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1. Article Addressed to:
 W. J. Kandel
 Solvay Advanced Polymers
 PO Box 446
 S.R. 7 South
 Marietta, OH 45750

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent Addressee
 X *[Signature]*

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 Scott Patterson

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Sent to:
 W. J. Kandel, Solvay Advanced Polymers
 PO Box 446, S.R. 7 South
 Marietta, OH 45750

PS Form 3806, August 2006 See Reverse for Instructions



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

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

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

March 21, 2008

**WASHINGTON COUNTY
SOLVAY ADVANCED POLYMERS
DHWM/SEDO
OHD981529688
Permit #04-84-0194
Certified Mail 70063450000190546826**

Mr. W. J. Kandel, Plant Manager
Solvay Advanced Polymers, LLC
P.O. Box 446
State Route 7 South
Marietta, Ohio 45750

**Subject: Ohio EPA Annual Hazardous Waste Inspection Notice of Violation and
Comments on Facility Operations**

Dear Mr. Kandel:

On March 3, 2008, Scott Bergreen and I inspected Solvay Advanced Polymers' (Solvay) facility in Marietta, Ohio to determine Solvay's compliance with their Part B Hazardous Waste Permit and Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). Our site visit included an inspection of company operations and a review of facility records. During the inspection, Solvay was represented by Mark Potochnik and Jean Anderson.

This letter will explain the violations found and other general concerns identified during the inspection.

The following violations of Ohio's hazardous waste laws were identified by the inspection. In order to correct these violations you must do the following and send Ohio EPA the required information **within 30 days** of your receipt of this letter:

- (1) **OAC Rule 3745-54-15, General Inspection Requirements;
Permit Condition B.5, General Inspection Requirements; and
Permit Condition E.5, Inspection Schedules and Procedures:**

The owner or operator must develop and follow a written schedule for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (such as dikes and sump pumps) that are important to preventing, detecting, or responding to environmental or human health hazards.

Conditions B.5 and E.5 of the permit require Solvay to follow the inspection schedules found in Appendix G-2 of the approved permit application. Appendix G-2 requires weekly and storm event inspections of the Emergency Basin. These inspections must be recorded on the WWTP inspection log sheet. In the past year there have been eleven instances where inspections of the basin were done less than weekly. Those eleven instances are as follows: from May 4, 2007 to May 16, 2007; June 8, 2007 to June 19, 2007; August 31, 2007 to September 10, 2007; September 11, 2007 to September 21; October 1, 2007 to October 9, 2007; November 26, 2007 to December 4, 2007; December 11, 2007 to December 21, 2007; and December 23, 2007 to January 1, 2008; January 1, 2008 to January 15, 2008; January 18, 2008 to January 28, 2008; and February 18, 2008 to February 26, 2008.

In Ohio EPA compliance inspections conducted on December 30, 2002 and March 28, 2005, Solvay was cited for this same violation. The repeated failure to conduct Emergency Basin inspections according to schedule indicates a need to train employees on the inspection requirements for the Emergency Basin. In order to return to compliance with this rule and the permit conditions, please provide documentation that the Solvay employees responsible for conducting these inspections have been informed of the inspection requirements and received training on the inspections.

(2) **Permit Condition C.6, Containment Systems:**

Spilled or leaked waste and accumulated precipitation must be removed within 24 hours from the time the spilled and/or leaked waste is discovered to have reached the pad sump of the > 90 day container storage area.

Inspections logs for the permitted > 90 day hazardous waste storage area indicate that the dike drain was observed to be full of rainwater on July 18, 2007 and that corrective action of pumping the water out was not done until July 25, 2007, in violation of this permit condition.

In order to return to compliance with this permit condition please respond with a written description of what steps Solvay will take to ensure that any liquids discovered in the sump of the > 90 day hazardous waste storage area are removed within 24 hours.

(3) **OAC Rule 3745-54-15, General Inspection Requirements; and Permit Condition C.8, Inspection Schedules and Procedures:**

The owner or operator must develop and follow a written schedule for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (such as dikes and sump pumps) that are important to preventing, detecting, or responding to environmental or human health hazards.

To comply with OAC Rule 3745-54-15, Permit Condition C.8 requires Solvay to follow the inspection schedule in Appendix G-2 of the permit application. This schedule requires that the permitted storage area be inspected weekly. The weekly inspections are required to be recorded on an inspection log. In the past year there have been six instances where inspections of the > 90 day permitted storage area were done less than weekly as documented by the inspection log. Those six instances are as follows: from

February 27, 2007 to March 7, 2007; from March 7, 2007 to March 15, 2007; from April 4, 2007 to April 12, 2007; from May 7, 2007 to May 16, 2007; from May 30, 2007 to June 8, 2007; and from July 31, 2007 to August 8, 2007.

In order to return to compliance with this rule and Permit Condition C.8, please provide documentation that the Solvay employees responsible for conducting the inspections of the > 90 day permitted storage area have been informed of the inspection timing requirements and received training on the inspections.

(4) **Permit Condition G.3, Post-Closure Procedures and Use of Property:**

Permit Condition G.3 requires Solvay to maintain the integrity and effectiveness of the final cover, including making repairs as necessary to correct the effects of settling, subsidence, and erosion. The permit condition also requires Solvay to prevent run-on and run-off from eroding or otherwise damaging the final cover.

As previously discussed in Ohio EPA's February 1, 2008 correspondence to Solvay, The final cover of the Former Equalization Basin (FEQB) was observed to have tire ruts, areas of subsidence where water is ponding, a pile of gravel at the northwestern corner, and a gravel roadway running north-south on its western side.

In a letter dated February 29, 2008, Solvay responded with a plan to fill and reseed depressed areas and remove the pile of gravel this spring. Solvay also stated in the letter that the "roadway doesn't interfere or disturb the integrity of the final cover, liners, any components of the containment system, of the function of the facility's monitoring system."

According to the November 30, 1995 Equalization Basin Closure Certification Report, final grade of the FEQB cover was sloped at a minimum of 0.5 percent to drain surface water to catch basin #2 near the southeast corner of the FEQB. Solvay should not only fill depressed areas but restore the grade such the covered FEQB drains to catch basin #2 as designed.

As built engineering drawings in the Equalization Basin Closure Certification Report show the final cover of the FEQB extending to within 2 feet of the vacuum system manifold piping. Based on these drawings, Ohio EPA believes that the roadway, which runs parallel to the manifold piping, is built on top of the final cover and has therefore disturbed the integrity of the final cover in violation of the Part B Permit.

At a minimum, to return to compliance Solvay must restore the FEQB cover to the proper slope by re-grading the area, re-surface all depressions and ruts, and implement a barrier system to limit vehicle access onto the FEQB. Further, Ohio EPA and Solvay should schedule a conference call to discuss road placement and its potential impact on the cover. Depending on information provided regarding road construction, additional action to return to compliance may be required.

- (5) **OAC Rule 3745-66-73(A), Management of Containers:**
A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.

At the time of the inspection the snap ring on a 55-gallon drum in the < 90 day storage area for Building 2 was not closed. The drum was closed by Mark Potochnik during the inspection, returning Solvay to compliance with this rule during the inspection.

- (6) **OAC Rule 3745-66-74, Inspections:**
The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The inspections must be recorded in an inspection log or summary. Per ORC§1.44(A) "Week" means 7 consecutive days.

Solvay inspects all three of their <90 day storage areas on a regular basis, however, during the past year there were four instances when the time between inspections was greater than seven days. Inspections of the <90 day storage areas at Building 2 and in Building 92 did not occur within seven days during the following time periods: from January 31, 2007 to February 8, 2007; from February 27, 2007 to March 7, 2007; from March 20, 2007 to March 29, 2007; and from May 30, 2007 to June 8, 2007. Also, the inspection of the <90 day storage area for the methyl chloride isotainer tank truck exceeded the seven day interval between May 30, 2007 and June 8, 2007.

In order to return to compliance with this rule, please provide documentation that the Solvay employees responsible for conducting the inspections of the < 90 day storage areas have been informed of the inspection timing requirements and received training on the inspections.

Comments

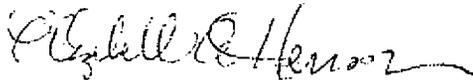
- (A) During our walk through of the wastewater treatment plant area, we observed that piles of gravel fill had been placed on the access road that runs parallel to the western side of the Equalization Basin. As a result, the ground surface around a number of the monitoring wells along the access road is covered by a foot or more of gravel. Appendix E-1 of Solvay's Part B Permit requires yearly inspections of all water level and water quality wells in the monitoring network. As a part of the yearly inspection, the casing stickups and cement surface seals on each well must be examined. Any gravel or debris that is obscuring the surface area around the wells will need to be removed for the annual inspection so that a proper evaluation of each well's integrity can be done.
- (B) Appendix G-1 of Solvay's Part B Permit requires semi-annual inspections of the wastewater treatment plant security fence. The inspections are required to be reported on a log sheet and any deficiencies reported to the appropriate supervisor. When reviewing the log sheets, I observed that the same defects in the fence were being noted repeatedly, indicated that they were not being repaired when first reported. Facility personnel indicated that the problems noted with the fence were not deemed to be compromising security. When this is the case, more follow up documentation should be

included on the log sheets to indicate when corrective action has been done or if a decision has been made that a repair is not warranted, supporting documentation of this should be included on the log.

