



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

FILE COPY

September 29, 2011

Ms. Susan Sevy
Clean Harbors Recycling Services of Ohio, LLC
Hebron Recycle Center
581 Milliken Drive SE
Hebron, OH 43025

**Re: Clean Harbors Recycling Services of Ohio, LLC
Hebron Recycle Center
TSD/LQG
U.S. EPA ID#: OHD980587364/ Ohio ID#: 01-45-0518
Licking County, CDO
NOV**

Dear Ms. Sevy:

On September 20, 2011, Randy Sheldon and I inspected the Clean Harbors Recycling Services of Ohio, LLC (Clean Harbors) facility in Hebron, Ohio, to determine Clean Harbors' compliance with Ohio's hazardous waste laws and rules as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). The facility was also inspected for compliance with the terms and conditions of its hazardous waste installation and operations permit renewal issued on June 17, 2005, as modified. Monté Londot assisted us with our inspection, which included a review of company operations and written documentation.

At the time of the inspection, Clean Harbors was operating as a permitted hazardous waste treatment and storage facility, a large quantity generator (LQG) of hazardous waste, and a small quantity handler of universal waste at this location. During the inspection, we found the following violation of Ohio's hazardous waste rules. In order to correct this violation, you must do the following and send me the required information **within 30 days** of your receipt of this letter:

OAC Rule 3745-52-42(A)(2), Exception report: A LQG of hazardous waste shall submit an exception report to the Ohio EPA if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.

During the inspection, we noted that one load of hazardous waste (Manifest Tracking Number: 003417788FLE) was accepted by the initial transporter on March 11, 2011, and the manifest was signed by the designated facility (Essroc

Materials Inc.) on June 3, 2011. Clean Harbors did not file an exception report with Ohio EPA for this shipment. Likewise, three loads of hazardous waste (Manifest Tracking Numbers: 003417787FLE, 003417789FLE, and 003417790FLE) were accepted by the initial transporter on March 14, 2011, and the manifests were signed by the designated facility (Essroc Materials Inc.) on June 3, 2011. Clean Harbors did not file exception reports with Ohio EPA for these shipments.

- To abate this violation, Clean Harbors must submit exception reports for the above noted hazardous waste shipments. The exception reports must include a legible copy of the manifest for which the generator does not have confirmation of delivery; and a cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts. (See attached copy of OAC Rule 3745-52-42)

In addition, please submit a description of what steps Clean Harbors will take to ensure that exception reports are submitted to Ohio EPA within the appropriate time frame (within 45 days of the date the waste was accepted by the initial transporter) in the future.

Please submit this information to me **within 30 days** of your receipt of this letter.

General Comments

1. As discussed during the inspection, Clean Harbors recently removed the two day tanks from the cooker room. Even though, these tanks are not permitted tanks, please submit a Class 1 permit modification to update any facility diagrams that may need to be revised as a result of their removal. For example, Exhibit No. 45A: Solids Handling System Process Flow Diagram (Drawing No. 90-64200-118) may need to be revised.
2. As discussed during the inspection, please ensure that the Clean Harbors bar-coded labels accurately reflect the waste information contained on the Waste Material Profile Sheet. For example, a drum of perc still bottoms was labeled as "Hazardous Waste" and Clean Harbors Profile No. CH494606 states that it is indeed hazardous. However, the bar-coded label printed out the words "Nonhazardous Waste." In addition, two nonhazardous drums had the same profile number (CH340238), yet one bar-coded label classified the waste as "Debris", while the other classified the waste as "Hydrocarbon." In order to accurately identify wastes in the permitted container storage areas, it is important to resolve these discrepancies.

If you would like a free, non-regulatory on-site pollution prevention assessment or if you would like more information about pollution prevention, please contact Ohio EPA's

Ms. Susan Sevy
Clean Harbors Recycling Services of Ohio, LLC
Hebron Recycle Center
Page 3 of 3

Office of Compliance Assistance and Pollution Prevention at (800) 329-7518 or visit the following web address: <http://www.epa.ohio.gov/ocapp/>.

Enclosed is a copy of the checklists that we completed as a result of the inspection. You can find Ohio's hazardous waste rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>.

Should you have any questions, please feel free to call me at (614) 728-3887.

Sincerely,



Melissa M. Storch
Environmental Specialist
Division of Materials and Waste Management
Central District Office

Enclosure

c: Randy Sheldon, DMWM/CDO
CDO File

MMS/rsm Ch.NOV.Sep12011

NOTICE:

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

3745-52-42 Exception report.

(A)

- (1) A generator of greater than one thousand kilograms of hazardous waste in a calendar month who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within thirty-five days of the date the waste was accepted by the initial transporter shall contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste.
- (2) A generator of greater than one thousand kilograms of hazardous waste in a calendar month shall submit an exception report to the Ohio EPA if he has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within forty-five days of the date the waste was accepted by the initial transporter. The exception report shall include:
 - (a) A legible copy of the manifest for which the generator does not have confirmation of delivery; and
 - (b) A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts.

(B) A generator of greater than one hundred kilograms but less than one thousand kilograms of hazardous waste in a calendar month who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within sixty days of the date the waste was accepted by the initial transporter must submit a legible copy of the manifest, with some indication that the generator has not received confirmation of delivery, to the Ohio EPA.

[Note: The submission to Ohio EPA need only be a legible handwritten or typed note on the manifest itself, or on an attached sheet of paper, stating that the return copy was not received.]

Effective: 02/11/1992
119.032 review dates: Exempt
Promulgated under: 119.03
Statutory authority: 3734.12, 6111.05
Rule amplifies: 3734.12, 6111.05
Prior effective dates: 07/27/1980, 04/15/1981

Completed verification forms required to be submitted to CO should be e-mailed to brad.hauser@epa.state.oh.us.

