OhioEPA
State of Ohio Environmental Protection Agency

Northeast District Office

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Bob Taft, Governor
Bruce Johnson, Lieutenant Governor
Joseph P. Koncelik, Director

January 8, 2007

RE: THOMAS STEEL STRIP CORP.
OHD 077 755 213
HWFB # 02 78 0006
GW MONITORING WELLS
RTC-NOTICE OF CONCERNS

Mr. Eric Howland
Thomas Steel Strip Corp.
Delaware Ave., NW
Warren, OH 44485

Dear Mr. Howland:

Thank you for the letter and documentation dated November 20, 2006, pursuant to the concerns cited during our ground water monitoring well inspection at Thomas Steel Strip Corporation (TSSC), located at Delaware Avenue N.W., Warren, Ohio. This Agency considers TSSC as having returned to compliance with the concerns cited in the October 26, 2006, notice of concerns letter.

Failure to list specific deficiencies in this communication does not relieve TSSC from the responsibility of complying with all applicable regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Should you have any questions or concerns, please do no hesitate to call me at (330) 963-1189.

Sincerely,

Gregory Orr
Environmental Specialist
Division of Hazardous Waste Management

GO:ddw

ec: Natalie Oryshkewych, Ohio EPA, DHWM, NEDO
Rich Kurlich, Ohio EPA, DHWM, NEDO
Gregory Orr, Ohio EPA, DHWM, NEDO

RCRA HAZARDOUS WASTE GENERATOR INSPECTION CHECKLIST

Company: THOMAS STEEL STRIP EPA ID#: OHD 077-755-213

Street: DELAWARE AVE., N.W. City: WARREN

County: TRUMBULL State: Ohio Zip: 44485

Mailing Address: _____
(If different from above)

Telephone: 330-841-6189 Fax #: 330-841-7402

Owner/ Operator: SAME
(If different from above)

Street: _____

City: _____ State: Ohio Zip: _____

Inspection Date(s): 6/8/05 Time(s): _____

Inspection Announced? _____ Yes __X__ NO If so, how much advance notice given? _____

	Name	Affiliation	Telephone
Inspectors:	GREG ORR	OHIO EPA	330-963-1200
Facility Representative:	ERIC HOWLAND	TSSC	330-841-6189

Complete All Other Applicable Checklists

Generator Classification	Waste Management Activity
_____ Conditionally Exempt SQG (CESQG)	__X__ Containers
_____ Small Quantity Generator (SQG)	__X__ Tank(s)
__X__ Large Quantity Generator (LQG)	__X__ Land Disposal Requirements (LDR)
_____ No Generation	__X__ Used Oil
	__X__ Universal Waste
	_____ Other

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

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

POLLUTION PREVENTION

Note to the Inspector: This checklist has been developed to help the division in gathering general information about the pollution prevention (P2) practices that the company may have initiated or attempted to initiate. The checklist is also used to:

- Facilitate P2 discussions;
- Identify barriers to P2;
- Define the P2 universe;
- Identify the need for future P2 initiatives;
- Identify partnership opportunities; and
- Link companies with better P2 resources.

As a prelude to completing this checklist the inspector should use the following list of questions as a way to initiate a dialogue concerning P2:

1. Have you tried to reduce the volume of waste (hazardous and nonhazardous) that you generate? YES

2. What is the largest waste stream that you generate? F006 SLUDGE

3. How important would it be to you to eliminate that waste stream? VERY

4. Does your company understand the reduced regulatory burden and cost saving benefits that eliminating or reducing a waste stream can have? YES

5. Could you use better housekeeping practices to reduce the amount of waste that you generate? HOUSEKEEPING IS BEING DONE

If the company responds with one of the answers below, the appropriate box should be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided or in the remarks section.

1. Has the company undertaken any P2 activities to reduce the amount of hazardous waste generated? Yes X No__ N/A ___ RMK#___

   a. ***If so,*** what has the company done to minimize hazardous waste generation?