- (C) During the inspection, an enclosed roll-off-box of non-hazardous radel salt cake was being stored in the > 90 day storage area. It was reported that when screening or process knowledge indicates the possibility that a container of radel salt cake could be hazardous, the container of waste is sampled and held in the >90 day storage area pending sample results. Solvay's Part B Permit indicates that hazardous waste in the container storage area will be stored in drums or 5-gallon steel pails. The Permit does not include a provision for storing other types of containers in the permitted storage area. If Solvay will be using the >90 day storage area for storing hazardous waste in other types of containers besides drums or 5-gallon pails, Solvay must apply for a permit modification to cover this practice.
- (D) The inspection log for the > 90 day permitted storage indicated that on September 5, 2007 there were nine drums in the drying bed area. Please provide more information about the nine drums that were stored in the drying bed.

Enclosed you will find a copy of the checklists completed during the inspection. Should you have any questions, please feel free to call me at (740) 380-5248. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/opp>.

Sincerely,



Elizabeth A. Herron
Environmental Specialist
Division of Hazardous Waste Management

EH/dh

Enclosures

NOTICE:

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

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

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

For Ohio EPA use only

2. Site EPA ID No.	EPA ID Number: OHD981529688								
3. Site Name	Name: Solvay Advanced Polymers, L.L.C.					Website (optional:)			
4. Site Location Information	Street Address: 17005 State Route 7								
	City, Town, or Village: Marietta				State: OH				
	County Name: Washington				Zip Code: 45750				
5. Site Land Type (check only one)	Private	County	District	Federal	Indian	Municipal	State	Other	
	<input checked="" type="checkbox"/>								
6. NAICS code(s) www.census.gov/epcd/www/naics.html	A. 325211			B.					
	C.			D.					
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: Mark		MI: A.	Last Name: Potochnik					
	Phone Number: 740 374-6563			Phone Number Extension:					
	E-Mail Address: mark.potochnik@solvay.com								
	Fax Number: 740 374-6565			Fax Number Extension:					
	Street or P.O. Box: P.O. Box 446								
	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.	A. Name of Site's Legal Owner:			Date Became Owner (mm/dd/yyyy):					
	Solvay Advanced Polymers, L.L.C.			11/01/2001					
	Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
		<input checked="" type="checkbox"/>							
	Street or P.O. Box: 4500 McGinnis Ferry Road								
	City, Town, or Village: Alpharetta			Owner Phone #: 770 772-8200					
	State: GA		Country: USA		Zip Code: 30202				
	B. Name of Site's Operator:			Date Became Operator (mm/dd/yyyy):					
	Solvay Advanced Polymers, L.L.C.			11/01/2001					
	Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
	<input checked="" type="checkbox"/>								
Street or P.O. Box: P.O. Box 446									
City, Town, or Village: Marietta			Operator Phone #: 740 373-9242						
State: OH		Country: USA		Zip Code: 45750					
9. Violations Cited?	<input checked="" type="checkbox"/>	Yes		<input type="checkbox"/>	No				
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)									
<input type="checkbox"/> Not Regulated									

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Solvay Advanced Polymers Facility Type: LQG/TSD EPA ID#: OHD981529688

Description of Waste				On-Site Management			Off-Site Management
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	Waste Generated (e.g. sludge, spent solvent, ash, etc)	EPA Waste Code	QTY Generated per Month (average based on yearly generation for 2007)	Type of Accumulation/Storage (e.g. container, tank, etc)	Type of On-Site Treatment (recycle, wwt, etc)	Waste Location (Include map if possible)	Name, state, and type of activity occurring at the facility.
1. radel production (aka MPPU)	radel kettle bottoms containing spent chlorobenzene	F002 D001 D021	10 tons	55-gallon drums	not applicable	< 90 day multi-purpose storage area	Spring Grove Resource Recovery (OH) fuel blending Ross Incineration (OH) incineration
2. radel production (aka MPPU)	radel residue containing chlorobenzene and resins	D001 D021	2.66 tons	55-gallon drums	not applicable	< 90 day multi-purpose storage area	Spring Grove Resource Recovery Inc.(OH) fuel blending Ross Incineration (OH) incineration
3. polysulfone production	polysulfone kettle bottoms containing spent chlorobenzene	F002 D001 D007 D010 D021	2.75 tons	55-gallon drums	not applicable	< 90 day multi-purpose storage area	Spring Grove Resource Recovery Inc.(OH) fuel blending Ross Incineration (OH) incineration
4. polysulfone production	polysulfone residue containing chlorobenzene and resins	D001 D021	1.42 tons	55-gallon drums	not applicable	< 90 day multi-purpose storage area	Spring Grove Resource Recovery Inc.(OH) fuel blending Ross Incineration (OH) incineration
5. polysulfone production	polysulfone tars containing spent chlorobenzene	F002 D001 D021	0.92 tons	55-gallon drums	not applicable	< 90 day multi-purpose storage area	Spring Grove Resource Recovery Inc.(OH) fuel blending Ross Incineration (OH) incineration

Description of Waste				On-Site Management			Off-Site Management	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	Waste Generated (e.g. sludge, spent solvent, ash, etc)	EPA Waste Code	QTY Generated per Month (based on average yearly generation)	Type of Accumulation/Storage (e.g. container, tank, etc)	Type of On-Site Treatment (recycle, wwt, etc)	Waste Location (Include map if possible)	Name, state, and type of activity occurring at the facility.	
6	polysulfone and radel production	chlorobenzene contaminated wastewaters	D021	66 tons	emergency basin	wastewater treatment plant	wastewater treatment plant with NPDES discharge	not applicable
7	laboratory analytical wastes	lab glassware, polymer residue and solvents	D001 D021 D022 F002 F003	1.5 tons	55-gallon drums	not applicable	< 90 day area behind Building 2	Spring Grove Resource Recovery Inc.(OH) <i>fuel blending</i>
8	polymer production	waste chlorobenzene (aka MCB)	D001 D021	42 pounds	55-gallon drums	not applicable	< 90 day multi-purpose storage area	Spring Grove Resource Recovery Inc.(OH) <i>fuel blending</i> Ross Incineration (OH) <i>incineration</i>
9	radel unit - filtration through media of polymer solution	radel salt residue, chlorobenzene	D021	1 ton	drums or vac box	not applicable	> 90 day storage area at wastewater treatment plant	Clean Harbors El Dorado (AR) <i>incineration</i>
10	radel unit - air pollution control device collecting methyl chloride used in batch termination	waste methyl chloride	D001 D021	1.75 tons	tanker truck isotainer	not applicable	the < 90 day storage area which is located east of building #92	Clean Harbors El Dorado (AR) <i>incineration</i>

Description of Waste				On-Site Management			Off-Site Management	
Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	Waste Generated (e.g. sludge, spent solvent, ash, etc)	EPA Waste Code	QTY Generated per Month (average based on yearly generation)	Type of Accumulation/Storage (e.g. container, tank, etc)	Type of On-Site Treatment (recycle, wwt, etc)	Waste Location (Include map if possible)	Name, state, and type of activity occurring at the facility.	
11	maintenance related activities	waste aerosols	D001	212 pounds	55-gallon drums	not applicable	maintenance areas	Spring Grove Resource Recovery Inc.(OH) <i>storage/bulking/transfer</i> Ross Incineration (OH) <i>incineration</i>
12	parts washers used for maintenance	ignitable degreaser	D001	583 pounds	55-gallon drums	not applicable	< 90 day multi-purpose storage area	Spring Grove Resource Recovery Inc.(OH) <i>fuel blending</i> Ross Incineration (OH) <i>incineration</i>
13	lighting	waste fluorescent bulbs	universal waste	varies	container	not applicable	storage trailer	Mercury Waste Solution Inc. recycling
14	equipment maintenance	waste batteries	universal waste	16 pounds	container	not applicable	< 90 day multi-purpose storage area	Ross Incineration (OH) <i>incineration</i>
15	equipment maintenance	used oil	N/A	2625 pounds	55-gallon drums	not applicable	< 90 day multi-purpose storage area Spring Grove Resource Recovery Inc.(OH) <i>fuel blending</i>	Spring Grove Resource Recovery Inc.(OH) <i>fuel blending</i>

REMARKS-GENERAL INFORMATION

General Process Information

Solvay Advanced Polymers, LLC. produces polysulfone and radel engineering polymers for use in the manufacture of medical devices, food contact uses, electronic devices, chemical process equipment, and automotive applications. The Solvay facility also processes the polymers, amodel and xydar, in their compounding unit. The amodel and xydar are manufactured off-site and processing at Solvay does not generate any hazardous waste.