| | | |
|--|---|--|
| Site EPA ID No. | EPA ID Number: OHD980587364 | |
| Site Name | Name: Clean Harbors Recycling Services of Ohio, LLC | Website: www.cleanharbors.com (Optional) |
| Site Location Information | Street Address: 581 Milliken Drive SE | |
| | City, Town, or Village: Hebron | State: OH |
| | County Name: Licking | Zip Code: 43025 |
| Site Land Type (check only one) | <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other | |
| NAICS code(s) www.census.gov/epcd/www/naics.html | 562920 | |

| | | | |
|--|--|--------------|-------------------------|
| Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address | First Name: Susan | MI: J | Last Name: Sevy |
| | Title: Environmental Compliance Manager | | |
| | Phone Number: 216-857-2227 (mobile) | | Phone Number Extension: |
| | E-Mail Address: sevys@cleanharbors.com | | |
| | Fax Number: 740-928-1347 | | Fax Number Extension: |
| | Street or P.O. Box: | | |
| City, Town or Village: | | | |
| State: | | Zip Code: | |

| | | | | |
|---|---|---|---|------------------------|
| Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page | Name of Site's Legal Owner: Clean Harbors Recycling Services of Ohio, LLC | | Date Became Owner (mm/dd/yyyy): 03/21/2008 | |
| | Owner Type: | <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other | | |
| | Street or P.O. Box: 581 Milliken Drive SE | | | |
| | City, Town or Village: Hebron | | Owner Phone #: 740-929-3532 | |
| | State: OH | | Country: USA | Zip Code: 43025 |
| | Name of Site's Operator: Clean Harbors Recycling Services of Ohio, LLC | | Date Became Operator (mm/dd/yyyy): 03/21/2008 | |
| | Operator Type: | <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other | | |
| | Street or P.O. Box: 581 Milliken Drive SE | | | |
| | City, Town or Village: Hebron | | Operator Phone #: 740-929-3532 | |
| | State: OH | | Country: USA | Zip Code: 43025 |

| | |
|--------------------------|---|
| VIOLATIONS CITED? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
|--------------------------|---|

TYPE OF HANDLER - MARK "X" AS APPROPRIATE

| | | |
|---|--|--|
| <input type="checkbox"/> Not a HW Generator | <input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 | <input checked="" type="checkbox"/> Large Quantity Generator (LQG) |
| | <input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment. | <input type="checkbox"/> Small Quantity Generator (SQG) |
| | | <input type="checkbox"/> Conditionally Exempt Small Quantity Generator |
| | | <input checked="" type="checkbox"/> U.S. Importer of Hazardous Waste |
| | | <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator |

| | |
|--|--|
| TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES) | |
| <input checked="" type="checkbox"/> Hazardous Waste Transporter | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace |
| <input type="checkbox"/> Hazardous Waste Transfer Facility | <input type="checkbox"/> Small Quantity On-Site Burner Exemption |
| <input checked="" type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input checked="" type="checkbox"/> Recycler of Hazardous Waste | <input type="checkbox"/> Underground Injection Control Facility |
| <input type="checkbox"/> 72-Hour Recycler | <input checked="" type="checkbox"/> Receives Hazardous Waste from Off-site |

| | |
|--|---|
| UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY)) | |
| <input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste | <input type="checkbox"/> Destination Facility for Universal Waste |
| <input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more) | |

| |
|---|
| CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES |
| <input type="checkbox"/> Batteries |
| <input type="checkbox"/> Pesticides |
| <input type="checkbox"/> Mercury containing equipment |
| <input checked="" type="checkbox"/> Lamps |

| |
|--|
| USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S)) |
| <input checked="" type="checkbox"/> Used Oil Generator |
| <input checked="" type="checkbox"/> Used Oil Transporter |
| <input type="checkbox"/> Used Oil Transfer Facility |
| <input type="checkbox"/> Used Oil Processor |
| <input type="checkbox"/> Used Oil Re-refiner |
| <input type="checkbox"/> Off-Specification Used Oil Burner |
| <input type="checkbox"/> Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil |
| <input type="checkbox"/> Used Oil Fuel Marketer who first claims the Used Oil meets the specifications |

Eligible Academic Entities with Laboratories: Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

| |
|---|
| <input type="checkbox"/> College or University |
| <input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university |
| <input type="checkbox"/> Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university |

Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U1.12). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRA Info source record, you do not need to list them. Instead just indicate the date of the most recent source record.

see Part A

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

| | | | | |
|------------|---|--|--------------------------------------|---|
| Announced | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Additional Facility Representatives: | Monte Londot, Facility General Manager |
| Tanks | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | | |
| Containers | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | | |

| | | |
|--------------------------|-------------------------|--|
| Name of Inspector(s) | Name of Inspector(s) | Date of Inspection/Time (mm/dd/yyyy) (hh:mm) |
| Melissa Storch, DMWM/CDO | Randy Sheldon, DMWM/CDO | 9/20/2011 9:45am |

Comments:

PROCESS DESCRIPTION SECTION

Give a general process description (include all processes at the facility)

At the Hebron Recycle Center, Clean Harbors Recycling Services of Ohio, LLC (Clean Harbors) recycles a variety of spent solvents and some solvent-contaminated wastewaters for beneficial reuse/recovery. Clean Harbors stores these solvents and wastewaters in tanks and containers prior to recycling. Clean Harbors also performs fuel blending in 14 permitted treatment tanks. Clean Harbors continues to receive mostly dry-cleaning wastes to process and plans to eventually phase out its current wastewater recycling business.

The Hebron Recycle Center is a permitted treatment, storage, and disposal (TSD) facility; Ohio EPA issued a renewal hazardous waste installation and operation permit for the storage of off-site hazardous waste on June 17, 2005. A Class 3 permit modification was approved on January 5, 2007, which increased the container and tank storage capacity by 818,440 gallons, permitted the facility to receive an additional 25 waste codes, and permitted 2 tanks for treatment (fuel blending). An additional Class 2 permit modification was approved on July 11, 2008, which permitted 12 additional tanks for fuel blending.

Solvent recycling processes include separation/reclamation in two thin film evaporators (LUWAs) and one distillation column, and reclamation in one washex pot still and four cookers. The company receives mostly drycleaning wastes, as well as solvents from other industrial customers. Most of this waste is perc, but the facility also processes mineral spirits, and other solvents, such as TCE and methylene chloride. Recently, the facility's flammables market has increased, and Clean Harbors is bringing in a lot more to process (e.g., acetone, xylene, IPA, toluene). The company receives shipments of hazardous waste in containers of various types and sizes and in bulk via tanker trucks. Additionally, the facility receives a few hazardous wastewaters from other customers for reclamation. Clean Harbors also blends certain waste solvent/petroleum materials into fuels, which are transported off site and sold as industrial furnace fuels. Finally, the company processes scrap plastics (plastic drums and bottles), which are shredded, washed, chipped, and then resold to a plastics re-processor.

Dry cleaning wastes are processed in the "blues room." The filters are processed in the shredder system prior to being processed in the cookers, and the other drycleaner wastes (e.g., bottoms) are dumped into the jacuzzi tank to separate out the solids, which are then processed in the cookers to recover the solvent by evaporation. The liquid is pumped to a storage tank and eventually processed in the cookers to recover the solvent by evaporation. The solvent distillate and bottoms are fed through a column until Clean Harbors recovers the product (e.g., industrial perc has a purity specification of 98.5% and the dry cleaning perc specification is 99.5%). The solids from the cookers are discharged to an auger system. Metals are separated out and sent to a metal re-claimer. The other solids are accumulated in a <90-day container (i.e., dump trailer) located near the regenerative fume oxidizer, and then they are exported to a landfill in Ontario, Canada, for disposal.

