFACE ELEVATION

16. Has the Permittee determined the ground water surface elevation at each well identified in the Table in Permit Condition G.3.b each time ground water is sampled using the methods in Section 3.1 of Appendix E-7 of the Permit Application? [Condition G.5] Yes No N/A __RMK# #

WELL LOCATION, INSTALLATION, MAINTENANCE, AND REMOVAL

5. Does the Permittee's ground water monitoring system consist of a sufficient number of wells, installed and screened at appropriate locations and depths, to yield ground water samples from the unconsolidated overburden, weathered bedrock, and competent bedrock zones which are the uppermost aquifer?
[Condition G.3.a] Yes No N/A __RMK#
6. Has the Permittee's ground water monitoring samples represented the quality of background water that has not been affected by leakage from the unit/area?
[Condition G.3.a.i] Yes No N/A __RMK#
7. Has the Permittee's ground water monitoring samples represented the quality of ground water passing the point of compliance, between the point of compliance and the downgradient property boundary, and beyond the property boundary? [Condition G.3.a.i] Yes No N/A __RMK#
8. Has the Permittee's ground water monitoring samples allowed for the detection and measurement of contamination for all potential release pathways to the uppermost aquifer from the waste management units based on site-specific hydrogeologic characterization when hazardous waste or hazardous constituents have migrated from the units to the uppermost aquifer?
[Condition G.3.a.ii] Yes No N/A __RMK#
9. Has the Permittee's ground water monitoring samples demonstrated the effectiveness of any corrective action program? [Condition G.3.a.iii] Yes No N/A __RMK#
10. Does the Permittee's monitoring system consist of the ground water wells as specified on Figure 1 and Table 3 of Appendix E-7 found in the Permit Application?
[Condition G.3.b] Yes No N/A __RMK#
11. Are monitoring wells cased in a manner that maintains the integrity of the bore hole and complies with the detailed plans and specifications presented in Table 2 of Appendix E-7 of the Permit Application?
[Condition G.3.c] Yes No N/A __RMK#

MODULE G - INTEGRATED GROUND WATER MONITORING

NOTE: Ground water contamination from the hazardous waste management units (HWMU's) regulated under OAC Rules 3745-54-90 through 3745-55-01 has co-mingled with ground water contamination from solid waste management units (SWMU's) regulated under OAC Rule 3745-55-011 at the site. It is not practical to separate the HWMU's and SWMU's either for ground water monitoring purposes or remedial efforts. A more efficient multifaceted approach is to combine the relevant portions of OAC Rule 3745-55-01 and 3745-55-011 for these areas. This combined approach is referred to as the Integrated Ground Water Monitoring Program or IGWMP.

GROUND WATER PROTECTION STANDARD

1. Has the Permittee ensured that the hazardous constituents detected in the ground water do not exceed the concentration limits in the uppermost aquifer underlying the waste management areas beyond the point of compliance during the compliance period and to respond with any corrective action measures to bring the ground water back into compliance with those limits? [Condition G.2] Yes No N/A __RMK#14

2. Has the Permittee also monitored ground water for the field parameters temperature, pH, Specific Conductance, and Turbidity? [Condition G.2.a] Yes No N/A __RMK#

POINT OF COMPLIANCE

3. Has the Permittee monitored background wells, primary compliance wells, and secondary compliance wells as listed in Table 3 of Appendix E-7 of the permit application? [Condition G.2.b] Yes No N/A __RMK#

4. Has the Permittee monitored the ground water between the point of compliance and the down-gradient property boundary to determine if the concentration limit has been exceeded at any point? [Condition G.2.b] Yes No N/A __RMK#

- ii. designation of the type of unit;
- iii. general dimensions and structural description;
- iv. when the unit was operated; and
- v. specification of all waste(s) that have been managed at the unit.

20. Within 30 days of discovery of any release of hazardous waste(s) or hazardous constituents from any new or existing WMU, did the Permittee submit all available information to Ohio EPA? [Condition E.10.b] Yes No N/A __RMK#

CORRECTIVE ACTION FOR NEWLY IDENTIFIED WMU'S AND RELEASES

NOTE: If Ohio EPA determines that a RFI is required for newly identified WMU's, the Permittee must submit a written RFI Workplan to Ohio EPA upon a time frame established in written notification by Ohio EPA in accordance with Permit Condition E.5. This determination will be made based on the information submitted in accordance with Permit Condition E.10.

Further investigations or corrective measures will be established by Ohio EPA in accordance with Permit Conditions E.5, E.8, and E.9.

The Permittee must make the RFI Workplan submittal, and any other related submittals, in accordance with time frames established by Ohio EPA.