   - ❑ A change in the process resulting in less waste.
   - ❑ A change in the product resulting in less waste.
   - ❑ Use of fewer and less toxic hazardous raw materials.
   - X Better operations/improved housekeeping.
   - X On-site recycling/reuse of hazardous materials.
   - X Sending waste off-site for recycling/reuse.
   - ❑ Other activities (specify): _____

   b. ***If so,*** what hazardous wastes have been addressed?

   - X Solvents
   - X Paint related wastes
   - ❑ Industrial process wastes (sludges, slags, contaminated waste waters, etc)

- ❑ Contaminated oils/hydraulic fluids
- ❑ Off-spec chemicals
- X Fluorescent light bulbs
- X Used batteries
- X Shop rags
- ❑ Other (specify): _____

c. ***If not,*** why hasn't the company considered P2?

- ❑ The company just never thought about it
- ❑ Lack of information about practical alternatives
- ❑ Lack of capital to make process changes
- ❑ Lack of internal management support
- ❑ The company does not generate enough hazardous waste to consider P2
- ❑ Other reason given (specify): _____

2.	Does the company plan to do P2 activities in the future?	Yes X No ___ N/A ___RMK#___
3.	Would the company be interested in receiving additional information from Ohio EPA about P2?	Yes _X_No___ N/A ___RMK#___
4.	Did you give the company information about P2 during the inspection?	Yes X No___ N/A ___RMK#___
5.	Would the company like a P2 assessment?	Yes___ No___ N/A ___RMK#___

If the company would like a P2 assessment done at their facility, the inspector must give the company representative a copy of the Pollution Prevention Assessments for Hazardous Waste Generators document and discuss it with them.

6.	If the company does not want a P2 assessment, why not?	POSSIBLY

REMARKS

LARGE QUANTITY GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] — Yes X No ❑ N/A ___ RMK#___

2. Has the generator obtained an identification number? [3745-52-12] — Yes X No ❑ N/A ___ RMK#___

3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41] — Yes X No ❑ N/A ___ RMK#___

WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? If so: — Yes___ No X N/A ___ RMK#___

   a. Has the generator notified U.S. EPA of export/import activity? [3745-52-53] — Yes ___ No ❑ N/A X RMK#___

   b. Has the generator complied with special manifest requirements? [3745-52-54] — Yes ___ No ❑ N/A X RMK#___

   c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] — Yes ___ No ❑ N/A X RMK#___

   d. Has an annual report been submitted to U.S. EPA? [3745-52-56] — Yes ___ No ❑ N/A X RMK#___

   e. Are export related documents being maintained on-site? [3745-52-57] — Yes ___ No ❑ N/A X RMK#___

GENERATOR CLOSURE REQUIREMENTS

5. Has the generator closed any <90-day accumulation unit(s) since the date of the last inspection? If so: — Yes___ No X N/A ___ RMK#___

   a. Describe the unit(s) which the generator has closed.

b.	Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	Yes ___ No ❑ N/A _X_RMK#___
c.	Please provide a description of the documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standards.	NA

NOTE: ***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]***

REMARKS

MANIFEST REQUIREMENTS

You must start this part of the inspection by telling the company representative about the certification statement on the hazardous waste manifest using the following question and statement:

Are you aware of what the statement that you sign on the manifest says? Yes X No___

If the answer is no, show them what the statement says using a signed manifest.

NOTE: ***While the statement is a certification that a P2 strategy is in place, signing the statement does not establish any legal obligations with which the company must comply. In other words, there is no violation of the hazardous waste rules if they sign the manifest and they don't have a program in place.***

1. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] — Yes X No ❑ N/A ___RMK#___

2. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] — Yes X No ❑ N/A ___RMK#___

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)]***

3. Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)] — Yes X No ❑ N/A ___RMK#___

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)]***.

4. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: — Yes___ No X N/A ___RMK#___

   a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] — Yes ___ No ❑ N/A X RMK#___

5. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)] — Yes X No ❑ N/A ___RMK#___

6. Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not: — Yes X No___ N/A ___RMK#___

a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)] — Yes ___ No ❑ N/A X RMK#___

b. If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] — Yes ___ No ❑ N/A X RMK#___

7. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] — Yes X No ❑ N/A ___RMK#___

REMARKS

PERSONNEL TRAINING

1. Does the generator keep records required by 3745-65-16(D) including:

   a. Job titles, as they relate to hazardous waste management, and the name of each employee filling each job? Yes _X_ No ❑ N/A ___RMK#___

   b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position? Yes _X_ No ❑ N/A ___RMK#___

   c. Type and amount of both introductory and continuing training to be given to each person filling a position? Yes_X_ No ❑ N/A ___RMK#___

   d. Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)? Yes_X_ No ❑ N/A ___RMK#___

NOTE: ***If the facility's business practices precludes written job titles/descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be used to document that all necessary employees have been trained.***

2. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to their positions? [3745-65-16(A)(2) Yes _X_ No ❑ N/A ___RMK#___

3. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]

   a. Emergency procedures? Yes_X_ No ❑ N/A ___RMK#___

   b. Emergency equipment? Yes _X_ No ❑ N/A ___RMK#___

   c. Emergency systems? Yes_X_ No ❑ N/A ___RMK#___

4. Does emergency training described in 3(a), (b) and (c) above include, *where applicable*: [3745-65-16(A)(3)(a-f)

a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? Yes _X_ No ❑ N/A ___RMK#___

b. Key parameters for automatic waste feed cut-off systems? Yes _X_ No ❑ N/A ___RMK#___

c. Communication or alarm system? Yes _X_ No ❑ N/A ___RMK#___

d. Response procedures for fire/explosions? Yes _X_ No ❑ N/A ___RMK#___

e. Response to groundwater contamination incidents? Yes _X_ No ❑ N/A ___RMK#___

f. Shutdown procedures? Yes _X_ No ❑ N/A ___RMK#___

5. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes _X_ No ❑ N/A ___RMK#___

6. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes _X_ No ❑ N/A ___RMK#___

7. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes _X_ No ❑ N/A ___RMK#___

8. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)] Yes _X_ No ❑ N/A ___RMK#___

9. 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 _X_ No ❑ N/A ___RMK#___

10. ***Optional***: 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 manifests, etc.

Job Performed	**Name of Employee**	**Date(s)Trained**

REMARKS

CONTINGENCY PLAN

1. Does the generator have a contingency plan which describes the following: [3745-65-52(A) through (F)]

   a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? Yes X No ❑ N/A ___RMK#___

   b. Arrangements/agreements with emergency authorities? [3745-65-37] Yes X No ❑ N/A ___RMK#___

   c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? Yes X No ❑ N/A ___RMK#___

   d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? Yes X No ❑ N/A ___RMK#___

   e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary? Yes X No ❑ N/A ___RMK#___

NOTE: ***If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 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)]***

2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes X No ❑ N/A ___RMK#___

3. 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 X No ❑ N/A ___RMK#___

4. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] Yes X No ❑ N/A ___RMK#___

EMERGENCY COORDINATOR

5. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes X No ❑ N/A ___RMK#___

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***

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes___ No_X_ N/A ___RMK#___

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

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

   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 _X_RMK#___

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.***

REMARKS

PREPAREDNESS AND PREVENTION [3745-52-34(A)(4)]

1. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] — Yes _X_ No ❑ N/A ___RMK#___

2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]

   a. Internal alarm system? — Yes_X_ No ❑ N/A ___RMK#___

   b. Emergency communication device? — Yes _X_ No ❑ N/A ___RMK#___

   c. Portable fire control, spill control and decon equipment? — Yes_X_ No ❑ N/A ___RMK#___

   d. Water of adequate volume/pressure? — Yes _X_ No ❑ N/A ___RMK#___ According to TSSC

3. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] — Yes_X_ No ❑ N/A ___RMK#___

4. Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33] — Yes _X_ No ❑ N/A ___RMK#___

5. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32)*? [3745-65-34] — Yes _X_ No ❑ N/A ___RMK#___

6. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] — Yes_X_ No ❑ N/A ___RMK#___

7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] — Yes _X_ No ❑ N/A ___RMK#___

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

REMARKS

GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)] — Yes ❑ No X N/A ___ RMK#___