Satellite Accumulation Areas

The facility has two satellite accumulation areas associated with the polysulfone unit: polysulfone kettle bottoms within the manufacturing area and polysulfone tars inside the extruder room. The radel (MPPU) unit has satellite areas for the radel residue and radel trash bucket. Throughout the plant there are satellite accumulation areas for waste aerosol cans. Solvay's lab, which is located on the second floor of Building 2, has a satellite accumulation area for lab waste.

< 90 Day Storage

Solvay maintains three < 90 day storage areas.

- 1) An outdoor area located against the north side of Building 2 - used mainly for the storage of waste generated by the facility's laboratory
- 2) Building 92 - a three sided shelter southeast of the radel unit, is Solvay's main storage area for hazardous waste
- 3) East of Building 92 a cement pad where an isotainer tanker truck is used to store waste methyl chloride from the radel unit

> 90 Day Storage

Solvay maintains a RCRA Part B permitted storage area at their wastewater treatment plant.

Parts Washers

Solvay generates an ignitable waste degreaser from four parts washers. Two parts washers are located in the maintenance area of Building 2, and one parts washer in the compounding maintenance area and one in the wastewater treatment plant maintenance shop.

Regulatory/Enforcement History

Solvay is a large quantity generator of hazardous waste. The facility has a Part B RCRA permit for > 90 day storage, treatment of hazardous wastewaters in the emergency basin, post-closure care of a closed equalization basin, and corrective action of the wastewater treatment plant area. This permit was last renewed on August 7, 2001, and will expire on August 7, 2011.

**OHIO PART B PERMITTED FACILITY
RCRA INSPECTION CHECKLIST**

Facility: Solvay Advanced Polymers Ohio Permit: 04-84-0194
 Address: P.O. Box 446 U.S. EPA ID: OHD981529688
Marietta, OH 45750 Phone: (740)374-6573
 County: Washington

Inspection Date: March 3, 2008 Time: 9:00 AM - 3:30 PM

Was advance of the inspection given? YES NO

If so, how far in advance? 4 days

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspectors:	<u>Elizabeth Herron</u>	<u>Ohio EPA, Env. Spec.</u>	<u>740-380-5248</u>
	<u>Scott Bergreen</u>	<u>Ohio EPA, Env. Spec.</u>	<u>740-380-5288</u>
Facility Reps:	<u>Mark Potochnik</u>	<u>Solvay Advanced Polymers</u>	<u>740-374-6573</u>
	<u>Jean Anderson</u>	<u>Solvay Advanced Polymers</u>	<u>740-374-6085</u>

Is facility operating as a generator? YES NO

If so, complete the applicable sections of the Generator Requirements checklist for wastes being managed under generator status.

PERMIT STATUS

Permit Issued: August 7, 2001
 Permit Effective Date: August 7, 2001
 Permit Expiration Date: August 7, 2011

AUTHORIZED ACTIVITIES

STORAGE		TREATMENT		DISPOSAL	
<input checked="" type="checkbox"/>	Containers		Tank		Injection Well
	Tank	<input checked="" type="checkbox"/>	Surface Impoundment		Landfill
	Waste Pile		Incinerator		Land Application
	Surface Impoundment		Thermal Treatment		Surface Impoundment

Post-Closure Care Corrective Action

GENERAL CONDITIONS OF PERMIT

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1. Has the expiration date of the permit passed? If so: Yes ___ No N/A ___ RMK# ___
- a. Is the Permittee continuing any activity regulated by the permit after the expiration date of the permit? Yes ___ No N/A RMK# ___
- b. Has the Permittee submitted an application for a permit renewal to the director no later than 180 days prior to the expiration date of the permit? [or upon a later date if the Permittee can demonstrate good cause for late submittal] [Condition A.6.(a)] Yes ___ No N/A RMK# ___

NOTE: *The Permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:*

- i. The Permittee has submitted a timely and complete application for a renewal permit under OAC rule 3745-50-40; and*
- ii. Through no fault of the Permittee, a new permit has not been issued pursuant to OAC rule 3745-50-40 on or before the expiration date of the permit. [Condition A.6.(b)]*

2. Has the Permittee submitted the annual permit fee, payable to "Treasurer, State of Ohio," to Ohio EPA on or before the anniversary date of issuance during the term of the permit? [Condition A.26] Yes No N/A ___ RMK# ___
3. Is the Permittee conducting any hazardous waste management activities (not otherwise exempt by law) which are not authorized by the permit? [Condition A.1.(b) and A.5.] Yes No N/A ___ RMK# ___

NOTE: *If any of the provisions of the permit have been held invalid the remainder of the permit is not affected by that holding. [Condition A.4.]*

4. Has the Permittee identified any instances of noncompliance with the permit, RC Chapter 3734. or the rules adopted thereunder which may endanger human health or the environment? If so, Yes No N/A ___ RMK# ___
- a. Did the Permittee report orally the incident to Ohio EPA's Division of Emergency and Remedial Response (DERR) within two hours from becoming aware of the circumstances? [Condition A.20.(a)] Yes ___ No N/A RMK# ___

- b. After initial notification, did the Permittee immediately report to Ohio EPA's DERR any subsequent changes in the situation as conditions warranted until such time as all information as required by Condition A.20.(b) was submitted? Yes ___ No N/A RMK# ___

NOTE: Condition A.20.(b) requires that the Permittee report orally the following information; and Condition A.21(b) requires the Permittee provide a written report including the following information:

1. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and
2. Information concerning a release of any hazardous waste, fire or explosion at the facility which could threaten human health or the environment, including a description of:
 - a. Name, address and telephone number of the owner/operator.
 - b. Name, address and telephone number of facility.
 - c. Name and quantity of materials(s) involved.
 - d. The extent of injuries, if any.
 - e. An assessment of the actual or potential hazard to the environment and human health inside and outside the facility where applicable.
 - f. Estimate quantity and disposition of recovered material that resulted from the incident

5. Did the Permittee provide a written report to Ohio EPA's DERR within five days of the time the Permittee became aware of the circumstances reported in Question 4? [Condition A.21.(b)] If so, did the report contain: Yes ___ No N/A RMK# ___

- a. A description of the noncompliance (including exact dates and times)? Yes ___ No N/A RMK# ___
- b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? and Yes ___ No N/A RMK# ___
- c. Steps taken or planned to minimize the impact on human health and the environment and to reduce and prevent recurrence of the noncompliance? Yes ___ No N/A RMK# ___

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

6. Has the Permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8.] Yes ___ No N/A RMK# ___
7. Has the Permittee identified any other instances of noncompliance not provided for in Condition A.22.? Yes ___ No N/A RMK# ___
- a. If so, did the Permittee report these instances to Ohio EPA's DHWM within a month of the time at which the Permittee is aware of the noncompliance? [Condition A.22.] Yes ___ No N/A RMK# ___
- b. Do the reports provided contain the information set forth in Condition A.20.? Yes ___ No N/A RMK# ___
8. Has the Permittee planned any changes in the permitted facility or activity which may result in noncompliance with the conditions of the permit? Yes ___ No N/A ___ RMK# ___
- a. If so, has the Permittee provided Ohio EPA with advance notice of such changes? [Condition A.17.] Yes ___ No N/A RMK# ___

NOTE: Such notification does not waive the Permittee's duty to comply with the permit pursuant to Conditions A.5. and A.14.

PERMIT MODIFICATION, REVISION, REVOCATION

1. Has the Permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.] Yes No ___ N/A ___ RMK# ___
2. Has the permit been transferred to a new owner/operator? [Condition A.18.] Yes ___ No N/A ___ RMK# 1
- a. If so, has the transfer been conducted in accordance with RC Chapter 3734. and the rules adopted thereunder? and [Condition A.18.] Yes ___ No N/A RMK# ___

b. Before transferring ownership did the Permittee notify the new owner in writing of the requirements of RC Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.18.]

Yes ___ No N/A RMK# ___

NOTE: The Permittee's failure to notify the new owner or operator of the requirements of the applicable Ohio law or hazardous waste rules does not relieve the new owner or operator of its obligation to comply with all applicable requirements. [Condition A.18.(c)]

3. If the Permittee is subject to a compliance schedule (OAC rule 3745-50-58(L)(5) and 3745-50-50 has the Permittee submitted reports of compliance or noncompliance with, or any progress reports on the requirements contained in any compliance schedule of the permit to Ohio EPA no later than 14 days following each scheduled date, unless otherwise specified? [Condition A.19.]

Yes ___ No N/A RMK# ___

4. Has the Permittee furnished relevant information which the Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, or to determine compliance with the permit? [Condition A.10.]