21. Have the following documents been certified by a Professional Engineer, licensed to practice in the State of Ohio? [Condition E.12]
- i. Final Interim Measures Report Yes No N/A __RMK#
 - ii. Corrective Measures Final Design Yes No N/A __RMK#
 - iii. Corrective Measures Construction Completion Report Yes No N/A __RMK#
 - iv. Corrective Measures Attainment of Groundwater Performance Standards Report Yes No N/A __RMK#
 - v. Corrective Measures Completion of Work Report Yes No N/A __RMK#

CMS FINAL REPORT

14. Within 60 days after the completion of the CMS, has the Permittee submitted a CMS Final Report to Ohio EPA? [Condition E.8.c] Yes No N/A __RMK#
15. Within 45 days of receipt of Ohio EPA comments on the CMS Final Report, has the Permittee submitted either an amended or new CMS Final Report that incorporates Ohio EPA's comments? [Condition E.8.c.1] Yes No N/A __RMK#

NOTE: The CMS Final Report shall include a remediation schedule for each SWMU at the site, unless Permit Condition E.7 applies.

CORRECTIVE MEASURES IMPLEMENTATION (CMI)

16. Based on the results of the CMS, has the Permittee Implemented one or more of the Corrective Measures authorized by Ohio EPA? [Condition E.9] Yes No N/A __RMK#

NOTE: The Corrective Measure selected for implementation must: (1) be protective of human health and the environment; (2) attain media cleanup standards; (3) control the source(s) of releases so as to reduce or eliminate further releases of hazardous waste(s) (including hazardous constituents); and (4) comply with all applicable standards for management of wastes. If two or more of the Corrective Measures studies meet the threshold criteria set out above, Ohio EPA will authorize the Corrective Measures Implementation by considering remedy selection factors including: (1) long-term reliability and effectiveness; (2) the degree to which the Corrective Measure will reduce the toxicity, mobility or volume of contamination; (3) the Corrective Measure's short term effectiveness; (4) the Corrective Measure's Implementability; and (5) the relative cost associated with the alternative.

17. Has the Permittee implemented the Corrective Measure after Ohio EPA initiates a permit modification? [Condition E.9.a] Yes No N/A __RMK#
18. Within 30 days after receiving CMI approval, has the Permittee provided financial assurance in the amount necessary to implement the corrective measure(s)? [Condition E.9.b] Yes No N/A __RMK#
19. Within 30 days of discovery of a newly identified WMU, did the Permittee submit the following information to Ohio EPA? [Condition E.10.a]

- i. the location of the unit on the site topographic map;

7. Has the Permittee implemented the RFI Workplan according to the terms and schedule in the approved RFI Workplan? [Condition E.5.c] Yes No N/A __RMK#
8. Within 90 days of completing the RFI, has the Permittee submitted an RFI Final Report to Ohio EPA? [Condition E.5.d] Yes No N/A __RMK#

INTERIM MEASURES

9. Based on the results of the RFI Final Report or other information documenting a release of hazardous waste or constituents, has the Permittee undertaken an Interim Measure to mitigate or eliminate a threat to human health or the environment? [Condition E.6] Yes No N/A __RMK#

DETERMINATION OF NO FURTHER ACTION

10. Based on the results of the completed RFI and other relevant information, has the Permittee submitted an application to Ohio EPA for a permit modification to terminate Corrective Action tasks for certain WMU's? [Condition E.7.a] Yes No N/A __RMK#

NOTE: The above permit condition is not a requirement; rather is up to the Permittee to decide whether a permit modification will be submitted.

CORRECTIVE MEASURES STUDY (CMS)

CMS WORKPLAN

11. Has the Permittee submitted a written CMS Workplan to Ohio EPA within 120 days of the effective date of the permit? [Condition E.8.a] Yes No N/A __RMK#
12. Within 45 days of receipt of Ohio EPA comments on the CMS Workplan, has the Permittee submitted either an amended or new CMS Workplan that incorporates Ohio EPA's comments? [Condition E.8.a.1] Yes No N/A __RMK#
13. Has the Permittee implemented the CMS Workplan according to the terms and schedule in the approved CMS Workplan? [Condition E.8.b] Yes No N/A __RMK#

MODULE E - CORRECTIVE ACTION REQUIREMENTS

CORRECTIVE ACTION AT THE FACILITY

1. Has the Permittee instituted Corrective Action as necessary to protect human health and the environment for all releases from any waste management unit (WMU) at the Facility? [Condition E.1] Yes No N/A __RMK#
2. Has the Permittee implemented Corrective Action beyond the Facility property boundary, where necessary, to protect human health and the environment? [Condition E.2] Yes No N/A __RMK#

NOTE: If the Permittee is unable to obtain the necessary permission to undertake such actions, the Permittee must demonstrate to the satisfaction of Ohio EPA, that, despite the Permittee's best efforts, the Permittee was unable to obtain such permission. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the Facility boundary where off-site access is denied. On-site measures to address such releases will be addressed under the RFI, CMS, and CMI phases, as determined to be necessary.