The hazardous wastewaters are sampled, filtered, and then fed to the thin film evaporators where any residual solvents are recovered. The water extracted in the process is treated in the on-site wastewater treatment plant, analyzed for metals, and then discharged to the publicly owned treatment works. The recovered solvent is blended into fuel.

Several other waste streams are also generated by Clean Harbors, but much of this waste can be reintroduced into the recycling process (e.g., perc trash, wastewater treatment plant sludges,

contaminated wipers, filter bags, laboratory and sample waste, media from the air stripper, and some perc solids). Clean Harbors has various satellite accumulation areas around the facility for accumulation of these wastes prior to reintroducing them into the recycling process. There is a 55-gallon drum for the accumulation of lab sample waste, as well as other satellite areas throughout the lab for wastes from each lab analysis/procedure. Also, there is a satellite accumulation drum for each of the four cookers to collect perc waste from the recycling process.

Used oil is generated through equipment and fork truck maintenance, and a continued use solvent parts cleaner is available in the maintenance building. The facility also produces a minimal volume of waste fluorescent tubes as a result of burned out bulb replacement. These spent lamps are accumulated in the maintenance building before being shipped off site as universal waste.

A regenerative fume oxidizer (RFO) system treats organic vapors from the majority of the facility.

Clean Harbors is also performing site-wide corrective action because a significant quantity of solvent was released on site due to a fire at the facility in 1985 (when the facility was owned by Safety-Kleen). In addition, ground water contamination due to releases from a hazardous waste underground storage tank (UST) unit was documented when these tanks were closed in the late 1980s, so the unit was closed as a landfill. The company is subject to post-closure care requirements and ground water corrective action for the releases from the UST unit. The company is operating a ground water pump-and-treat system, as well as a water and soil vapor extraction system to treat the contaminated soil and ground water, and semi-annual ground water monitoring and reporting is required by the Part B permit.

WASTE ACTIVITIES AND P2 SUMMARY SECTION

For each of the processes listed above that generate a waste give the following information: (1) name of process generating waste, (2) name or description of waste generated (e.g. sludge, solvent, ash, used oil, spent lamps, etc.), (3) EPA waste codes, if applicable, (4) quantity generated per month, (5) type of accumulation (container, tank, etc.) (6) waste accumulation location in facility, (7) type of on-site treatment (if used), (8) name of off-site management facility and type of waste management activity occurring there, (9) Current P2 activities, and (10) P2 opportunities.

In 2010, the Hebron Recycle Center (HRC) received and processed approximately 19 million pounds of hazardous waste for solvent recovery and 2.4 million pounds of hazardous waste for fuel blending (based on the 2010 Annual Report).

Much of the hazardous waste generated in the reclamation processes is accumulated and managed as hazardous waste then reintroduced into the reclamation process. This includes wastewater treatment plant sludge, contaminated wipers, filter bags, laboratory and sample waste, air stripper media, and some perc solids. These wastes are collected in hoppers or other small containers prior to being recycled. Several satellite accumulation areas are present around the facility for accumulation of these wastes.

Finer solids (thermal set bottoms, ground perc filters, perc muck, other processing wastes) are also generated from solvent recycling activities. These "perc fines" are collected in roll-off boxes and shipped to Clean Harbors Canada, LTD in Ontario, Canada where they are landfilled. Waste codes that apply to this waste stream include D004, D006, D007, D008, D009, D011, D018, D035, D039, D040, F001 and F002. The HRC has evaluated waste reduction options for

this waste stream and has concluded that the generation of this waste stream is associated entirely with the volume of solvent bearing wastes received that are contained in a solid or sludge matrix.

Still bottoms are another hazardous waste generated in the solvent recycling process. This waste stream currently carries waste codes D001, D006, D008, D035, D039, D040, F001, F002, F003, and F005. The facility ships this waste off site to various facilities for fuel blending. With regard to P2, in order to maximize the recycling of solvent wastes, this material is shipped to off-site facilities for energy recovery. The Hebron facility maximizes the solvent recovery rate through process monitoring and controls.

The HRC is also permitted to blend waste received from off site into fuel. In 2010, Clean Harbors processed 2.4 million pounds of hazardous waste for fuel blending. Flammable liquids/fuel blends are currently being sent to Lone Star Green Castle WDF or Clean Harbors El Dorado, among others, for energy recovery or incineration.

Clean Harbors also sends flammable waste liquids to its facility in Ontario, Canada, for incineration. This waste stream carries waste codes that include D001, D004, D006, D008, D009, and D011.

Wastewater is also generated from solvent recycling activities. This wastewater is biologically treated in the on-site wastewater treatment plant before being discharged to Hebron's publicly owned treatment works. Waste codes applicable to this waste stream include D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043, F001, F002, F003, F004, and F005. The wastewater treatment sludge is reintroduced into the recycling process.

Clean Harbors is also a small quantity handler of universal waste lamps. The facility produces a minimal volume of waste fluorescent tubes as a result of burned out bulb replacement. Four-foot and eight-foot bulbs are being sent as universal waste to Clean Harbors El Dorado, while mercury vapor lamps are sent to Spring Grove and then onto USA Lamp for recycling. As part of the facility's pollution prevention activities, the facility is using longer life bulbs and energy efficient ballasts. Additionally, they have started to use less hazardous bulbs (i.e., green tips). Universal waste batteries are being shipped to Toxco, but none were on site at the time of the inspection. The facility also generates used oil, which is reintroduced into the process. (No used oil was on site at the time of the inspection).

Metal waste in the recycling process is magnetically separated from the other solids, is collected in a dump truck, and sent to a metal re-claimer (Crispin Auto Wrecking). In addition, Clean Harbors shreds unusable empty metal and plastic drums. The metal is sent off site as scrap to Crispin, while the plastic is sent to a plastic's re-processor. Usable drums are shipped to MCF for reuse.

Unusable empty metal drums are shipped to Industrial Container Service (formerly Queen City Barrel), while good plastic drums are shipped to MCF for reuse.

Parts washer solvent is in Safety-Kleen's continued use program, and the unit is serviced by the Groveport branch.

Other non-hazardous wastes generated at the Hebron Recycle Center include plastic, wooden pallets, and cardboard. The plastic is shredded and washed prior to shipment to a plastic re-processor (Montgomery Paper Company). All wash water is treated on site in the facility wastewater treatment plant. Wooden pallets received with incoming containers are collected by a local company that creates mulch from scrap wood. Cardboard used for packages received by the facility is collected and shipped to a recycler.

Additional P2 remarks and information:

Per the facility's 2009 Waste Minimization and Pollution Prevention Program Report (received January 13, 2010). Clean Harbors has implemented a number of operating practices. For example, their paper waste is shredded and used in solids conveying operations. They do not mix used petroleum products with other solvent waste when the amount of used petroleum products warrants segregating the streams. They also send incoming pallets to a pallet recycler. These are just a few of their operating practices.