Yes ___ No N/A RMK# ___

5. Has the Permittee furnished Ohio EPA, upon request, copies of records required to be kept by the permit? [Condition A.10.]

Yes No N/A ___ RMK# ___

6. Has the Permittee become aware that it failed to submit any relevant facts in the permit or issuance proceedings or that it submitted incorrect or incomplete information in permit issuance proceedings, or other submissions to Ohio EPA or the Hazardous Waste Facility Board (HWFB)? If so,

Yes ___ No N/A ___ RMK# ___

a. Has the Permittee promptly submitted such facts or corrected information to the appropriate entity? [Condition A.24.]

Yes ___ No N/A RMK# ___

7. Is the Permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications to the application? [Condition A.14.(c)]

Yes No N/A ___ RMK# ___

8. Is the Permittee retaining a complete copy of the approved application on-site? [Condition A.14.(c)] Yes No N/A ___RMK#___
9. Is the Permittee planning any physical alterations or additions to the permitted facility? Yes ___ No N/A ___RMK#___
- a. If so, has the Permittee given notice to the director of such alterations/additions? [Condition A.15.] Yes ___ No N/A RMK#___
- b. Have such changes been made in accordance with OAC rule 3745-50-51? [Condition A.15.] Yes ___ No N/A RMK#___

SITE ENTRY - AVAILABILITY OF RECORDS

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

RECORDKEEPING REQUIREMENTS

CONFIDENTIALITY

1. Has the Permittee requested confidentiality of any information of the permit in accordance with RC Chapter 3734. and the rules adopted thereunder? [Condition A.25.] Yes ___ No N/A ___ RMK# ___

OPERATING RECORD

2. Is the Permittee maintaining a written operating record at the facility as set forth in OAC rules 3745-54-73 and 3745-54-74? [Condition B.22.] Yes No N/A ___ RMK# ___
3. Is the Permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents: [Condition A.28.]
- a. Waste analysis plan in accordance with OAC rule 3745-54-13 and the conditions of the permit? Yes No N/A ___ RMK# ___
- b. Contingency plan in accordance with OAC rule 3745-54-53 and the conditions of the permit? Yes No N/A ___ RMK# ___
- c. Closure plan in accordance with OAC rule 3745-55-12 and the conditions of the permit? Yes No N/A ___ RMK# ___
- d. Cost estimate for facility closure in accordance with OAC rule 3745-55-42 and the conditions of the permit? [estimate only - adequacy of estimate will be evaluated by CO financial assurance personnel] Yes No N/A ___ RMK# ___
- e. Personnel training plan and records required by OAC rule 3745-54-16 and the conditions of the permit? Yes No N/A ___ RMK# ___
- f. Operating record as required by OAC rule 3745-54-73 and the conditions of the permit? Yes No N/A ___ RMK# ___

- g. Inspection schedules developed in accordance with OAC rules 3745-54-15 and 3745-57-92 and the conditions of the permit? Yes No N/A ___RMK#___
- h. Post-closure plan as required by OAC rule 3745-55-18(A) and the conditions of the permit? Yes No N/A ___RMK#___
- i. Annually-adjusted cost estimate for closure and post-closure, as required by OAC rules 3745-55-42 and 3745-55-44 and the conditions of the permit? Yes No N/A ___RMK#___
- j. All other documents required by permit Conditions A.12 and A.14? Yes No N/A ___RMK#___
4. Have any of the documents identified in Question #3 been revised, amended or modified? If so, Yes No N/A ___RMK#___
- a. Has the Permittee submitted the changes to Ohio EPA? [Condition A.28.(b)] Yes No N/A ___RMK#___
- b. Has the Permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.28.(b)] Yes No N/A ___RMK#___
5. Is the Permittee maintaining copies of all inspection logs at the facility for a period of at least three years from the date of inspection? [Condition A.28.(c)] Yes No N/A ___RMK#___
6. Is the Permittee maintaining copies of corrective action reports and records as required by Condition D.1. and D.6. for a period of at least three years after all corrective action activities have been completed? [Condition A.28.(d)] Yes ___ No N/A RMK#___

ANNUAL REPORT REQUIREMENT

7. Is the Permittee complying with annual report requirements set forth in OAC rule 3745-54-75 and the additional report requirements set forth in OAC rule 3745-54-77 and the conditions of the permit? [Condition B.25.] Yes No N/A ___RMK#___

SAMPLING/MONITORING RECORD KEEPING REQUIREMENTS

8. In compliance with Condition A.12.(b) of the permit, do the Permittee's records of monitoring information specify the:
- a. Date(s), exact place(s), time(s) and method(s) of sampling or measurement? Yes No N/A ___RMK#___
 - b. Individual(s) who performed the sampling or measurements? Yes No N/A ___RMK#___
 - c. Date(s) analyses were performed? Yes No N/A ___RMK#___
 - d. Individual(s) who performed the analyses? Yes No N/A ___RMK#___
 - e. Analytical technique(s) or method(s) used? Yes No N/A ___RMK#___
 - f. Results of such analyses? Yes No N/A ___RMK#___
9. Have the methods used to obtain a representative sample of the waste to be analyzed included the appropriate SW-846 Method or an equivalent method specified in the approved WAP? [Condition A.12.(a)] Yes No N/A ___RMK#___
10. Has Ohio EPA requested submittal of any reports or other information required by the conditions of the permit from the Permittee? If so, Yes ___ No N/A ___RMK#___
- a. Have the submittals been signed and certified accordance to OAC rule 3745-50-42? [Condition A.13.] Yes ___ No N/A RMK#___

WASTE MINIMIZATION REQUIREMENTS

11. Has the Permittee submitted a Waste Minimization Report, to Ohio EPA, SEDO and the Technical Assistance Unit, Office of Pollution Prevention of the permit, within 180 days of permit journalization? [Condition A.29.(a) and (c)] Yes No N/A ___RMK#___

12. Following the first submittal as identified above in Question #10, has the Permittee submitted, once every two years, updates to this report as required by Condition A.29.(a) to the Technical Assistance Unit, Office of Pollution Prevention? [Condition A.29.(a)]

Yes No N/A RMK# 2

13. Does the Permittee annually certify in the operating record and the annual report required by OAC rule 3745-54-75(H), (I) and (J) that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the Permittee to be economically practicable? [Condition A.29.(b)]

Yes No N/A RMK#

MANIFEST REQUIREMENTS

1. Is all hazardous waste transported from the facility by a properly registered transporter of hazardous waste in accordance with all applicable laws, rules and standards? [Condition A.16.]

Yes No N/A RMK#

2. Is the Permittee complying with the following manifest requirements set forth in OAC Chapter 3745-52 and OAC rules 3745-54-70, 3745-54-71, 3745-54-72 and 3745-54-76: [Condition B.24.]

a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, U.S. EPA Form 8700-22 and, if necessary, U.S. EPA Form 8700-22A in compliance with OAC rule 3745-52-20(A)?

Yes No N/A RMK#

b. The manifest form used contains all information required by OAC rule 3745-52-20 and the minimum number of copies required by OAC rule 3745-52-22?

Yes No N/A RMK#

c. The Permittee has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with OAC rule 3745-52-20(C)(D)(E)?

Yes No N/A RMK#

d. Prepared manifests have been signed by the Permittee and initial transporter in compliance with OAC rule 3745-52-23?

Yes No N/A RMK# _____

3. Has the Permittee received a return copy of each completed manifest within 35 days of the date the waste was accepted by the initial transporter?

Yes No N/A RMK# _____

a. If not, has the Permittee complied with the manifest exception reporting requirements of OAC rule 3745-52-42?

Yes No N/A RMK# _____

WASTE ANALYSIS

1. Does the Permittee have a detailed chemical and physical analysis of waste streams which contains all information necessary to properly treat, store or dispose of the waste in accordance with OAC Chapters 3745-54 to 3745-57 and Condition B.3. of the permit? [OAC rule 3745-54-13(A)(1)]

Yes No N/A RMK# _____

2. Since the last inspection, were any wastes generated by the Permittee from a process or operation that had changed? If so,

Yes No N/A RMK# _____

a. Were the waste analysis procedures described in Appendix C-2 of the approved permit application followed?

Yes No N/A RMK# _____

3. Does the Permittee treat any restricted wastes for which a specified technology (or technologies) has/have been established as the LDR treatment standard?

Yes No N/A RMK# _____

a. If so, is the Permittee using the appropriate technology as required by OAC rule 3745-270-42 (40 CFR 268.42)?