SATELLITE ACCUMULATION AREA REQUIREMENTS [3745-52-34(C)(1)]

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

   a. Are at or near a point of generation? — Yes ___ No ❑ N/A X RMK#___

   b. Are under the control of the operator of the process generating the waste? — Yes ___ No ❑ N/A X RMK#___

   c. Do not exceed a total of 55 gallons of hazardous waste? — Yes___ No___ N/A X RMK#___

   d Do not exceed one quart of acutely hazardous waste at any one time? — Yes ___ No ❑ N/A X RMK#___

   e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? — Yes ___ No ❑ N/A X RMK#___

NOTE: ***The 55 gallon limit applies to the area itself, and not to each individual waste stream accumulated in the area. The inspector should refer to Ohio EPA's November 1994 Guidance on the Location of Satellite Accumulation Areas.***

3. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so: — Yes___ No X N/A ___RMK#___

   a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? — Yes ___ No ❑ N/A X RMK#___

   b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? — Yes ___ No ❑ N/A X RMK#___

USE AND MANAGEMENT OF CONTAINERS

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

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

6. Are hazardous wastes stored in containers which are:

   a. Closed (except when adding/removing wastes)? [3745-66-73(A)] — Yes X No ❑ N/A ___RMK#___

   b. In good condition? [3745-66-71] — Yes _X_ No ❑ N/A ___RMK#___

   c. Compatible with wastes stored in them? [3745-66-72] — Yes _X_ No ❑ N/A ___RMK#___

   d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] — Yes X No ❑ N/A ___RMK#___

7. Is the container accumulation area(s) inspected weekly? [3745-66-74] (*Note location in general information section of checklist)* — Yes _X_ No ❑ N/A ___RMK#___

   a. Are inspections recorded in a log or summary? [3745-66-74] — Yes X No ❑ N/A ___RMK#___

8. For ignitable and/or reactive hazardous waste(s):

   a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] — Yes _X_ No ❑ N/A ___RMK#___

   b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] — Yes X No ❑ N/A ___RMK#___

PRE-TRANSPORT REQUIREMENTS

9. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] — Yes X No ❑ N/A ___RMK#___

10. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] — Yes _X_ No ❑ N/A ___RMK#___

11. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] — Yes X No ❑ N/A ___RMK#___

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REMARKS

TANK SYSTEM REQUIREMENTS (OAC 3745-66-91 TO 3745-66-100)

(Please refer to the rules before or while completing this checklist.)

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

1. **For an existing or new tank system(s)** has secondary containment been provided? [3745-66-93(A)(1) to (A)(5)] Yes X No___ N/A ___RMK#___

NOTES:

A. Secondary containment must be provided for all new tank systems or components, prior to their being put into service. [3745-66-93(A)(1)]

*B. For an existing tank system(s) of **known and documentable age** secondary containment is required to be provided within two years after January 12, 1987, or when the tank system has reached 15 years of age, whichever came later. [3745-66-93(A)(3)]*

*C. Secondary containment is required for all existing tanks for which the **age cannot be documented**. The tanks were required to have secondary containment within eight years of January 12, 1987 or when the facility turned 15 years of age, whichever came later. [3745-66-93(A)4)]*

D. Tank systems that store/treat materials that become hazardous waste after January 12, 1987, must have secondary containment required within the time intervals in OAC 3745-66-93(A)(1) to (A)(4). The date the material became a hazardous waste must be used in place of January 12, 1987. [3745-66-93(A)(5)]

E. If the tank system has no secondary containment, or a variance from secondary containment requirements has been granted, skip to the middle of page 6 of this Tank Systems Checklist; (Tank Systems without secondary containment) .