There are other pollution prevention measures currently in place at this facility. For example, process wastewater is used in the drum cleaner unit onsite to rinse and clean reusable dry cleaning solvent and filter drums after the dry cleaning wastes have been removed. Used fluorescent light bulbs are accumulated and shipped to a bulb recycler. This ensures that these potentially toxic materials are properly managed, and materials are recycled to the extent possible. Again, these are just a few of the pollution prevention measures that Clean Harbors currently has in place at their Hebron facility.

Per the facility's permit, the next waste minimization report is due in January 2012.

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

| | | | |
|----|---|--|--|
| 1. | Has the expiration date of the permit passed? If so: | | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| | a. | Is the permittee continuing any activity regulated by the permit after the expiration date of the permit? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | b. | Has the facility submitted an application for a permit renewal to the director no later than 180 days prior to the expiration date of the permit? [Condition A.6] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 2. | Has the permittee submitted the annual permit fee, payable to "Treasurer, State of Ohio," to Ohio EPA on or before the anniversary of the date of issuance during the term of the permit? [Condition A.26] | | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 3. | Is the permittee conducting any hazardous waste management activities (not otherwise exempt by law) which are not authorized by the permit? [Conditions A.1(b) and A.5] | | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 4. | Have any provisions of the permit been identified as invalid? [Condition A.4] | | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 5. | Has the permittee identified any instances of noncompliance with the permit, ORC Chapter 3734. or the rules adopted thereunder, which may endanger human health or the environment? If so: | | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| | a. | Did the permittee immediately report the following to Ohio EPA's Emergency Response Unit? [Condition A.20] | |
| | i. | Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | ii. | Information concerning a release of hazardous waste, fire or explosion at the facility which could threaten human health or the environment outside the facility including a description of: | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | | A. Name, address and telephone number of the owner/operator? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | | B. Name, address and telephone number of the facility? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | | C. Date, time and type of incident? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | | D. Name and quantity of material(s) involved? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | | E. The extent of injuries, if any? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | | F. An assessment of the actual or potential hazard to the environment and human health outside the facility? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | | G. Estimated quantity and disposition of recovered material that resulted from the incident? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 6. | Did the permittee provide a written report to Ohio EPA's Emergency Response Unit and DHWM within 5 days of becoming aware of the circumstances reported in Questions No. 5? If so, did the report contain: [Condition A.21] | | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | a. | A description of the noncompliance and its cause (including exact dates and times)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | b. | Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? and | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | c. | Steps taken or planned to minimize the impact on the environment and to reduce, eliminate and prevent recurrence of the noncompliance? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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

| | | |
|----|---|--|
| 7. | Has the permittee identified other instances of noncompliance not provided for in Condition A.22? If so: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Did the permittee report these instances to Ohio EPA, DHWM? [Condition A.22] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Do the reports provided contain the information set forth in Condition A.20? [Condition A.20] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| c. | Has the permittee taken all steps necessary to minimize releases to the environment or prevent any adverse impact on human health or the environment? [Condition A.8] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | If so, has the permittee provided Ohio EPA with advance notice of such changes? [Condition A.17] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

NOTE: Such notification does not waive the permittee's duty to comply with the permit. [Condition A.17]

| | | |
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| 9. | Has the permittee become aware that it failed to submit any relevant facts in the permit or issuance proceedings or that it submitted incorrect or incomplete information in permit issuance proceedings or other submissions to Ohio EPA? If so: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Has the permittee properly submitted such facts or corrected information to the appropriate entity? [Condition A.24] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

PERMIT MODIFICATION, REVISION, REVOCATION

| | | |
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| 10. | Has the permittee filed a request for a permit modification, revision or revocation since permit issuance? [Condition A.2] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 11. | Has the permit, been transferred to a new owner/operator? If so: | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Has the transfer been conducted in accordance with ORC Chapter 3734. and the rules adopted thereunder which includes the permittee notifying the new owner in writing of the requirements of ORC Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules before transferring ownership? [Condition A.18] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 12. | Has the permittee submitted reports 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 13. | Has the permittee furnished relevant information which Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, to determine compliance with the permit? [Condition A.10] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 14. | Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 15. | Is the permittee maintaining records of all data used to complete the application and any amendments, revisions or modifications to the application? [Condition A.14c] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 16. | Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14c] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 17. | Is the permittee planning any physical alterations or additions to any permitted portions of the facility? If so: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Has the permittee given notice to the director of such alterations/additions? [Condition A.15] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

SITE ENTRY - AVAILABILITY OF RECORDS

| | | | |
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| 18. | As specified in Condition A.11, has the permittee allowed the director or an authorized representative, upon proper identification to: | | |
| a. | Enter at reasonable times upon the premises where a regulated activity is located or where records are kept under the conditions of the permit? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> | |
| b. | Have access to and copy, at reasonable times, any records required to be kept under the conditions of the permit? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> | |
| c. | Inspect, at any time, facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> | |
| d. | Sample, document, photograph or monitor, at reasonable times, any substances or parameter at the location of the facility to assure compliance with the permit or as otherwise authorized by ORC Chapter 3734. and the rules adopted thereunder? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> | |

INSPECTION ITEMS FROM PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

RECORDKEEPING/OPERATING REQUIREMENTS

OPERATING RECORD

| | | | |
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| 19. | In accordance with OAC rules 3745-54-73 and 3745-54-74 and Condition B.22 of the permit, does the permittee maintain an Operating Record which contains the following information: | | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | A description of the quantity of each hazardous waste and the method(s) and date(s) of its treatment or storage? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> | |
| b. | The location of each hazardous waste and quantity at each location including cross-reference to specific manifest numbers? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> | |
| c. | Records and results of required waste analysis? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> | |
| d. | Summary reports and details of all incidents that required implementation of the contingency plan? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> | |
| e. | Records and results of required inspections? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> | |
| f. | Documents required to be maintained by LDR requirements of OAC Chapter 3745-270? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> | |
| g. | Monitoring, testing, or analytical data, and corrective action where required, from groundwater monitoring and required monitoring of surface impoundments, landfills, waste piles and land treatment units? [3745-54-73(B)(6)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> | |
| h. | For disposal facilities , location and quantity of each hazardous waste record on a facility map and cross-references to manifest document numbers? [3745-54-73(B)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> | |

DOCUMENTS TO BE MAINTAINED AT FACILITY

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| 20. | In accordance with Condition A.28 of the permit, is the permittee maintaining the following documents at the facility: | | |
| a. | Waste analysis plan in accordance with OAC rule 3745-54-13? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> | |
| b. | Contingency plan in accordance with OAC rule 3745-54-53? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> | |