Yes No N/A RMK# _____

GENERAL INSPECTION REQUIREMENTS

1. Is the Permittee following the inspection procedures and schedules described in Appendix G-2 of the approved permit application and the requirements of OAC rules 3745-54-15 and 3745-57-92? [Condition B.5.] Yes ___ No N/A ___ RMK# 3,4
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 a threat to human health? [3745-54-15(A)(1)(2)] Yes No N/A ___ RMK# ___
3. 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# ___
4. Is the Permittee maintaining records of inspections for a minimum of three years? [Condition B.5.] Yes No N/A ___ RMK# ___

SECURITY PROVISIONS/FACILITY OPERATIONS

1. Is the Permittee complying with the security provisions of OAC rule 3745-54-14(B)(1)(2) and (C) and Appendix G-1 of the approved permit application? [Condition B.4.] Yes No N/A ___ RMK# ___
- a. Does the Permittee have an employee at the public access gate 24 hours a day, 7 days a week? Yes No N/A ___ RMK# ___
- b. Has the Permittee inspected the fence which encloses the entire plant semi-annually for breaks, corrosion and effectiveness? Yes No N/A ___ RMK# ___
- c. Are all entry gates and other locations posted with signs prohibiting unauthorized entry? Yes No N/A ___ RMK# ___

2. Is construction, maintenance and operation of the facility being conducted to minimize the possibility of a fire, explosion, or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, ground or surface waters? [Condition B.1.] Yes No N/A ___RMK#___

PERSONNEL TRAINING

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

REQUIRED EQUIPMENT

1. Is the Permittee, at a minimum, maintaining the equipment set forth in the approved contingency plan (Appendix G-3) at the facility? [Condition B.9.] Yes No N/A ___RMK#___
2. Is the Permittee inspecting, testing and maintaining the equipment specified in Question #1 to assure its proper operation as specified in OAC rule 3745-54-33, the inspection plans and Section 7.4 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 7.4 of the approved permit application? [Condition B.11.]

Yes No N/A ___RMK#___

CONTINGENCY PLAN REQUIREMENTS

EMERGENCY PROCEDURES

1. In compliance with Condition B.13.(a) of the permit, does the Permittee make a diligent effort to:
- a. Familiarize the emergency response agencies likely to respond to an emergency at the facility with: the layout of the facility, properties of hazardous waste managed at the facility and associated hazards, places where facility personnel will normally be working, entrances to and roads inside the facility, evacuation routes as depicted in Appendix G-3 of the permit application?
 - b. Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the Permittee, and any further requirements imposed by the permit? and
 - c. Familiarize local ambulance services, fire departments, hospitals and any other local emergency services with the properties of hazardous waste managed at the facility and the types of injuries or illnesses which could result from fires, explosions or a release of hazardous wastes at the facility?

Yes No N/A ___RMK#___

Yes No N/A ___RMK#___

Yes No N/A ___RMK#___

EMERGENCY AUTHORITIES

2. Has a state or local agency declined to enter into the arrangements set forth in OAC rule 3745-54-37(A)? If so,
- a. Has the Permittee documented the refusal in the operating record as required by OAC rule 3745-54-37(B)? [Condition B.13.(b)]

Yes ___ No N/A ___RMK#___

Yes ___ No N/A RMK#___

3. Has the Permittee, in accordance with OAC rule 3745-54-53 submitted a copy of the approved contingency plan (including amendments, revisions or changes) to all local police departments, fire departments, hospitals, and local emergency response teams that may be called upon to provide emergency services? [Condition B.18.(b)] Yes No N/A ___RMK#___
4. Has the Permittee notified the agencies and local authorities in Question #3, in writing, within 10 days of the effective date of any amendments or revisions to the plan? [Condition B.18.(b)] Yes No N/A ___RMK#___
5. Has the Permittee submitted a copy of the approved contingency plan and all revisions, amendments and modifications to Ohio EPA's DERR in accordance with OAC rule 3745-54-53? [Condition B.18.(c)] Yes No N/A ___RMK#___

EMERGENCY COORDINATOR

6. In accordance with OAC rule 3745-54-55 and Condition B.19. of the permit, is an emergency coordinator on premises or on call at all times? Yes No N/A ___RMK#___
7. In accordance with OAC rule 3745-54-55 and Condition B.19. of the permit, is/are emergency coordinator(s) at the facility familiar with the following: contingency plan, facility layout, waste characterization and locations, and locations of all records in the facility? Yes No N/A ___RMK#___
8. In accordance with OAC rule 3745-54-55, does/do the emergency coordinator(s) have the authority to commit the resources needed to carry out the contingency plan? [Condition B.19.] Yes No N/A ___RMK#___

CONTENT OF CONTINGENCY PLAN

9. Does the Permittee have a contingency plan for the facility which contains the following elements as required by Condition B.15. and OAC rule 3745-54-52:

- a. Describes the actions facility personnel shall take to comply with OAC rules 3745-54-51 through 3745-54-56 in response to fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water? Yes No N/A ___ RMK# ___
- b. Describes arrangements agreed to by local police, fire departments, hospitals, contractors and Ohio EPA and the local emergency response team? Yes No N/A ___ RMK# ___
- c. Includes an up-to-date list of names, addresses and phone numbers (office and home) of all persons qualified to act as emergency coordinator in the order that they will assume responsibility for coordination of emergency response? Yes No N/A ___ RMK# ___
- d. Includes a list of all emergency equipment, including fire extinguishing systems, spill control equipment, communications and alarm systems and decontamination equipment? Yes No N/A ___ RMK# ___

AMENDMENT OF PLAN

10. Is the Permittee reviewing the approved contingency plan at least annually and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17.] Yes No N/A ___ RMK# ___

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

IMPLEMENTATION OF PLAN

11. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents at the facility since date of last inspection as described by Condition B.14. of the permit? 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. Did the Permittee collect and manage released material, emergency response material and by-products [unless making a demonstration that such waste is not hazardous in accordance with OAC rules 3745-51-03(C) and (D)]? [Conditions B.14., B.16.] Yes ___ No N/A RMK# ___
- c. 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# ___
- d. 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# ___

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? Yes No ___ N/A ___ RMK# ___
- a. If so, has the plan been amended in accordance with OAC rule 3745-55-12(C)? [Condition B.28.] Yes No N/A ___ RMK# ___

NOTE: Also see Recordkeeping Requirements (Question #4) in order to verify that any changes to the closure plan were submitted in accordance with OAC rule 3745-50-51.

CLOSURE PROCEDURES

3. Has the Permittee closed the facility? If so, Yes ___ No N/A ___ RMK# ___

- a. Was closure conducted in accordance with the closure performance standard of OAC rules 3745-55-10 through 3745-55-20 and 3745-57-90 through 3745-57-93? [Condition B.26.] Yes ___ No N/A RMK# ___
- b. After receiving the final volume of hazardous waste, did the Permittee remove from the facility all hazardous waste and complete closure activities in accordance with the schedule specified in the approved closure plan and as required by OAC rule 3745-55-13? [Condition B.31.] Yes ___ No N/A RMK# ___
- 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.] Yes ___ No N/A RMK# ___
- d. 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# ___
- e. Has the Permittee submitted a survey plat to the director and local zoning authority no later than the submission of certification of closure of each hazardous waste disposal unit? [Condition B.34.] Yes ___ No N/A RMK# ___

REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

1. Does the Permittee follow the procedures for handling ignitable, reactive and incompatible wastes set forth in the Security Procedures and Equipment and Preparedness and Prevention Sections (Section 7.6) of the approved permit application and OAC-rule 3745-54-17? [Condition B.7.(a)] Yes No N/A ___ RMK# ___

2. Does the Permittee, where applicable, ensure that all wiring and electrical equipment at the facility meet the National Fire Prevention Association's standards for hazardous locations as published in "National Electric Code" National Fire Codes, 1985 Edition, Vol. 3, Chapter 5, Special Occupancies, Articles 500-503, pp. 176 through 189? [Condition B.7.(e)] Yes No N/A ___RMK#___
3. Does the Permittee provide and require the use of safety hand tools during all operations involving the handling of ignitable and reactive wastes? [Condition B.7.(c)] Yes No N/A ___RMK#___
4. Does the Permittee prohibit smoking and open flames in areas where hazardous wastes are managed, except when necessary during the course of the treatment process, and post appropriate signs? [Condition B.7.(d)] Yes No N/A ___RMK#___
5. Does the Permittee provide electrical grounding of all containers and tanks, and transport vehicles during all operations involving the handling of ignitable or reactive wastes? [Condition B.7.(b)] Yes No N/A ___RMK#___

HAZARDOUS WASTE MANAGEMENT

CONTAINER MANAGEMENT

1. From the time of the last inspection, has the Permittee stored more than 32,500 gallons of containerized waste at any one time in the permitted container storage area? [Condition C.1.(a)] Yes No N/A ___RMK#___

NOTE: For the purposes of the capacity in Question #1, each container will be considered to be storing an amount equal to its capacity.