RCRA FACILITY INVESTIGATION (RFI)

RFI REPORT

3. Has the Permittee submitted a sitewide RFI Report to Ohio EPA within 90 days of the effective date of the permit? [Condition E.5] Yes No N/A __RMK#
4. Within 45 days of receipt of Ohio EPA comments on the RFI Report, has the Permittee submitted either an amended or new RFI Report that incorporates Ohio EPA's comments? [Condition E.5.a.1] Yes No N/A __RMK#

RFI FOR NEWLY DISCOVERED UNITS

5. In case of newly discovered WMU's, has the Permittee submitted a written RFI Workplan to Ohio EPA within a time frame established by Ohio EPA? [Condition E.5.b] Yes No N/A __RMK#
6. Upon receipt of Ohio EPA comments on the RFI Workplan, has the Permittee submitted either an amended or new RFI Workplan that incorporates Ohio EPA's comments? [Condition E.5.b.1] Yes No N/A __RMK#

POST-CLOSURE REQUIREMENTS

4. **Following completion of the closure of the surface impoundment(s):** Has the Permittee implemented post-closure care of the unit(s) in accordance with OAC rule 3745-55-17 and the approved post-closure plan? [Condition B.35(a)] Yes No N/A __RMK# 12
5. Has the Permittee amended the post-closure plan? If so: Yes No N/A __RMK#
- a. Has the plan been amended in accordance with OAC rule 3745-55-18(D)? [Condition B.35(c)] Yes No N/A __RMK#

POST-CLOSURE NOTICES

6. Following the certification of closure, did the Permittee comply with the post-closure notice requirements as included in Condition B.35(d) of the permit? Yes No N/A __RMK# 13
7. Following the completion of post-closure, did the Permittee certify that such post-closure care was conducted in accordance with OAC rule 3745-55-20 and the approved post-closure plan? [Condition B.35(e)] Yes No N/A __RMK#

REMARKS

- #12) Cytec has implemented post-closure care for Pond 1 and Pond 2.
- #13) Cytec filed the post-closure deed notice for Pond 1 with the Washington County Recorder's Office. The declaration of use was recorded on August 28, 2006, at Volume 437, Pages 2333-2344 and cross references the survey plat recorded at Volume 15, Page 100.

e. Has the Permittee certified that the facility has been closed in accordance with the specifications in the approved closure plan as required by OAC rule 3745-55-15? [Condition B.33]

Yes No N/A __RMK# 10

f. Has the Permittee submitted a survey plat to the director and the local zoning authority no later than the certification of closure of each hazardous waste disposal unit? [Condition B.34]

Yes No N/A __RMK# 11

REMARKS

- #9) Cytec amended the Pond 1 closure plan to address the unit through landfill closure instead of a clean closure approach.
- #10) Cytec has closed Pond 1 and Pond 2. Both units are in post-closure care.
- #11) Cytec submitted a survey plat for Pond 1 and Pond 2 when the units were certified closed.

CLOSURE/POST-CLOSURE REQUIREMENTS

GENERAL CLOSURE REQUIREMENTS

1. Is the Permittee maintaining at the facility, the approved closure plan which contains the elements set forth in OAC rule 3745-55-12? [Condition B.29] ■Yes □No □N/A __RMK#

AMENDMENT OF CLOSURE PLAN

2. Has the Permittee amended the closure plan? If so: ■Yes □No □N/A __RMK# 9
- a. Has the plan been amended in accordance with OAC rule 3745-55-12(C)? [Condition B.28] ■Yes □No □N/A __RMK# 9

CLOSURE PROCEDURES

3. Has the Permittee closed the facility? If so: ■Yes □No □N/A __RMK# 10
- a. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26] ■Yes □No □N/A __RMK# 10
- b. Did the Permittee carry out the approved closure plan as set forth in the permit application and the conditions of the permit? [Condition B.27] ■Yes □No □N/A __RMK# 10
- c. Has the Permittee decontaminated and/or disposed of all facility equipment, structures and soils as required by OAC rule 3745-55-14 and the approved closure plan? [Condition B.32(a)] ■Yes □No □N/A __RMK# 10
- d. Did the Permittee notify Ohio EPA's Southeast District Office within five working days prior to all closure activities, including rinseate and soil sampling? [Condition B.32(b)] ■Yes □No □N/A __RMK# 10

c. Immediately after an emergency, did the emergency coordinator provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility? [Condition B.16.a]

Yes No N/A __RMK#

d. Did the Permittee collect and manage 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's hazardous waste rules? [Condition B.16.b]