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| | c. | Closure plan in accordance with OAC rule 3745-55-12? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | d. | Cost estimate for facility closure in accordance with OAC rule 3745-55-42? (Estimate only - adequacy will be evaluated by CO financial assurance personnel) [Condition B.36] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | e. | Personnel training plan and records required by OAC rule 3745-54-16(E)? [Condition B.6] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | f. | Inspection schedules developed in accordance with OAC rules 3745-54-15, 3745-55-74 and 3745-55-95? [Condition B.5] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | g. | Operating record in accordance with OAC rule 3745-54-73? [Condition B.22] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | h. | Post-closure plan, as required by OAC rule 3745-55-18(A)? [Condition A.28(a)(viii)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | i. | Annually-adjusted cost estimate for facility closure and post-closure, as required by OAC rules 3745-55-42 and 3745-55-44? [Condition A.28(a)(ix)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 21. | | Is the permittee maintaining copies of all inspection logs at the facility for a period of at least 3 years from date of inspection? [Condition B.5] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 22. | | Have any of the documents in Question No. 20 been revised? [Condition A.15] If so: | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | a. | Has the permittee submitted the revisions to Ohio EPA in accordance with OAC rule 3745-50-51? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. | Have all requirements of OAC rule 3745-50-51 been met, including, where required, Ohio EPA approval? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| ANNUAL REPORT REQUIREMENT | | | |
| 23. | | 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? [Condition B.25] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS | | | |
| 24. | | 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. | Individual(s) who performed the sampling or measurement? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | c. | Date(s) analyses were performed? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | d. | Individual(s) who performed the analyses? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | e. | Analytical technique(s) or method(s) used? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | f. | Results of such analyses? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 25. | | Have the methods used to obtain a representative sample of the waste to be analyzed included the appropriate SW-846 method or an equivalent method specified in the approved waste analysis plan? [Condition A.12(a)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 26. | | In accordance with Condition A.14 of the permit, is the permittee retaining records of monitoring information as required by the permit for at least 3 years from the date of sampling, including: | |
| | a. | All calibration and maintenance records? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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| 27. | Has Ohio EPA requested submittal of any reports or other information from the permittee? If so: | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Have the submittals been signed and certified according to OAC rule 3745-50-42? [Condition A.13] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

WASTE MINIMIZATION REQUIREMENTS

| | | |
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| 28. | Does the permittee certify at least once every year that a program is in place to reduce the volume and toxicity of hazardous waste generated in accordance with Condition A.29(a) of the permit and OAC rule 3745-54-73(B)(9)? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 29. | Did the permittee submit the waste minimization report to Ohio EPA, Office of Compliance Assistance & Pollution Prevention and Central District Office within 180 days of journalization of this permit and updates biennially thereafter? [Condition A.29] The next report is due in January 2012. | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 30. | Has the permittee reduced the amount of waste (hazardous waste, solid waste, air emission, waste water discharges, etc.) this year generated at their facility by implementing pollution prevention/waste minimization? Since the Hebron Recycle Center is a TSD that receives and recycles solvents from different customers, much of the waste that is generated from the recycling process is associated entirely with the amount of solvent bearing wastes received at the facility for reclamation (i.e., related to business). | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | If so, what amount of waste has the permittee reduced this year? | |
| 31. | Has the permittee saved money this year by implementing pollution prevention (reducing raw material usage, disposal fees, energy savings, etc.)? See above and the "Waste Activities and P2 Summary Section" for additional discussion. | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | If so, how much money has the permittee's company saved this year? | |

NOTE: If this facility is inspected two times a year, the information obtained in Questions 28 through 31 only needs to be collected one time for the calendar year.

GROUND WATER MONITORING

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| 32. | Has the permittee conducted sampling of their monitoring wells? [Condition J.9 & J.10] Ohio EPA's Division of Environmental Response and Revitalization (DERR) is responsible for overseeing corrective action and ground water monitoring activities at the facility. | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 33. | Have they reported the results in the Annual Report to the director by March 1 st as required by Condition B.25 of the permit? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