2. Does the Permittee ensure that all hazardous wastes are stored in DOT specification steel and overpack drums or 5-gallon containers [as described in Section 4 of the approved Part B permit application] [Condition C.1.(a)] Yes No N/A ___RMK#___

NOTE: The provisions of Conditions C.1.(a) and C.2. do not apply to the Permittee's activities as a generator accumulating hazardous waste on-site for less than 90 days in compliance with OAC rule 3745-52-34(A).

NOTE: For wastes being accumulated under OAC rule 3745-52-34 in the permitted container

storage area, the Permittee shall not for the total amount of waste stored (both more than 90 day and less than 90 day) exceed the 32,500 gallons of hazardous waste.

3. Does the Permittee ensure that only hazardous wastes having hazardous waste codes: D001, D021, F002, F003, D007, D010, and/or D027 are stored in the permitted storage area? [Condition C.2.] Yes No N/A ___RMK#___

NOTE: The Permittee may accumulate hazardous wastes generated on-site for 90 days or less in accordance with OAC rule 3745-52-34.

4. Has the generator marked containers with the words "Hazardous Waste" [OAC rule 3745-52-34(A)(3)]? Yes No N/A ___RMK#___

5. Is the accumulation date on each container [OAC rule 3745-52-34(A)(2)]? Yes No N/A ___RMK#___

6. When container holding hazardous waste is not in good condition, does the Permittee transfer the hazardous waste from such a container to a container in good condition or otherwise manage the waste in compliance with the Permit or the hazardous waste facility chapters of the OAC? [Condition C.3.] Yes No N/A ___RMK#___

7. Does the Permittee store hazardous waste in containers that are compatible with the hazardous waste? [Condition C.4.] Yes No N/A ___RMK#___

8. Does the Permittee conduct container storage within the containment system described in Condition C.1. of the Permit and Section 4 of the approved Part B permit application? [Condition C.5.(a)] Yes No N/A ___RMK#___

9. Does the Permittee keep all containers closed during storage, except when it is necessary to add or remove waste? [Condition C.5.(b)] Yes No N/A ___RMK#___

10. Does the Permittee ensure that containers holding hazardous waste are not opened, handled, or stored in a manner which may rupture the container or cause it to leak? [Condition C.5.(b)] Yes No N/A ___RMK#___

11. Does the Permittee manage lab-packed waste in accordance with the applicable storage requirements? [Condition C.5.(c)] Yes No N/A ___RMK#___

12. Does the Permittee handle lab-pack wastes by packaging the waste in drums containing absorbent material that is compatible with the waste that is placed into that container? [Condition C.5.(d)] Yes No N/A RMK#
13. Does the Permittee maintain a containment system for the permitted container storage area in accordance with the plans and specifications in Section 4 of the Part B permit application? [Condition C.6.(a)] Yes No N/A RMK#
14. Does the Permittee maintain the containment system as follows: [Condition C.6.(b)]
- a. The containment system is designed with sufficient capacity to contain 10% of the total volume of the containers or the volume of the largest container? Yes No N/A RMK#
- b. The containment system is free of cracks and gaps and is sufficiently impervious to contain leaks and spills and accumulated precipitation until collected and material is detected and removed? Yes No N/A RMK#
- c. Does the Permittee ensure that the coating utilized in lining the secondary containment system is compatible with each waste stored in the permitted container storage area? Yes No N/A RMK#
- d. Did the Permittee install a separate secondary containment structure, within the existing containment structure, for those hazardous waste which are deemed incompatible with the liner material? Yes No N/A RMK#
- e. Did the Permittee provide the separate secondary containment structure with liner that will withstand any degrading effects imposed through initial and/or prolonged contact with released waste material? Yes No N/A RMK#
15. Does the Permittee remove spilled or leaked waste or accumulated precipitation within 24 hours from the time the spilled and/or leaked waste is discovered to have reached the hazardous waste pad sump? [Condition C.6.(c)] Yes No N/A RMK# 4

16. Does the Permittee ensure that no wastes are received from off-site for storage at the facility? [Condition C.7.] Yes No N/A RMK#

NOTE: Permittee may accept via pipeline recovery well wastewater from the Union Carbide Corporation remediation project, which wastewater may be hazardous for chlorobenzene (D021) [Condition B.2.(a)]

17. Does the Permittee inspect the container storage area in accordance with the approved inspection schedule contained in Appendix G-2 of the Part B permit application, to detect leaking containers and deterioration of containers and the containment system caused by corrosion and other factors? [Condition C.8.] Yes No N/A RMK# 5

18. Does the Permittee record the inspection described in #17 in the inspection log along with any remedial action taken? [Condition C.8.] Yes No N/A RMK#

19. On days when containerized wastes are added or removed to and/or from any of the permitted areas for storage, does the Permittee conduct an inspection as described in Appendix G-2 of the approved Part B permit application and maintain the inspection results in the facility operating record? [Condition C.8.] Yes No N/A RMK#

20. Does the Permittee ensure that containers holding hazardous waste are not located within 50 feet of the property line? [Condition C.10.(a)] Yes No N/A RMK#

21. Does the Permittee take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and follows the storage procedures specified in Section 7.6 of the permit application? [Condition C.10.(b)] Yes No N/A RMK#

22. If the Permittee has closed the container storage area, did the Permittee:
a. Remove all hazardous waste residues from the containment system in accordance with the procedures in the closure plan set forth in Appendix I-1 of the permit application? [Condition C.13.(a)] Yes No N/A RMK#

- b. If the Permittee demonstrated that not all contaminated soils can be practically removed or decontaminated, did the Permittee close the unit and perform post-closure care following a plan approved by the director? [Condition C.13.(b)]

Yes ___ No N/A RMK# ___

SURFACE IMPOUNDMENT [EMERGENCY BASIN (EB)]

NOTE: *There are two surface impoundments at the Marietta plant, the Former Equalization Basin (FEQB) and the Emergency Basin (EB). The FEQB is no longer used to manage hazardous waste, has undergone closure and is in post-closure. The EB is a component of the wastewater treatment plant and is used to treat wastewaters, which may be hazardous waste because of the characteristic of corrosivity (D002) and/or the characteristic of toxicity for chlorobenzene (D021).*

1. Does the Permittee ensure that only hazardous wastes having hazardous waste codes D002 and D021 in the EB at the facility? [Condition E.2.]

Yes No N/A ___ RMK# ___

2. Does the Permittee maintain two liners and a leachate collection and removal system in accordance with the design plans and reports contained in Section 4.4 of the permit application? [Condition E.3.(a)]

Yes No N/A ___ RMK# ___

3. Does the Permittee manage the leachate collected from the leachate collection and removal system in accordance with the design plans and reports in Section 4.4 of the permit application? [Condition E.3.(a)]

Yes No N/A ___ RMK# ___

4. Does the Permittee operate and maintain the EB in accordance with the plans and reports contained in Section 4.4 of the permit application? [Condition E.3.(b)]

Yes No N/A ___ RMK# ___

5. Does the Permittee operate and maintain the EB to prevent overtopping, in accordance with the detailed design plans and operating practices contained in Section 4.4 of the permit? [Condition E.3.(c)]

Yes No N/A ___ RMK# ___

6. Does the Permittee maintain the EB dikes according to the detailed design plans and operating practices contained in Section 4.4 of the permit application? [Condition E.3.(d)]

Yes No N/A ___ RMK# ___

7. Does the Permittee monitor separately each leak detection system at the EB for the presence of liquids daily? [Condition E.4.(a)] Yes No N/A RMK# _____

8. Does the Permittee completely remove all liquids from each leak detection system as expeditiously as possible? [Condition E.4.(a)] Yes No N/A RMK# _____

9. Does the Permittee manage the liquid according to the plans and procedures described in Section 4.4 of the Part B permit application? [Condition E.4.(a)] Yes No N/A RMK# _____

10. Has there been a sudden drop in the liquid level of the EB, that is not known to be caused by changes in the flow into or out of the surface impoundment or has there been a leak in the dike? [Condition E.4.(b)] Yes No N/A RMK# _____

If so, did the Permittee remove the EB from service immediately and do the following:

a. Immediately shut off flow or stop the addition of wastes into the impoundment? Yes No N/A RMK# _____

b. Immediately contain surface leakage that has occurred or is occurring? Yes No N/A RMK# _____

c. Immediately stop the leak? Yes No N/A RMK# _____

d. Taken steps necessary to prevent catastrophic failure? Yes No N/A RMK# _____

e. Emptied the impoundment if a leak cannot be stopped by any other means? Yes No N/A RMK# _____

f. Notified the director in writing within seven days of detecting the problem? Yes No N/A RMK# _____

11. When the Permittee returned the EB to service after it was removed from service pursuant to Condition E.4. of the permit, did the Permittee do the following: [Condition E.4.(c)]

a. If the impoundment was removed from service as the result of an actual or imminent dike failure, did the Permittee have the structural integrity of the dike re-certified by a qualified, registered professional engineer, in accordance with OAC rule 3745-56-26(C)? Yes No N/A RMK# _____