Yes No N/A __RMK#

e. Within 15 days of the incident did the Permittee submit, to the Director, a written report of the incident? If so:

Yes No N/A __RMK#

i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23]

Yes No N/A __RMK#

f. 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 N/A __RMK#

10. In accordance with OAC Rule 3745-54-35, has the Permittee maintained aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency? [Condition B.12]

Yes No N/A __RMK#

REMARKS

AMENDMENT OF PLAN

8. Is the Permittee reviewing the approved contingency plan at least annually and upon the occurrence of any event listed in OAC Rule 3745-54-54 and amending the plan immediately if needed? [Condition B.17] Yes No N/A __RMK#

IMPLEMENTATION OF PLAN

9. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents at the facility since the date of the last inspection as described by Condition B.14 of the permit? If so: Yes No N/A __RMK#
- a. Did the Permittee immediately implement the approved contingency plan and follow the emergency procedures described in OAC rule 3745-54-56? [Condition B.14] Yes No N/A __RMK#
- b. In regard to spills and related toxic gas releases, does the plan describe the criteria to be used by the emergency coordinator to determine when the plan will be implemented? [Condition B.14] Yes No N/A __RMK#

NOTE: At a minimum, the plan must be implemented in the following situations:

- i. Any fire involving hazardous waste; or
- ii. Any explosion involving hazardous waste; or
- iii. Any hazardous waste release, outside of a secondary containment system, that causes or has the potential to cause off-site soil and/or surface water contamination; or
- iv. Any hazardous waste release that produces or has the potential to produce hazardous conditions, including noxious, poisonous, flammable and/or explosive gases, fumes, or vapors; harmful dust; or explosive conditions.

EMERGENCY AUTHORITIES

3. Has a state or local agency declined to enter into the arrangements set forth in OAC rule 3745-54-37(A)? If so: Yes No N/A __RMK#
- a. Has the Permittee documented the refusal in the operating record as required by OAC rule 3745-54-37(B)? Yes No N/A __RMK#
4. Has the Permittee maintained a copy of the contingency plan at the guard gate building during the duration of investigations and/or remediation activities conducted on-site? [Condition B.18(a)] Yes No N/A __RMK#
5. In the event of an emergency, has the Permittee provided a copy of the contingency plan and any relevant job-specific hazard assessments to emergency response agencies when they arrived on-site? [Condition B.18(b)] Yes No N/A __RMK#
- a. If an emergency event did occur, did the Permittee review the content of the Contingency Plan and hazard assessments with the emergency authorities at the site? [Condition B.18(b)] Yes No N/A __RMK#
6. Has the Permittee submitted a copy of the approved contingency plan and all revisions, amendments and modifications to Ohio EPA's Division of Emergency and Remedial Response in accordance with OAC rule 3745-54-53? [Condition B.18(c)] Yes No N/A __RMK#

EMERGENCY COORDINATOR

7. Is the Permittee in compliance with the requirements of OAC rule 3745-54-56 with regard to the emergency coordinator? [Condition B.19] Yes No N/A __RMK#

CONTINGENCY PLAN REQUIREMENTS

EMERGENCY PROCEDURES

1. In compliance with 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:
 - i. The layout of the facility? Yes No N/A __RMK#
 - ii. Properties of hazardous waste managed at the facility and associated hazards? Yes No N/A __RMK#
 - iii. Places where facility personnel will normally be working? Yes No N/A __RMK#
 - iv. Entrances to and roads inside the facility? Yes No N/A __RMK#
 - v. Evacuation routes as depicted in Section G.7 of the permit application? Yes No N/A __RMK#
 - b. Make arrangements with Ohio EPA emergency response teams, emergency response contractors, and equipment suppliers, as necessary? Yes No N/A __RMK#
 - c. Make arrangements to familiarize local hospitals 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 waste at the facility? Yes No N/A __RMK#
2. Is the Permittee in compliance with the requirements of OAC rule 3745-54-56 and Section G of the approved permit application regarding emergency procedures? [Condition B.20] Yes No N/A __RMK#

REQUIRED EQUIPMENT

- 1. Is the Permittee, at a minimum, maintaining the equipment set forth in the approved permit application (Section G) at the facility? [Condition B.9] ■ Yes No N/A __RMK#

- 2. Is the Permittee inspecting, testing and maintaining the equipment specified in Question No. 1 to assure its proper operation as specified in OAC rule 3745-54-33, the inspection plans and Section F.3 of the approved permit application? [Condition B.10] ■ Yes No N/A __RMK#

- 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 OAC rule 3745-54-34 and Section F of the approved permit application? [Condition B.11] ■ Yes No N/A __RMK#