WASTE ACCEPTANCE AND GENERATION

| | | |
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| 34. | Is the permittee storing any containers of hazardous waste received from any off-site source that permittee is not permitted to store? [Condition A.1.] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 35. | Has the permittee arranged to receive hazardous waste from a foreign or off-site source that the permittee is not permitted to store? [Condition A.1.] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 36. | Has the permittee notified the regional administrator of U.S. EPA at least four weeks prior to the date the permittee expects to receive hazardous | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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| | waste from a foreign source, as required by OAC rule 3745-54-12(A)? [Condition B.2(b)] | |
| INSPECTION ITEMS FROM THE PART B APPLICATION | | |
| <i>NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.</i> | | |
| OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS | | |
| 37. | 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 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(B)(C)(D)? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d. | Prepared manifests have been signed by the permittee and initial transporter in compliance with OAC rule 3745-52-23? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 38. | As a permittee that generates hazardous waste, are signed copies of all hazardous waste manifests and any documentation required for exception reports retained for at least 3 years at the facility as required by OAC rules 3745-52-40 and 3745-54-71(A)(2)(e)? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| <i>NOTE: If the permittee is generating hazardous waste, remember to attach a complete generator checklist.</i> | | |
| 39. | Does the permittee use only properly registered transporters when removing hazardous wastes? [Condition A.16] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 40. | Does the permittee give one copy of the manifest to the transporter, send one copy to the generator within 30 days, and keep one copy for at least 3 years? [3745-54-71(A)(2)(c)(d)(e)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met? [3745-54-71(B)(3)(4)(5)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Are any significant discrepancies in the manifest, as defined in OAC rule 3745-54-72(A) noted in writing on the manifest or shipping paper? [3745-54-71(A)(2)(b)] & [3745-54-71(B)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 41. | Have any manifest discrepancies been reconciled within 15 days as required by OAC rule 3745-54-72(C)? [Condition B.24(b)] If not: | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| a. | Has the permittee submitted the required information to the director? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 42. | Has the permittee rejected any hazardous waste load or identified a container residue that exceeds the quantity limits for "empty" containers? [Condition B.24] If so: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Did the permittee consult with the generator prior to forwarding the rejected waste to an alternate facility? [3745-54-72(D)(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Did the permittee send the rejected waste to an alternate facility or return the rejected waste to the generator within 60 days after the rejection? [3745-54-72(D)(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| c. | While the permittee is making arrangements for forwarding rejected waste to another facility, did the permittee ensure that either the delivering transporter retained custody of the waste or did the permittee provide for secure, temporary custody of the waste? [3745-54-72(D)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| d. | Did the permittee prepare a manifest in accordance with OAC rules | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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| | 3745-54-71(E)(1) through (7) for rejected waste to be sent to an alternate facility? [3745-54-72(E)] | |
| e. | Did the permittee prepare a manifest in accordance with OAC rules 3745-54-72(F)(1) through (7) for rejected waste to be sent back to the generator? [3745-54-72(F)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 43. | If the permittee receives hazardous waste imported from a foreign source, has the permittee mailed a copy of the manifest to U.S. EPA within 30 days after a delivery? [3745-54-71(A)(3)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 44. | Does the permittee send a hazardous waste shipment to a consignment state (i.e., the state in which the hazardous waste shipment will be transported and subsequently managed)? If so: | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Has the permittee determined whether the consignment state for a shipment regulates any additional wastes (beyond those regulated federally) as hazardous wastes under its state hazardous waste program? [3745-54-71(E)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Has the permittee determined whether the consignment state requires the permittee to submit any copies of the manifest to the state? [3745-54-71(E)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 45. | If the permittee has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by OAC rule 3745-54-76(A) been submitted to the director within 15 days? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| WASTE ANALYSIS/WASTE ANALYSIS PLAN | | |
| 46. | Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information of the waste in accordance with OAC Chapters 3745-54 to 3745-57, 3745-205 and 3745-270 and the terms and conditions of the permit? [Condition B.3(a)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 47. | Does the permittee follow the procedures described in the WAP (Application Appendix 3-1)? [Condition B.3(b)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 48. | In accordance with OAC rule 3745-54-13(A)(3), does the permittee repeat the waste analysis when the process or operation generating the hazardous waste has changed, or at least annually? [Condition B.3] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 49. | FOR OFF-SITE FACILITIES: Are the sampling methods and procedures specified in the permittee's WAP that will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identification of the waste on the manifest [3745-54-13(C)]? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 50. | FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER OAC rule 3745-270-04(A): | |
| | Does the waste analysis plan include procedures and schedules for: | |
| a. | The sampling of impoundment contents? [3745-54-13(B)(7)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | The analysis of test data? [3745-65-13(B)(7)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| c. | The annual removal of residues which are not delisted or which exhibit the characteristic of a hazardous waste and either do not meet treatment standards (OAC rules 3745-270-40 to 3745-270-49) or where no treatment standards have been established? [3745-54-13(B)(7)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 51. | Where applicable: The methods which will be used to meet additional waste analysis requirements for specific waste management methods specified in OAC rules 3745-54-17, 3745-57-14, 3745-57-41 and 3745-270-07? [3745-54-13(B)(6)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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| 52. | Does the permittee place the results of all waste analyses in the facility operating record in accordance with OAC rule 3745-54-73? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| INSPECTION ITEMS FROM THE PART B APPLICATION | | |
| <i>NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.</i> | | |
| GENERAL INSPECTION REQUIREMENTS | | |
| <i>NOTE: Inspector may attach a copy of the inspection procedures and schedules. If so, the attached document is referenced as Appendix _____.</i> | | |
| 53. | Is the permittee following the inspection procedures and schedules as set forth in the permit (Section 6.2 of the approved permit application) and the requirements of OAC rules 3745-54-15(A),(C) and (D)? [Condition B.5] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 54. | Is the permittee following the approved inspection schedule for inspecting monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment as specified in OAC rule 3745-54-15(B)? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Is the schedule kept at the facility? [3745-54-15(B)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 55. | 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 56. | In accordance with OAC rule 3745-54-15(D) and Condition B.5 of the permit, do inspection records contain the following information: | |
| a. | Date and time of inspection? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Name of inspector? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Notation of observations made? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d. | Date and nature of any repairs or other remedial actions? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| INSPECTION ITEMS FROM THE PART B APPLICATION | | |
| <i>NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.</i> | | |
| SECURITY REQUIREMENTS | | |
| 57. | Is the permittee complying with the following security provisions of OAC rule 3745-54-14 and Condition B.4 of the permit: [Section 6.1 of the approved permit application]? | |
| a. | Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | A means to control entry, at all times, through gates or other entrances, to the active portion of the facility? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 58. | In accordance with OAC rule 3745-54-14(C), does the permittee have signs reading "Danger - Unauthorized Personnel Keep Out" posted at entrances of the hazardous waste container storage building number _____? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| FACILITY OPERATIONS | | |
| 59. | Is construction, maintenance and operation of the facility being conducted to minimize the possibility of a fire, explosion, or unplanned sudden or non- | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

| | | |
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| | sudden release of hazardous waste or hazardous waste constituents to air, soil, ground or surface water? [3745-54-31 and Condition B.1] | |
| 60. | Does the permittee properly maintain and operate the facility to achieve compliance with the terms and conditions of the permit including: [Condition A.9] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | a. Effective management practices? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. Adequate funding? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | c. Adequate operator staffing and training? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | d. Adequate laboratory and process controls? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

PERSONNEL TRAINING

| | | |
|-----|--|--|
| 61. | Is the permittee conducting personnel training in accordance with the conditions of the permit and with the following requirements of OAC rule 3745-54-16? [Condition B.6] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | a. Does the permittee provide personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [3745-54-16(A)(B)(C)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. Does the permittee provide personnel training to new employees within six months after their date of employment as required by OAC rule 3745-54-16(B)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | c. Does the permittee provide an annual refresher training course as required by OAC rule 3745-54-16(C)? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 62. | Is the permittee maintaining personnel training records as required by OAC rule 3745-54-16(D) and Section ____ of the approved permit application, including: written job titles, job descriptions and documented employee training records? [Condition B.6] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

REQUIRED EQUIPMENT

NOTE: Inspector may attach a list of emergency equipment. If so, the attachment document is referenced as Appendix ____.

| | | |
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| 63. | Has the permittee equipped the facility with the following emergency equipment as required by OAC rule 3745-54-32 and Condition B.9 of the permit: | |
| | a. An internal communications or alarm system? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. A device such as a telephone which is capable of summoning emergency assistance from local emergency authorities? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | c. Portable fire extinguishers and/or fire control equipment, spill control and decontamination equipment? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | d. Water in adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers or water spray systems? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 64. | Is the permittee inspecting, testing and maintaining the equipment specified | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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| | in Question No. 63 to ensure its proper operating in accordance with OAC rule 3745-54-33 and Condition B.10 of the permit? | |
| 65. | 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 Condition B.11 of the permit? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

CONTINGENCY PLAN - EMERGENCY PROCEDURES

| | | |
|-----|--|--|
| 66. | In compliance with Condition B.13 of the permit and OAC rule 3745-54-37(A), does the permittee: | |
| | a. Familiarize emergency response agencies with the layout of the facility, associated hazards, places where personnel will normally be working, entrances and possible evacuation routes? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. Inform such agencies of safety equipment, supplies, proper emergency safety procedures that are applicable to the facility? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | c. Familiarize the local hospital listed in the approved application with the properties of hazardous waste handled at the facility and the types of injuries or illness that could result from fires, explosions or releases at the facility? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 67. | Has a state or local agency declined to enter into the arrangements set forth in OAC rule 3745-54-37(A)? If so: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| | 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 68. | 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 authorities, agencies and response contractors designated in the approved contingency plan? [Condition B.18(b)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 69. | Has the permittee notified all parties identified in the contingency plan in writing of amendments, modifications, or revisions to the plan within 10 days of the effective date of the change in the plan? [Condition B.18(b)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 70. | Has the permittee submitted a copy of the approved contingency plan and all revisions, amendments and modifications to the Ohio EPA, Division of Response and Revitalization (DERR) in accordance with OAC rule 3745-54-53? [Condition B.18(c)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 71. | 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: Also see Question 22 to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.