2. Is the secondary containment one of the following:

a. An **External Liner** [3745-66-93(E)(1)(a) - (1)(f)] If so, Yes___ No___ N/A _X__RMK#___

i. Is liner designed or operated to contain 100% of the capacity of the largest tank? Yes ___ No ❑ N/A _X__RMK#___

ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? Yes ___ No ❑ N/A _X__RMK#___

iii. Is liner free of cracks and gaps? Yes ___ No ❑ N/A _X__RMK#___

	iv.	Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release?	Yes ___ No ❑ N/A _X_ RMK#___
	v.	Are chemically resistant water stops in place at all joints? (*concrete liners only*)	Yes ___ No ❑ N/A _X_ RMK#___
	vi.	Is there a compatible interior coating or lining to prevent migration of waste into the concrete? *(concrete liners only)*	Yes ___ No ❑ N/A _X_ RMK#___
b.	**Vault System?** [3745-66-93(E)(2)(a) - (2)(f)] If so,		Yes___ No_X_ N/A ___ RMK#___
	i.	Is vault system designed to contain 100% of the capacity in the largest tank?	Yes ___ No N/A _X_ RMK#___
	ii.	Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	Yes ___ No N/A _X_ RMK#___
	iii.	Are chemically resistant water stops in place at all joints?	Yes ___ No ❑ N/A _X_ RMK#___
	iv.	Is there a compatible interior coating to prevent migration into the concrete?	Yes ___ No ❑ N/A _X_ RMK#___
	v.	For **ignitable or reactive waste**: Is the vault system provided with means to prevent against the formation or ignition of vapors?	Yes ___ No ❑ N/A _X_ RMK#___
	vi	Is vault system provided with an exterior moisture barrier?	Yes ___ No ❑ N/A _X_ RMK#___
c.	**Double-Walled Tank?** [3745-66-93(E)(3)(a) - (3)(c)] If so,		Yes___ No___ N/A _X_ RMK#___
	i.	Is double-walled tank designed as an integral structure to contain any release from the inner tank?	Yes ___ No ❑ N/A _X_ RMK#___
	ii.	**If metal**, are the primary tank interior and outer shell exterior surfaces protected from corrosion?	Yes ___ No ❑ N/A _X_ RMK#___
	iii.	Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time?	Yes ___ No ❑ N/A _X_ RMK#___

3. Is the secondary containment system for the tank(s) an equivalent device as described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D)(E)] — Yes___ No___ N/A _X_ RMK#___

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

4. Has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulated liquids? [3745-66-93(B)] — Yes _X_ No ❑ N/A ___ RMK#___

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

   a. Constructed or lined with compatible materials of sufficient strength to prevent failure? — Yes _X_ No ❑ N/A ___ RMK#___

   b. Placed on a foundation or base capable of providing support? — Yes _X_ No ❑ N/A ___ RMK#___

   c. Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time? — Yes _X_ No ❑ N/A ___ RMK#___

   d. Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? — Yes _X_ No ❑ N/A ___ RMK#___

   e. Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner? — Yes _X_ No ❑ N/A ___ RMK#___

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

6. Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)? ***If not***, is the ancillary equipment: — Yes_X_ No___ N/A ___ RMK#___

   a. Inspected daily? **AND**; — Yes _X_ No ❑ N/A ___ RMK#___

   b. Is ancillary equipment one of the following:

      i. Above ground piping (exclusive of flanges, joints, valves and connections)? — Yes _X_ No ❑ N/A ___ RMK#___

      ii. Welded flanges, welded joints and/or welded connections? — Yes _X_ No ❑ N/A ___ RMK#___

iii. Sealless or magnetic coupling pumps and/or sealless valves? Yes _X_ No ❑ N/A ___RMK#___

iv. Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown, and/or loss of pressure-actuated shut-off devices)? Yes _X_ No ❑ N/A ___RMK#___

REMARKS

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

1. Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-66-92(A)] Yes _X_ No N/A ___RMK#___

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

   a. Certification by an independent, registered, professional engineer? Yes _X_ No N/A ___RMK#___

   b. Consideration of the design standards of the system? Yes _X_ No N/A ___RMK#___

   c. Consideration of the hazardous characteristics of the waste(s)? Yes _X_ No N/A ___RMK#___

   d. An evaluation by a corrosion expert (*if the external system/components are metal)*? Yes _X_ No N/A ___RMK#___

   e. A determination of design and operational measures that will be needed to protect the tank system from potential damage *(for underground tank components)*? Yes _X_ No N/A ___RMK#___

   f. Design considerations to ensure that the tank foundations will maintain the load of a full tank? Yes _X_ No N/A ___RMK#___

   g. Design considerations for anchoring the unit to prevent floatation *(for tanks situated in a seismic fault zone or saturated zone)*? Yes _X_ No N/A ___RMK#___

h. Design considerations to ensure that the tank system will withstand the effects of frost heave *(for underground tank systems)*? Yes _X_ No N/A ___RMK#___