REMARKS

PERSONNEL TRAINING

1. Is the facility conducting personnel training in accordance with Section H of the approved permit application and the following requirements of OAC rule 3745-54-16: [Condition B.6] ■Yes No N/A __RMK# 7
- a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC rule 3745-54-16(B)(C)] ■Yes No N/A __RMK# 7
- b. The facility provides personnel training to new employees within six months of their date of employment as required by OAC rule 3745-54-16(B)? Yes No ■N/A __RMK#8
- c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(B)? ■Yes No N/A __RMK# 7
2. Is the Permittee maintaining personnel training records as required by OAC rule 3745-54-16(D) and the approved permit application, including; written job titles, job descriptions and documented employee training records? [Condition B.6.] ■Yes No N/A __RMK#

REMARKS

- #7) One Cytec employee (Mr. Tony Marek) is responsible for the operation of the Marietta plant. Kemron was hired by Cytec to perform many of the operation and maintenance activities at the plant in Mr. Marek's absence. All Kemron employees receive 8 hour annual HAZWOPR training. Other contractors/subcontractors working for Cytec at the site are required to be current on their personnel training programs.
- #8) The plant is not currently operating, so there are no plans to hire new employees.

SECURITY PROVISIONS/FACILITY OPERATION

1. Is the Permittee complying with the security provisions of OAC rule 3745-54-14 and Section F of the approved permit application, including the following: [Condition B.4] Yes No N/A __RMK# 6
- 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 N/A __RMK#6
- b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility. Yes No N/A __RMK# 6
- c. A means to control entry, at all times, through gates or other entrances, to the active portion of the facility? Yes No N/A __RMK# 6
2. In accordance with OAC rule 3745-54-14(C) does the Permittee have signs reading "Danger - Unauthorized Personnel Keep Out" posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? Yes No N/A __RMK# 6
3. Is construction, maintenance and operation of the facility being conducted to minimize the possibility of a fire, explosion, or unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, ground or surface waters? [Condition B.1] Yes No N/A __RMK#

REMARKS

#6) On February 2, 2007, Ohio EPA approved a permit modification allowing Cytec to eliminate the 24 hour security guards at the site.

- c. Notation of observations made? Yes No N/A __RMK#
- d. Date/nature of any repairs or other remedial actions? Yes No N/A __RMK# 17
7. Has the Permittee received hazardous waste from a foreign source? [Condition B.2.a] Yes No N/A __RMK#
8. Has the Permittee received hazardous waste from off-site sources? [Condition B.2.b] Yes No N/A __RMK#
9. Has the Permittee complied with the requirements in OAC Rule 3745-55-48 regarding the incapacity of owners, operators, guarantors, or financial institutions? [Condition B.39] Yes No N/A __RMK#

REMARKS

#17. Cytec failed to conduct weekly inspections of the WWTP in accordance with Table F2 of their permit application. In general, inspection checklists failed to note the date and nature of corrective actions made.

MODULE B - GENERAL FACILITY CONDITIONS

1. Is the Permittee following the inspection procedures and schedules described in Section F-2 of the approved permit application and the requirements of OAC rule 3745-54-15? [Condition B.5] Yes No N/A __RMK# 17
2. Does the Permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or threat to human health? (OAC rule 3745-54-15(A)(1)(2)) Yes No N/A __RMK#17
3. Is the Permittee following the approved inspection schedule for inspecting: monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment as specified in OAC rule 3745-54-15(1)? Yes No N/A __RMK#17
- a. Is the schedule kept at the facility? [OAC rule 3745-54-15(B)(2)] Yes No N/A __RMK#
- b. Does the schedule identify the types of problems which are to be looked for during the inspection? [OAC rule 3745-54-15(B)(3)] Yes No N/A __RMK#
- c. Does the schedule include inspection of areas subject to spills daily when in use and according to other applicable regulations when not in use? [OAC rule 3745-54-15(B)(4)] Yes No N/A __RMK#
4. Does the Permittee remedy deterioration or any malfunctions discovered by an inspection as required by OAC rule 3745-54-15(C)? [Condition B.5] Yes No N/A __RMK#
5. Is the Permittee maintaining records of inspections for a minimum of three years? [Condition B.5] Yes No N/A __RMK#
6. In accordance with OAC rule 3745-54-15(D), do inspection records contain the following information:
- a. Date and time of inspection? Yes No N/A __RMK#
- b. The name of the inspector? Yes No N/A __RMK#