- b. If the impoundment was removed from service as the result of a sudden drop in liquid level, did the Permittee ensure that the liner repair was certified by a qualified, registered professional engineer? Yes No N/A RMK#
12. If the EB that was removed from service will not be repaired and put back into service, did the Permittee close the EB in accordance with OAC rule 3745-56-28? [Condition E.4.(d)] Yes No N/A RMK#
13. Does the Permittee inspect the EB weekly and after storms in accordance with the inspection schedule log (G.2. of the Part B application) [Condition E.5.(a)]? Yes No N/A RMK# 3
14. If the EB was out of service for more than six months, prior to returning the impoundment to service, did the Permittee obtain a certification from a qualified, registered professional engineer that certifies that the dike: [Condition E.5.(b)]
- a. Will withstand the stress and pressure exerted by the types/quantities of wastes to be placed into the EB? Yes No N/A RMK#
- b. Will not fail due to scouring or piping, without dependence in any liner system included in the EB construction? Yes No N/A RMK#
15. Did the Permittee notify the director, in writing, within seven days of detecting either a leak in the EB dike or sudden drop in liquid level which is not caused by changes in flows into or out of the EB? [Condition E.6.] Yes No N/A RMK#
16. If the Permittee has closed or is closing the EB, was the closure conducted in accordance with the approved closure plan contained in Appendix I-2 of the permit application? [Condition E.7.] Yes No N/A RMK#

POST-CLOSURE CARE [Former Equalization Basin (FEQB)]

NOTE: *The Permittee must conduct post-closure activities in accordance with the approved post-closure plan at the former equalization basin (FEQB).*

1. Does the Permittee maintain the integrity and effectiveness of the final cover, including making repairs as necessary to correct the effects of settling, subsidence, and erosion? [Condition G.3.(c)(i)] Yes ___ No N/A ___ RMK# 6
2. Does the Permittee prevent run-on and run-off from eroding or otherwise damaging the final cover? [Condition G.3.(c)(ii)] Yes ___ No N/A ___ RMK# 6
3. Does the Permittee comply with the security requirements as specified in the post-closure plan submitted at part of the Part B permit application? (Appendix I-3) [Condition G.3.(e)] Yes No N/A ___ RMK# ___
4. Does the Permittee inspect the components, structures, and equipment of the closed equalization basin in accordance with the inspection schedule in the post-closure plan included in the permit application? [Condition G.4.(a)] Yes No N/A ___ RMK# ___

NOTE: *If the Permittee or any subsequent owner or operator of the land upon which the hazardous waste disposal unit is located, wishes to remove hazardous waste or hazardous waste residues, the liner, if any; or contaminated soils, then he shall request a modification to the post-closure permit in accordance with the applicable requirements in OAC Chapter 3745-50. The Permittee or any subsequent owner or operator of the land shall demonstrate that the removal of hazardous wastes will satisfy the criteria of OAC rule 3745-55-17(C).*

5. Did the Permittee, no later than 60 days after completion of the established post-closure care period for the hazardous waste disposal unit, submit to the director, by registered mail, a certification that post-closure care for the hazardous waste disposal unit was performed in accordance with the specifications in the approved Post-Closure Plan? [Condition G.5.(b)] Yes ___ No N/A RMK# ___

6. Did the Permittee sign the certification described in Question #5 and include a certification by an independent, registered professional engineer? [Condition G.5.(b)] Yes ___ No N/A RMK# ___

NOTE: The Permittee must request a permit change to authorize a change in the approved post-closure plan. This request must be in accordance with applicable requirements of OAC Chapter 3745-50, and must include a copy of the proposed amended post-closure plan for approval by the director. The Permittee shall request a permit change whenever changes in operating plans or facility design affect the approved post-closure plan, there is a change in the expected year of final closure, or other events occur during the active life of the facility that affect the approved post-closure plan. The Permittee must submit a written request for a permit change at least 60 days prior to the proposed change in facility design or operation, or no later than 60 days after an unexpected event has occurred which has affected the post-closure plan.

CORRECTIVE ACTION

1. Has the Permittee submitted the yearly progress report describing the status and effectiveness of the corrective measures? [Condition D.6.] Yes ___ No N/A RMK# ___
2. Has the Permittee identified any new WMUs or releases at the facility? [Condition D.7.] Yes ___ No N/A ___ RMK# ___
- a. If so, did the Permittee follow the steps indicated in Conditions D.7.(a) and (b), D.8., D.9., and D.10? Yes ___ No N/A RMK# ___
3. Has the Permittee changed the land use of the WWTP undergoing corrective action? [See Condition D.5. for list of acceptable and prohibited land uses.] Yes ___ No N/A ___ RMK# ___

LAND DISPOSAL RESTRICTION REQUIREMENTS

PROHIBITION AGAINST DILUTION

1. Does the Permittee dilute a restricted waste or a treatment residue from a restricted waste: [OAC rule 3745-270-03]
- a. As a substitute for adequate treatment to achieve compliance with LDR treatment standards? Yes No N/A ___ RMK# ___
- b. To circumvent the effective date of a prohibition (e.g., to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)? Yes No N/A ___ RMK# ___

- c. To otherwise avoid a prohibition in OAC rules 3745-270-30 through 3745-270-39? Yes No N/A ___ RMK# ___
- d. To otherwise avoid a prohibition imposed by Section 3004 of RCRA? Yes No N/A ___ RMK# ___

NOTE: If the answer to any of the Questions 1(a) through 1(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of OAC rule 3745-270-03.

Dilution of wastes is permissible under some conditions. See OAC rule 3745-270-03(B) (40 CFR 268.3).

WASTE EVALUATION REQUIREMENTS

2. Has the Permittee adequately evaluated all wastes to determine if they are restricted from land disposal? [OAC rule 3745-270-07(A)] Yes No N/A ___ RMK# ___
- a. **For determinations based solely on knowledge of the waste:** Is supporting data used to make this determination being retained on-site? [OAC rule 3745-270-07(A)(6); Condition B.40.(a)] Yes No N/A ___ RMK# ___
- b. **For determinations based upon analytical testing:** Is a copy of waste analysis data being retained on-site? [OAC rule 3745-270-07(A)(6)] Yes No N/A ___ RMK# ___
3. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g., wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [OAC rule 3745-270-07(A)] Yes No N/A ___ RMK# ___
4. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [OAC rule 3745-270-07(A)] Yes No N/A ___ RMK# ___
5. Does the entity generate any listed waste(s) which are restricted from land disposal? If so, Yes No N/A ___ RMK# ___
- a. Do such wastes also exhibit hazardous waste characteristics as identified in OAC rules 3745-51-20 to 3745-51-24? Yes No N/A ___ RMK# ___

- b. For listed wastes which also exhibit a characteristic: Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [OAC rule 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)]

NOTIFICATION/CERTIFICATION

6. **For wastes that do not meet treatment standards:** Yes No N/A ___RMK#___
Has the generator submitted a one-time written notice to the treatment/storage facility receiving the wastes, in writing, that wastes being received do not meet treatment standards? [OAC rule 3745-270-07(A)(2)]

If so, does the notification include the following:

- a. EPA hazardous waste number? [OAC rule 3745-270-07(A)(2)] Yes No N/A ___RMK#___
- b. Appropriate treatment standard for the waste? [OAC rule 3745-270-07(A)(2)] Yes No N/A ___RMK#___
- c. The manifest number associated with the shipment of waste? [OAC rule 3745-270-07(A)(2)] Yes No N/A ___RMK#___
- d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(2)] Yes No N/A ___RMK#___
- e. Applicable wastewater/non-wastewater category [OAC rule 3745-270-07(A)(3)] Yes No N/A ___RMK#___
- f. For hazardous debris, list the contaminants subject to treatment, as described in paragraph (B) of OAC rule 3745-270-45; and an indication that these contaminants are being treated to comply with OAC rule 3745-270-45. Yes ___ No N/A RMK#___

g. For contaminated soil list the constituents subject to treatment as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards.

Yes ___ No N/A RMK# ___

7. **For wastes that meet treatment standards:** Has the generator submitted a one-time written notice and certification to the treatment, storage or disposal facility receiving the wastes stating waste being received meet applicable treatment standards? [OAC rule 3745-270-07(A)(3)]

Yes No N/A ___ RMK# ___

If so, does the notice/certification include the following:

a. EPA hazardous waste number? [OAC rule 3745-270-07(A)(3)]

Yes No N/A ___ RMK# ___

b. The corresponding treatment standards and applicable prohibitions for the waste? [OAC rule 3745-270-07(A)(3)]

Yes No N/A ___ RMK# ___

c. The manifest number associated with the shipment of waste? [OAC rule 3745-270-07(A)(3)]

Yes No N/A ___ RMK# ___

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(3)]

Yes No N/A ___ RMK# ___

e. Is the certification signed by the generator or an authorized representative? [OAC rule 3745-270-07(A)(2)]

Yes No N/A ___ RMK# ___

f. For contaminated soil list the constituents subject to treatment as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards.