3. Are there written statements by those person who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)] Yes _X_ No N/A ___RMK#___

Do the written statements address all of the following:

a. Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)] Yes _X_ No N/A ___RMK#___

b. Statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)] Yes _X_ No N/A ___RMK#___

c. Proper backfilling? [3745-66-92(C)] Yes _X_ No N/A ___RMK#___

d. Tightness test; if the tank was found not to be tight, does the statement indicate that proper repairs were made? [3745-66-92(D)] Yes _X_ No N/A ___RMK#___

e. Proper support and protection of ancillary equipment? [3745-66-92(E)] Yes _X_ No N/A ___RMK#___

f. Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)] Yes _X_ No N/A ___RMK#___

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

1. For existing tank system, without secondary containment: Is there a written assessment on file which includes the following considerations: [3745-66-91(A)(B)] Yes ___ No ❑ N/A _X_ RMK#___

a. Design standards? [3745-66-91(B)(1)] Yes ___ No ❑ N/A _X_ RMK#___

b. The characteristics of hazardous waste(s) that have been or will be handled? [3745-66-91(B)(2)] Yes ___ No ❑ N/A _X_ RMK#___

c. Corrosion protection measures? [3745-66-91(B)(3)] Yes ___ No ❑ N/A X RMK#___

d. The age of the tank system has been estimated or documented? [3745-66-91(B)(4)] Yes ___ No ❑ N/A _X_ RMK#___

e. A leak test has been conducted? *(For non-enterable underground tanks)* [3745-66-91(B)(5)(a)] — Yes ___ No ❑ N/A _X_ RMK#___

f. A leak test or an internal inspection by qualified P.E. has been conducted? *(For <u>other than</u> non-enterable underground tanks and for ancillary equipment)* [3745-66-91(B)(5)(b)] — Yes ___ No ❑ N/A _X_ RMK#___

g. Is assessment certified by an independent, registered P.E.? [3745-66-91(A)] — Yes ___ No ❑ N/A _X_ RMK#___

2. Have the tests specified in 1e and 1f been conducted annually on the tanks and ancillary equipment until secondary containment is provided? [3745-66-93(I)] ***If so,*** — Yes ___ No ❑ N/A _X_ RMK#___

a. Have tests been certified by an independent, registered P.E.? — Yes ___ No ❑ N/A _X_ RMK#___

3. For tanks without secondary containment used to store or treat wastes which become hazardous wastes after July 14, 1986, has the assessment been completed within 12 months of the date the waste became a hazardous waste? [3745-66-91(C)] — Yes ___ No ❑ N/A _X_ RMK#___

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

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

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

b. Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)? [3745-66-94(B)] — Yes _X_ No ❑ N/A ___ RMK#___

c. If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96? [3745-66-94(C)] — Yes ___ No ❑ N/A _X_ RMK#___

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

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

a. Spill control equipment (daily)? [3745-66-95(A)(1)] Yes X No ❑ N/A ___RMK#___

b. Above ground portion of tank (daily)? [3745-66-95(A)(2)] Yes X No ❑ N/A ___RMK#___

c. Data from leak detection equipment (daily)? [3745-66-95(A)(3)] Yes X No ❑ N/A ___RMK#___

d. Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste (daily)? [3745-66-95(A)(4)] Yes X No ❑ N/A ___RMK#___

e. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(B)(1)] Yes X No ❑ N/A ___RMK#___

f. Where applicable, all sources of impressed current at least bi-monthly? [3745-66-95(B)(2)] Yes X No ❑ N/A ___RMK#___