EMERGENCY COORDINATOR

| | | |
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| 72. | 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 73. | In accordance with OAC rule 3745-54-55 and Condition B.19 of the permit, is/are the emergency coordinator(s) at the facility familiar with the following: | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | a. Contingency plan? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. Facility operations/activities? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | c. Waste characterization and location? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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| | d. | Location of all records in the facility? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | e. | Facility layout? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 74. | | 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 75. | | Does the permittee have a contingency plan for the facility that: [Condition B.15] | |
| | a. | Describes the actions facility shall take to comply with OAC rules 3745-54-51 through 3745-54-56 in response to fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil or surface water at the facility? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. | Describes arrangements agreed to by local police, fire departments, hospitals, contractors and Ohio EPA and the local emergency response team to coordinate emergency services? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | c. | Includes an up-to-date list of names, addresses and phone numbers (office and home) for all persons qualified to act as emergency coordinator in the order that they will assume responsibility for coordination of emergency response? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | d. | Includes a list of all emergency equipment, including fire extinguishing systems, spill control equipment, communications and alarm systems and decontamination equipment? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | e. | Includes the location and a physical description of each item on the list referenced in Question No. 75(d), and a brief outline of its capabilities? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | f. | Includes an evacuation plan for facility personnel describing signals to be used to begin evacuation, evacuation routes, and alternate evacuation routes, in situations where the primary routes could be blocked by releases of hazardous waste? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: If the permittee 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 permittee can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The permittee may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-54-52(B)]

IMPLEMENTATION OF CONTINGENCY PLAN

| | | | |
|-----|--|--|--|
| 76. | | Has there been a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment since the date of the last inspection? If so: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|-----|--|--|--|

NOTE: Example scenarios that could be threats to human health or the environment are provided in a DHWM guidance document on "Contingency Plan Implementation and Incident Reporting Under Ohio Hazardous Waste Rules" at: http://epa.ohio.gov/portals/32/pdf/Contingency_Plan_and_Incident_Reporting.pdf. Facility specific scenarios are included in the permittee's contingency plan.

| | | | |
|--|-----|--|--|
| | a. | Did the permittee immediately implement the approved contingency plan and follow the emergency procedures described in OAC rule 3745-54-56? [Conditions B.14 and B.20] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | b. | Did the permittee immediately notify Ohio EPA's emergency response team using the 24-hour toll free number (800)282-9378 providing the following information: [3745-54-56(D)(2)] | |
| | i. | Name and telephone number of the reporter? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | ii. | Name and address of the facility? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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| | iii. | Time and type of incident? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | iv. | Name and quantity of materials involved? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | v. | The extent of injuries? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | vi. | The possible hazards to human health or the environment outside the facility? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| c. | | Did the permittee collect and manage as hazardous waste all liquid or solid material resulting from fire, explosion, released material or emergency response materials until such time as the permittee can demonstrate to Ohio EPA that such waste are not hazardous wastes? [Condition B.16] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| d. | | Within 15 days after the incident did the permittee submit to the director a written report of the incident? If so: | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | i. | Did the report contain the elements set forth in OAC rule 3745-54-56(I)? [Condition B.23] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| e. | | 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 as required by OAC rule 3745-54-56(I)? [Condition B.23] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

CLOSURE REQUIREMENTS

| | | | |
|---|----|---|--|
| 77. | | Does the permittee maintain the approved closure plan at the facility? [Condition B.29] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 78. | | Is the permittee keeping at the facility and submitting annually to Ohio EPA, the latest closure cost estimate as required by OAC rule 3745-55-42(D)? [Condition B.36] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 79. | | Has the permittee amended the closure plan? If so: | |
| | a. | Has the plan been amended in accordance with OAC rule 3745-55-18(D)? [Condition B.28] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| <i>NOTE: Also see Question 22 to verify that any changes to the closure plan were submitted in accordance with OAC rule 3745-50-51.</i> | | | |
| 80. | | Has the permittee closed the facility? If so: | |
| | a. | Did the permittee complete closure of the facility 180 days after receiving the final volume of hazardous waste? [Condition B.31] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | b. | Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | c. | Did the permittee carry out the approved closure plan as set found in Section _____ of the approved permit application? [Condition B.27] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | d. | After receiving the final volume of hazardous waste, did the permittee remove 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | e. | 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | f. | Has the permittee certified that the facility has been closed in accordance with the specifications in the approved closure plan as | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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| | required by OAC rule 3745-55-15? [Condition B.33] | |
| g. | 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] The Underground Storage Tank (UST) area (former location of tank #s 18, 19, 20, and 21) was closed in accordance with the interim standards closure/post-closure plan approved by Ohio EPA on September 30, 1992. This unit had to be closed as a landfill due to residual waste constituents found in the tank cavity (soil and groundwater) that could not be removed at the time closure occurred. The post-closure care period for the unit began on March 29, 1993, the date that closure of the unit was completed. The notices required to be filed pursuant to OAC Rules 3745-55-16 and 3745-55-19 were completed prior to Ohio EPA's acceptance of the closure certification for the UST area. | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

POST-CLOSURE MAINTENANCE

NOTE: Inspector may attach a post-closure maintenance inspection schedule. If so, the attached document is referenced as Appendix _____.

| | | |
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| 81. | Has the permittee inspected the components, structures, and equipment at the site in accordance with the inspection schedule in Section ____ of the approved permit application on a quarterly basis? [OAC rule 3745-55-17(A)(1)(b)] [Condition B.35] The UST area was closed in accordance with the interim standards closure/post-closure plan approved by Ohio EPA on September 30, 1992. This unit had to be closed as a landfill due to residual waste constituents found in the tank cavity (soil and groundwater) that could not be removed at the time closure occurred. The area is currently in the post-closure care period which includes groundwater monitoring and corrective action. | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 82. | Has the permittee conducted and recorded an inspection of at least the following? [Condition B.35] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Security control devices (gates, locks, fences and signs); | |
| b. | Erosion control; | |
| c. | Cover settlement, subsidence and displacement; | |
| d. | Vegetative cover conditions; | |
| e. | Integrity of run-on/run-off control measures; | |
| f. | Cover drainage system functioning; | |
| g. | Monitor well conditions; and | |
| h. | Benchmark integrity. | |
| 83. | Is the permittee using the inspection forms found in the approved Part B permit application? [Section ____ of the approved permit application] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 84. | Have suitable repairs been made within a reasonable amount of time? [Condition B.35] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 85. | Have repairs been indicated on the Notification Repair Form? [Condition B.35] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 86. | Was the Notification of Repair Form submitted to Ohio EPA within one | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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| week after determining that repairs are necessary? [Condition B.35] | |
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INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