**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
McConnell, Central Office

| | | | | | | | | | | | | |
|--|--|---|--------------------------------------|--------------------------------------|--|---------------------------------------|---------------------------------------|--|-----------------------------------|--------------|--|-----------------|
| 2. Site EPA ID No. | EPA ID Number: OHD004325411 | | | | | | | | | | | |
| 3. Site Name | Name: Eramet Marietta Inc. | | | | | | Website: (Optional) | | | | | |
| 4. Site Location Information | Street Address: 16705 State Route 7 | | | | | | | | | | | |
| | City, Town, or Village: Marietta | | | | | | State: OH | | | | | |
| | County Name: Washington | | | | | | Zip Code: 45750 | | | | | |
| 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 | 331112 | | | | | | | | | | | |
| 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: Jeffrey | | | MI: M. | Last Name: McKinney | | | | | | | |
| | Phone Number: (740) 374-1143 | | | | Phone Number Extension: | | | | | | | |
| | E-Mail Address: jeff.mckinney@eramet-mn-us.com | | | | | | | | | | | |
| | Fax Number: (740) 374-1305 | | | | Fax Number Extension: | | | | | | | |
| | Street or P.O. Box: P.O. Box 299 | | | | | | | | | | | |
| | City, Town or Village: Marietta | | | | | | State: OH | | | Country: USA | | Zip Code: 45750 |
| | 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: Eramet Marietta Inc. | | | | | | Date Became Owner (mm/dd/yyyy): 7/1/99 | | | | |
| 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: P.O. Box 299 | | | | | | | | | | | | |
| City, Town or Village: Marietta | | | | | | Owner Phone #: (740) 374-1143 | | | | | | |
| State: OH | | | | | | Country: USA | | | Zip Code: 45750 | | | |
| Name of Site's Operator: | | | | | | Date Became Operator (mm/dd/yyyy): | | | | | | |
| Owner Type: | | Private <input 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: | | | | | | | | | | | | |
| City, Town or Village: | | | | | | Operator Phone #: | | | | | | |
| State: | | | | | | Country: | | | Zip Code: | | | |
| 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 checked="" type="checkbox"/> Large Quantity Generator (LQG) | | | | | <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator | | | | | | | |
| <input 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 checked="" 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 | D002 | D007 | D008 |
| | | | D035 |
| 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: Rod Dement, John Hughes, Dean Douglass, LeighAnn Buzzard |
| Tanks | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | Other Comments: |
| 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) |
| Scott Bergreen | | Jim Sferra (11/27/07 only) | 11/27/07 9:15-3:00 11/28/07 9:30-1:15 |
| 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: Eramet Marietta Inc. | Facility Type: LQG | Date of Inspection: 11/27/07 & 11/28/07 | EPAID#: OHD004325411 |
|---|---------------------------|---|-----------------------------|

| 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 Maintenance | Electrolytic Chrome Tank Digout (bricks), D007 | ~18,000 – 25,000 pounds/month, Waste is managed in roll-off box in < 90 day storage area | N/A | Michigan Disposal Belleville, MI | | |
| 2 Maintenance | EIChrome lead sludge, D008 | ~Tens of thousands of pounds/year, Waste is managed in roll-off box | N/A | Michigan Disposal Belleville, MI | | |
| 3 Maintenance | Waste paint related material, D001/D006 D007/D035 | < 50 pounds/month, Waste is managed in 55 gallon drum | N/A | Safety Kleen Smithfield, KY | Very little painting is performed at the plant | |
| 4 Lab Pack | Waste polyamines, D002 | 50 pounds (one time generation in 2005) | N/A | Safety Kleen Dolton, IL | Not a routine waste stream | |

| | | | | | | | |
|---|----------------|---|---|-----|---------------------------------------|--|--|
| 5 | Maintenance | Spent batteries, Not a haz. waste, batteries are recycled | Varies | N/A | Archer's Auto Parts Marietta, OH | | |
| 6 | Maintenance | Used Oil | Varies, Managed in a tank at Loco shop, and in 55 g. drums | N/A | Safety Kleen Poca, WV | | |
| 7 | Parts Cleaning | Parts washer solvent, Eramet uses non-haz. solvent | Varies, Parts washers located in Maintenance and Loco shop | N/A | Safety Kleen Poca, WV | | |
| 8 | Cleanup | Waste adhesives D001 | 50 pounds (one time generation in 2005) | N/A | Safety Kleen Smithfield, KY | | |
| 9 | Maintenance | Universal Waste fluorescent bulbs | Varies, Bulbs managed in boxes in Maintenance and EIMang building | N/A | Re-Light Recycling Parkersburg, WV | | |

REMARKS-GENERAL INFORMATION

General Process Information:

Eramet Marietta Inc. (FKA Elkem Metals) is a ferroalloy production facility located on State Route 7 south of Marietta. The plant is divided into Northside and Southside operations. The ElChrome Department, located on the northside of the plant, is an electrolytic plating operation that produces high grade chromium. High carbon ferrochrome feedstock is crushed and then dissolved in sulfuric acid and ammonia and placed in leach tanks lined with bricks. After some time, the tanks need to be refined which generates spent brick as a D007 hazardous waste. The contaminated bricks are placed in the <90 day hazardous waste storage area outside the ElChrome Department. Anodes in the plating room are composed of lead which degrades after time and produces a D008 lead sludge waste. The lead sludge is washed from the plating tank frames into a drain which leads to a 110 gallon container in the basement. When the container becomes full, the contents are emptied into wooden plastic lined boxes which are then transferred to the roll-off box in the <90 day storage area. This process produces a 99.7% pure chrome product which is used to make jet airplane turbines. Wastewaters from the northside production processes are conveyed to the UNOX wastewater treatment plant located at the plant. After treatment at UNOX, wastewaters are conveyed to the north impoundment.

The ElMang Department, the former electrolytic manganese plating operation, was shut down in 1999. The building is now used as a work area for contractors.

The Simplex Department on the northside of the plant, manufactures pure chromium products. Chromium produced at ElChrome is pressed into bricks and placed in a furnace where a vacuum is applied to drive off oxygen and other impurities. The result is a 99.9% pure chromium product.

Furnaces #1, #12, and #18 on the southside of the plant produce standard ferromanganese and silicomanganese alloys that are used to strengthen steel. Scrubber sludges generated at each of the furnaces are conveyed to the southside settling ponds and then mudcatted to the north impoundment during the warmer months. Scrubber sludges from #1 furnace that are too heavy to gravity drain to the settling ponds are vacuumed out and taken directly to the North impoundment disposal area.

Eramet has maintenance shops and a Loco shop where plant equipment and plant vehicles are maintained.

The UNOX wastewater treatment plant, located on the northside of the plant property, treats wastewaters from ElChrome, and Eveready Battery Company (an adjacent operation).

Regulatory/Enforcement History:

The last compliance evaluation inspection at Eramet, on March 16, 17, and 22, 2005, resulted in violations that were documented in a April 25, 2005 Notice of Violation letter. Director's Final Findings & Orders were sent to Eramet on December 27, 2005. Negotiations with Eramet on the Findings & Orders continue.

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes* _____ No X

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

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

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

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

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

Safety Equipment Used:

GENERAL REQUIREMENTS

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

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

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

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

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

NOTE: Complete appropriate checklist for each unit.

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

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

MANIFEST REQUIREMENTS

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

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

- | | | | |
|--|---|-----------------------------|------------------------------|
| 14. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
|--|---|-----------------------------|------------------------------|

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

- | | | | |
|---|------------------------------|-----------------------------|---|
| 15. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
|---|------------------------------|-----------------------------|---|

- | | | | |
|---|---|-----------------------------|------------------------------|
| 16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
|---|---|-----------------------------|------------------------------|

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

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

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

PERSONNEL TRAINING

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

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

| Job Performed | Name of Employee | Date Trained |
|---------------|------------------|--------------|
| | | |

CONTINGENCY PLAN

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

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

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

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

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

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

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

EMERGENCY PROCEDURES

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

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

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

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

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

PREPAREDNESS AND PREVENTION

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SATELLITE ACCUMULATION AREA REQUIREMENTS

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

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

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

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

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

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

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

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

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

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

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

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

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

PRE-TRANSPORT REQUIREMENTS

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

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

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS

1. Does the generator manage used oil in a surface impoundment or waste pile? If yes: Yes No N/A
- a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] Yes **No** N/A
2. Is used oil used as a dust suppressant? [3745-279-12(B)] **Yes** No N/A
3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? Yes **No** N/A

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil? If so, Yes No N/A
- a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] Yes **No** N/A

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

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

NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6. Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] Yes **No** N/A
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes **No** N/A
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes **No** N/A
9. Has the generator, upon detection of a release of used oil, done the

following: [3745-279-22(D)]

- a. Stopped the release? Yes No N/A
- b. Contained the release? Yes No N/A
- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A

ON-SITE BURNING IN SPACE HEATER

- 10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: Yes No N/A
 - a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes No N/A
 - b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A
 - c. Are the combustion gases from heater vented to the ambient air? Yes No N/A

GENERATOR TRANSPORTATION

- 11. If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24] Yes No N/A
 - a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24] Yes No N/A
 - b. Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24] Yes No N/A

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

COLLECTION CENTERS AND AGGREGATION POINTS

- 12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes No N/A
- 13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes No N/A
- 14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes No N/A

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.