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

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

   a. Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-65-17(B)? [3745-66-98(A)(1)]; **OR** Yes___ No___ N/A X RMK#___

   b. Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A)(2)]; **OR** Yes___ No___ N/A X RMK#___

   c. The tank is used solely for emergencies? [3745-66-98(A)(3)] Yes___ No___ N/A X RMK#___

2. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (1996)? [3745-66-98(B)] Yes ___ No ❑ N/A X RMK#___

3. Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material? [3745-66-99] — Yes___ No___ N/A _X_ RMK#___

   a. ***If so,*** have the requirements of 3745-65-17(B) been met? — Yes ___ No ❑ N/A _X_ RMK#___

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

1. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-100] — Yes___ No___ N/A_X_ RMK#___

   a. Conducted waste analysis and trial treatment or storage tests? [3745-66-100(A)]; OR — Yes___ No___ N/A_X_ RMK#___

   b. Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-100(B)] — Yes___ No___ N/A_X_ RMK#___

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

1. Has there been a leak or spill from any tank system or has any tank system been found unfit for use? ***If so***, did the o/o: — Yes___ No_X_ N/A ___RMK#___

   a. Immediately cease flow of material into tank and investigate the cause of the release? [3745-66-96(A)] — Yes ___ No ❑ N/A _X_ RMK#___

   b. Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time? [3745-66-96(B)(1)] — Yes ___ No ❑ N/A _X_ RMK#___

   c. Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment? [3745-66-96(B)(2)] — Yes ___ No ❑ N/A _X_ RMK#___

   d. Immediately conduct a visual inspection of the release? [3745-66-96(C)] — Yes ___ No ❑ N/A _X_ RMK#___

   e. Prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C)(1)] — Yes ___ No ❑ N/A _X_ RMK#___

f. Properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)(2)] — Yes ___ No ❑ N/A _X_ RMK#___

g. Report the release to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)(2)] — Yes ___ No ❑ N/A _X_ RMK#___

h. Submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)] — Yes ___ No ❑ N/A _X_ RMK#___

i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)] — Yes ___ No ❑ N/A _X_ RMK#___

j. For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)] — Yes ___ No ❑ N/A _X_ RMK#___

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

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

   a. Was a copy of the certification submitted to the director within seven days after returning the system to use? [3745-66-96(F)] — Yes ___ No ❑ N/A _X_ RMK#___

3. If the o/o was unable to repair and return the unit to service as described in 1.a through 1.e, was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)] — Yes ___ No ❑ N/A _X_ RMK#___

4. Does the o/o have a tank system **with a variance from secondary containment** from which a release has occurred but <u>has not</u> migrated beyond the zone of engineering control? **If so,** — Yes___ No X___ N/A ___ RMK#___

   a. Has the o/o complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G)(3)] — Yes ___ No ❑ N/A _X_ RMK#___

b. If soils cannot be contaminated/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)] — Yes ___ No ❑ N/A _X_ RMK#___

5. Does the o/o have a tank system **with a variance from secondary containment** from which a release occurred and has migrated from the zone of engineering control? **If so,** — Yes___ No___ N/A X___ RMK#___

a. Has the o/o complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)] — Yes ___ No ❑ N/A _X_ RMK#___

b. If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(4)] — Yes ___ No ❑ N/A _X_ RMK#___

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REMARKS

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

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

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] — Yes X 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 X 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 X 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 X No ❑ N/A ___RMK#___

5. Does the SQUWH conduct any of the following activities:

   a. Sort batteries by type? — Yes X No___ N/A ___RMK#___

   b. Mix battery types in one container? — Yes___ No X N/A ___RMK#___

   c. Discharge batteries to remove the electric charge? — Yes___ No X N/A ___RMK#___

   d. Regenerated used batteries? — Yes___ No X N/A ___RMK#___

   e. Disassemble them into individual batteries or cells? — Yes___ No X N/A ___RMK#___

f. Remove batteries from consumer products? Yes__ No X__ N/A ___RMK#___

g. Remove the electrolyte from the battery? Yes___ No X__ 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 X__ N/A ___RMK#___

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

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

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

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

UNIVERSAL WASTE LAMPS

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] Yes X__ No ❑ N/A ___RMK#___