Yes No N/A ___ RMK# ___

8. Does the Permittee retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years? [OAC rule 3745-270-07(A)(8)]

Yes No N/A ___ RMK# ___

GROUND WATER MONITORING

1. Has the Permittee conducted semi-annual sampling of their monitoring wells?

Yes No N/A ___ RMK# ___

2. Have they reported the results in the Annual Ground Water Monitoring Report as required by Appendix E-1 of the Part B permit application? [Condition F.7]

Yes No N/A ___ RMK# ___

NOTE: *The permit does not specify the months in which the sampling must occur. The schedule in the past has been sampling in May and November with the Annual Ground Water Report being submitted in February.*

END OF PERMIT CONDITIONS

REMARKS

1. There has been no ownership change from the last inspection. Facility ownership was transferred in 2001 from BP Amoco to Solvay Advanced Polymers.
2. Solvay submitted a waste minimization report on February 1, 2008 as required.
3. Condition B.5 of the permit requires Solvay to follow the inspection schedules found in Appendix G-2 of the approved permit application. Appendix G-2 requires weekly and storm event inspections of the Emergency Basin. These inspections must be recorded on the WWTP inspection log sheet. Since the date of Solvay's last hazardous waste inspection on February 21, 2007 to March 3, 2008, the date of the current hazardous waste inspection, there have been eleven instances where inspections of the basin were done less than weekly. Those eleven

instances are as follows: from May 4, 2007 to May 16, 2007; June 8, 2007 to June 19, 2007; August 31, 2007 to September 10, 2007; September 11, 2007 to September 21; October 1, 2007 to October 9, 2007; November 26, 2007 to December 4, 2007; December 11, 2007 to December 21, 2007; and December 23, 2007 to January 1, 2008; January 1, 2008 to January 15, 2008; January 18, 2008 to January 28, 2008 ; and February 18, 2008 to February 26, 2008.

4. Inspections logs for the Permitted Waste Storage Area indicate that the dike drain was observed to be full of rainwater on July 18, 2007 and that corrective action of pumping the water out was not done until July 25, 2007.
5. Appendix G-2 requires that the permitted storage area be inspected weekly. The weekly inspections are required to be recorded on an inspection log. Since the date of Solvay's last hazardous waste inspection on February 21, 2007 to March 3, 2008, the date of the current hazardous waste inspection, there have been six instances where inspections of the permitted storage area were done less than weekly as documented by the inspection log. Those six instances are as follows: from February 27, 2007 to March 7, 2007; from March 7, 2007 to March 15, 2007; from April 4, 2007 to April 12, 2007; from May 7, 2007 to May 16, 2007; from May 30, 2007 to June 8, 2007; and from July 31, 2007 to August 8, 2007.
6. The final cover of the FEQB had tire ruts, areas of subsidence where water was ponded, a pile of gravel at the northwestern corner and a gravel roadway running north-south on its western side.

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**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.

GENERAL REQUIREMENTS

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

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

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

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 checked="" type="checkbox"/> | No | <input type="checkbox"/> | N/A | <input 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: Yes No N/A

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

At the time of the inspection the snap ring on a 55-gallon drum in <90 day storage area for Building 2 was not closed. The drum was closed by Mark Potochnik during the inspection, returning Solvay to compliance with this rule.

- 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

Solvay inspects all three of their <90 day storage areas on a regular basis, however, during the past year there were four instances when the time between inspections was greater than seven days. Inspections of the <90 day storage areas at Building 2 and in Building 92 did not occur within seven days during the following time periods: from January 31, 2007 to February 8, 2007; from February 27, 2007 to March 7, 2007; from March 20, 2007 to March 29, 2007; and from May 30, 2007 to June 8, 2007. Inspection of the <90 day storage area for the methyl chloride isotainer tank truck exceeded the seven day interval between May 30, 2007 and June 8, 2007.

- 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 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

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. Regenerated 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# ___

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:
 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

LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] **If so:** Yes No N/A ___RMK#___
- 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#___
- b. **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes No N/A ___RMK#___
2. Has the generator determined each Ohio EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2), see Table 1] Yes No N/A ___RMK#___
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#___
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#___

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 exceed treatment standards? [3745-270-07(A)(1)] Yes No N/A ___RMK#___

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 CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non-wastewater.[3745-270-03(B)]*

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

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# ___

NOTIFICATION AND CERTIFICATION REQUIREMENTS

1. If a generators' 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. 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#
3. 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#
4. 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#
5. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so: Yes No N/A RMK# 1
- 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))*

6. 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#

REMARKS

1. Some of the wastewater discharged to the Emergency Basin may be characteristically hazardous for D021 and D002, but OAC 3745-270-04 provides for an exception. See the RCRA permit application Section 3.5.

GENERATORS TREATING HAZARDOUS WASTE

1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40? Yes ___ No N/A ___ RMK# ___
2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)] Yes ___ No N/A RMK# ___
- a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)] Yes ___ No N/A RMK# ___
- b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] Yes ___ No N/A RMK# ___
3. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] Yes ___ No N/A RMK# ___
4. Have the treated wastes met the applicable treatment standards in 3745-270-40? Yes ___ No N/A RMK# ___
- NOTE:** *If the waste is a characteristic waste, which has been treated to render it non hazardous and subsequently sent to a solid waste landfill, proceed to question 7 & 8.*
5. Has the generator sent a notification and certification with the initial shipment of waste?[3745-270-07(A)(5)(c)] Yes ___ No N/A RMK# ___
6. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)] Yes ___ No N/A RMK# ___
7. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following:
- i. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes ___ No N/A RMK# ___
- ii. A description of the waste, including EPA hazardous waste numbers and treatability group, and UHCs? [3745-270-09(D)(1)(b)] Yes ___ No N/A RMK# ___

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

8. Has the process/operation generating the waste or the solid waste landfill facility changed? If so: Yes ___ No ___ N/A RMK# ___
- a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)] Yes ___ No N/A RMK# ___
- b. Has the director been notified of such changes? [3745-270-09(D)] Yes ___ No N/A RMK# ___

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

9. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: Yes ___ No ___ N/A RMK# ___
- a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49(C)] Yes ___ No N/A RMK# ___
10. Does each notification/certification form completed, contain the information found in Table 1? [3745-270-07(A)(3)] Yes ___ No N/A RMK# ___

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

HAZARDOUS DEBRIS

1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)? Yes ___ No ___ N/A RMK# ___
2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.) Yes ___ No ___ N/A RMK# ___
3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so: Yes ___ No ___ N/A RMK# ___
- a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)] Yes ___ No N/A RMK# ___

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

4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so: Yes ___ No ___ N/A RMK# ___
- a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)] Yes ___ No N/A RMK# ___
5. Is the waste a PCB waste under 40 CFR Part 761? If so: Yes ___ No ___ N/A RMK# ___
- a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 270? [3745-270-45(A)(5)] Yes ___ No N/A RMK# ___
6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)] Yes ___ No N/A RMK# ___
7. Does the owner/operator of a treatment facility that claims the debris is excluded under 3745-51-03(F)(1) maintain the following information?
- a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)] Yes ___ No ___ N/A RMK# ___
- b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)] Yes ___ No N/A RMK# ___
- c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)] Yes ___ No N/A RMK# ___
8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F) have the following information? [3745-270-07(D)(3)]
- a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)] Yes ___ No N/A RMK# ___
- b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)] Yes ___ No N/A RMK# ___

c. Technology used from Table 1? [3745-270-07(D)(1)(c)]

Yes ___ No N/A RMK# ___

9. Has the above notification been sent to the director? [3745-270-07(D)(1)]

Yes ___ No N/A RMK# ___

TREATING FACILITIES

1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-14? [3745-270-07(B)]

Yes ___ No N/A RMK# ___

2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)]

Yes ___ No N/A RMK# ___

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

3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07? [3745-270-07(B)(3)]

Yes ___ No N/A RMK# ___

4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so:**

Yes ___ No ___ N/A RMK# ___

a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)]

Yes ___ No N/A RMK# ___

5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-58-30? **If so:**

Yes ___ No ___ N/A RMK# ___

a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)), excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)]

Yes ___ No N/A RMK# ___

b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4) [3745-270-07(B)(6)]

Yes ___ No N/A RMK# ___

c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)]

Yes ___ No N/A RMK# ___

6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)] Yes ___ No N/A RMK# ___
7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-70 have:
- a. Copies of all notices and certifications required in 3745-270? Yes ___ No N/A RMK# ___
- b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49? Yes ___ No N/A RMK# ___
- c. Followed the testing frequency specified in the facilities WAP? Yes ___ No N/A RMK# ___

REMARKS