Keyword: UsedOilChecklistforGenerators.Oct.2007.doc

LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] (possibly also cite 3745-52-11) **If so:** Yes ___ No N/A ___ RMK# 1
- a. **For determinations based solely on knowledge of the waste:** Is supporting data retained on-site? [3745-270-07(A)(6)] Yes ___ No N/A ___ RMK# 1
- b. **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes ___ No N/A ___ RMK# 1
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] (possibly also cite 3745-52-11) Yes ___ No N/A ___ RMK# 1
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes ___ No N/A ___ RMK# 1
4. Does the generator generate a characteristic hazardous waste? **If so:** Yes ___ No ___ N/A ___ RMK# ___
- a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes ___ No N/A ___ RMK# 2

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 ___ N/A ___ RMK# ___
- 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 N/A ___ RMK# ___

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 N/A ___ RMK# 2
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 N/A RMK#

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 C.A. equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of C.A., 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 N/A RMK#

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 N/A RMK#

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 N/A RMK#

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 N/A RMK#

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 N/A RMK#

a. Has the facility complied with 3745-270-04? Yes No N/A RMK#

REMARKS

1) The following materials, observed during the inspection, have not been adequately evaluated to determine if they are hazardous wastes:

- (1) Contents of a 5-gallon container labeled "Dupont epoxy mastic" in the dam hollow area, and
- (2) Contents of containers in box trailer at the dam hollow area

- # 2) If any of the above materials are determined to be hazardous wastes, other LDR requirements will have to be met.

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? [3745-270-07(A)(2)] Yes ___ No N/A ___ RMK# 2

- 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? [3745-270-07(A)(3)] Yes ___ No N/A ___ RMK# ___

- 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? [3745-270-07(A)(4)] Yes ___ No N/A ___ RMK# ___

- 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? [3745-270-07(A)(9)] Yes ___ No N/A ___ RMK# ___

- 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:
 - 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 N/A ___ RMK# ___

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 N/A ___ RMK# 2

REMARKS

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

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

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

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes No N/A ___ RMK# ___
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes No N/A ___ RMK# ___

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes ___ No N/A RMK# ___
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes ___ No N/A RMK# ___
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes ___ No N/A ___ RMK# ___
 - b. Mix battery types in one container? Yes ___ No N/A ___ RMK# ___
 - c. Discharge batteries to remove the electric charge? Yes ___ No N/A ___ RMK# ___
 - d. Regenerate used batteries? Yes ___ No N/A ___ RMK# ___
 - e. Disassemble them into individual batteries or cells? Yes ___ No N/A ___ RMK# ___
 - f. Remove batteries from consumer products? Yes ___ No N/A ___ RMK# ___
 - g. Remove the electrolyte from the battery? Yes ___ No N/A ___ RMK# ___
- If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] Yes No ___ N/A RMK# ___

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] Yes ___ No N/A RMK# ___

a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] Yes ___ No N/A RMK# ___

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] Yes ___ No N/A RMK# ___

7. Are the battery(ies) or container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)] Yes ___ No N/A RMK# ___

UNIVERSAL WASTE LAMPS

8. Does the SQGUHW 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? [3745-273-13(D)(1)] Yes No N/A ___ RMK# ___

9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] Yes ___ No N/A RMK# ___

10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)] Yes ___ No N/A ___ RMK# ___

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

generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

11. Is the waste accumulated for less than one year? Yes No N/A RMK#
[3745-273-15(A)] If not:
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes No N/A RMK#

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

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes No N/A RMK#
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes No N/A RMK#
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes No N/A RMK#
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes No N/A RMK#
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes No N/A RMK#
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes No N/A RMK#
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes No N/A RMK#

EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] Yes No N/A RMK#

RESPONSE TO RELEASES

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

OFF-SITE SHIPMENTS

NOTE: *If a SQUWH self-transport waste, then they must comply with the Universal Waste transporter requirements.*

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes No N/A RMK#

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

18. 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? [3745-273-18(C)] Yes No N/A RMK#
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No N/A RMK#
20. 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? [3745-273-18(E)(1)] Yes No N/A RMK#

b. Agree to where the shipment will be sent? [3745-273-18(E)(2)]

Yes ___ No ___ N/A RMK# ___

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

Yes ___ No N/A RMK# ___

a. Sending the waste back to the originating handler? [3745-273-18(F)(1)]

Yes ___ No ___ N/A RMK# ___

b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)]

Yes ___ No ___ N/A RMK# ___

22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]

Yes ___ No N/A RMK# ___

23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)]

Yes ___ No N/A RMK# ___

EXPORTS

24. Is waste being sent to a foreign destination? If so:

Yes ___ No N/A ___ RMK# ___

a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]

Yes ___ No N/A RMK# ___

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)]

Yes ___ No N/A RMK# ___

c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]

Yes ___ No N/A RMK# ___

REMARKS

1) Boxes of fluorescent bulbs in the maintenance department were not labeled properly; however, Eramet properly labeled the boxes during the inspection to return to compliance.



