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

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

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

ACCUMULATION TIME

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes X No___ N/A ___RMK#___

    a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes ___ No ❑ N/A X RMK#___

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

12. Is the length of time the universal waste is stored documented by **one** of the following: [3745-273-15(C)] Yes X No ❑ N/A ___RMK#___

    a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes X No___ N/A ___RMK#___

    b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes___ No X N/A ___RMK#___

    c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes___ No X N/A ___RMK#___

d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes___ No_X__ N/A ___RMK#___

e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes___ No_X__ N/A ___RMK#___

f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes___ No_X__ 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 _X__ No ❑ N/A ___RMK#___

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes_X__ No ❑ N/A ___RMK#___

15. Is the material released characterized? [3745-273-17(B)] Yes _X__ 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 _X__ No ❑ N/A ___RMK#___

OFF-SITE SHIPMENTS

NOTE: ***If a SQUWH self-transports 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 _X__ 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 X 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 X 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 <u>one of the following</u>:

    a. Receive the waste back? [3745-273-18(E)(1)] — Yes X No___ N/A ___ RMK#___

    b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] — Yes X 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 <u>one of the following</u>: — Yes X No ❑ N/A ___ RMK#___

    a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] — Yes X 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 X 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 X 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 X RMK#___

<u>EXPORTS</u>

24. Is waste being sent to a foreign destination? If so: — Yes___ No___ N/A X 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 X 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 _X_ 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 _X_ RMK#___

REMARKS

USED OIL INSPECTION CHECKLIST (Short Version)

Company: THOMAS STEEL STRIP EPA I.D.: _____

Street: _____ City: _____

County: _____ State: Ohio Zip: _____

Mailing Address: _____
(IF DIFFERENT FROM ABOVE)

Telephone: _____ Fax: _____

Owner/ Operator: _____
(IF DIFFERENT FROM ABOVE)

Street: _____

City: _____ State: _____ Zip: _____

Inspection Date(s): 05/17/2007 Time(s): _____

Inspection announced? Yes _____ No _____ If so, how much advance notice given? _____

	Name	**Affiliation**	**Telephone**
Inspectors:			
Facility Rep(s):			

USED OIL MANAGEMENT ACTIVITY

_X_ Generator/Collection Center/Aggregation	____ Marketer
____ Transporter/Transfer Facility	____ Off-Spec Burner
____ Processor/Re-Refiner	____ Other (specify)
____ No Generation	

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

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: — Yes__No X_ N/A ___RMK#___

   Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 or 3745-65 to 3745-69? [3745-279-12(A)] — Yes ___ No ❑ N/A _X_RMK#___

2. Is used oil being used as a dust suppressant? [3745-279-12(B)] — Yes ❑ No ____ N/A X RMK#___

3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? — Yes ___ No ❑ N/A _X_RMK#___

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] — Yes ___ No X N/A ___RMK#___

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 _X_RMK#___

6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 or 3745-65 to 3745-69? [3745-279-22(A)] — Yes X No ❑ N/A ___RMK#___

7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] — Yes X No ❑ N/A ___RMK#___

8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] — Yes _X_ No ❑ N/A ___RMK#___

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

   a. Stopped the release? — Yes _X_ No ❑ N/A ___RMK#___

   b. Contained the release? — Yes X No ❑ N/A ___RMK#___

   c. Cleaned up and properly managed the used oil and other materials? — Yes _X_ No ❑ N/A ___RMK#___

d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? — Yes X No ❑ N/A ___ RMK#___

10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: — Yes__ No X N/A ___ RMK#__

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 X RMK#___

b. Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour? — Yes ___ No ❑ N/A X RMK#___

c. Are the combustion gases from heater vented to the ambient air? — Yes ___ No ❑ N/A X RMK#___

11. Does the generator have the used oil hauled only by transporters that have obtained an EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] — Yes X No ❑ N/A ___ RMK#___

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] — Yes ___ No ❑ N/A X RMK#___

13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] — Yes ___ No ❑ N/A X RMK#___

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 X RMK#___

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] — Yes X No ❑ N/A ___ RMK#___

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REMARKS