STORAGE OF HAZARDOUS WASTES IN CONTAINERS

NOTE: The requirements of Condition C do not apply to the permittee's activities as a generator accumulating hazardous waste for <90 days per OAC rule 3745-52-34(A). Please complete the applicable sections of the Generator Requirements checklist to document compliance with activities associated with <90 day accumulation of wastes.

CONDITION OF CONTAINERS

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| 87. | Are containers holding hazardous wastes in good condition as required by OAC 3745-55-71? [Condition C.4] If not: | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | a. Did the permittee transfer the hazardous waste from such a container to one that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit? [Condition C.4] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 88. | Does the permittee ensure that all containers used at the facility are compatible with the hazardous waste to be stored in them as required by OAC rule 3745-55-72? [Condition C.5] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 89. | Does the permittee keep all containers closed during storage except when it is necessary to add or remove waste as required by OAC rule 3745-55-73? [Condition C.6(a)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

CONTAINERS - INSPECTIONS

NOTE: Inspector may attach a container inspection checklist. If so, the attached document is referenced as Appendix

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| 90. | Is the permittee inspecting the container area weekly in accordance with OAC rule 3745-55-74 and the approved inspection schedule in Section 6.2 of the approved permit application to detect leaking containers and deterioration of containers and the containment system? [Condition C.9] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken as required by OAC rule 3745-54-15(D)? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

STORAGE OF HAZARDOUS WASTE IN TANK SYSTEMS

TANK SYSTEMS - CONDITIONS

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| 91. | Is each tank clearly labeled/marked with the words "Hazardous Waste?" as required by OAC rule 3745-52-34(A)(3)? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 92. | In accordance with OAC rule 3745-55-94 and Condition D.5 of the permit, does the permittee follow the general operating requirements below: | |
| | a. Does the permittee 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? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. Does the permittee use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | c. If a leak or spill has occurred in the tank system, has the permittee complied with OAC rule 3745-55-96? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

TANK SYSTEMS - INSPECTIONS

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| 93. | In accordance with OAC rule 3745-55-95(A) and Condition D.6(b) of the | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
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| | permit, does the permittee develop and follow a schedule and procedure for inspecting overfill controls? | |
| 94. | Has the permittee documented the inspections required in OAC rules 3745-55-95, in the operating record, including inspection of the following: [Condition D.6(c)] | |
| a. | Above ground portion of tank each operating day? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Data from leak detection equipment each operating day? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste each operating day? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 95. | For ancillary equipment NOT provided with secondary containment, has the permittee documented inspections of such equipment each operating day? [3745-99-95(F)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| NOTE: "Each operating day" is each day that the tank system is being used to manage (store or treat) hazardous waste. | | |
| NOTE: Ancillary equipment required to be provided with secondary containment are described in OAC 3745-55-93(F). | | |
| 96. | For tank systems using leak detection systems to alert facility personnel to leaks or implementing established workplace practices to ensure leaks are promptly identified, has the permittee documented: [3745-55-95(D)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Inspections of above ground portion of tank weekly? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Inspections of construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste weekly? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Use of the alternate inspection schedule, including a description of the established workplace practices at the facility? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 97. | Where applicable, does the permittee inspect the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter, as required by OAC rule 3745-55-95(G)(1)? [Condition D.6(d)(i)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 98. | Where applicable, does the permittee inspect all sources of impressed current at least bi-monthly as required by OAC rule 3745-55-95(G)(2)? [Condition D.6(d)(ii)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| TANK SYSTEMS – CLOSURE REQUIREMENTS | | |
| 99. | If the permittee has closed a tank, was closure completed in accordance with OAC rule 3745-55-97? [Condition D.9] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| TANK SYSTEMS – STORING IGNITABLE OR REACTIVE WASTES | | |
| 100. | For tanks used to treat or store ignitable or reactive wastes, has the permittee complied with one of the following in accordance with OAC rule 3745-55-98(A)? [Condition D.10(a)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Is the waste treated before or immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the permittee has conducted such activities in compliance with OAC rule 3745-54-17(B)?; or | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction?; or | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Is the tank used solely for emergencies? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 101. | If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

| | | |
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| | alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (2008)? [Condition D.10(b)] | |
| 102. | In accordance with OAC rules 3745-55-99(A), (B) and Condition D.11 of the permit, has the permittee 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? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | If so, have the requirements of OAC rule 3745-54-17(B) been met? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

TANK SYSTEMS – WRITTEN ASSESSMENT REQUIREMENTS

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| 103. | In accordance with OAC rule 3745-55-92(A) and Condition D.3 of the permit, has the permittee obtained and submitted a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
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NOTE: Review the file to see if the written assessment has been previously reviewed and what the results were.

| | | |
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| | Does the written assessment include the following items: | |
| a. | Certification by a qualified professional engineer? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Consideration of the design standards of the system? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Consideration of the hazardous characteristics of the waste(s)? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d. | An evaluation by a corrosion expert (only if the external system/components are metal and in contact with soil or water)? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| e. | A determination of design and operational measures that will be needed to protect the tank system from potential damage (only for underground tank components)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| f. | Design considerations to ensure that the tank foundations will maintain the load of a full tank? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| g. | Design considerations for anchoring the unit to prevent floatation (only for tanks situated in a seismic fault zone or saturated zone)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| h. | Design considerations to ensure that the tank system will withstand the effects of frost heave (only for underground tank systems)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

NOTE: CO-DHWM Engineering staff are available to assist you with evaluation of the written assessment.

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| 104. | In accordance with OAC rule 3745-55-92(G) and Condition D.3(b) of the permit, are there written statements by those persons 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? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | Do the written statements address all of the following: | |
| a. | Inspection for damage and/or inadequate construction and installation was conducted? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Statement that deficiencies were corrected before the tank system was covered or put into use? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Proper backfilling? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| d. | Tightness test; if the tank system was found not to be tight, does the statement indicate that proper repairs were made? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| e. | Proper support and protection of ancillary equipment? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| f. | Supervision of the installation of field fabricated corrosion protection? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

TANK SYSTEMS – SECONDARY CONTAINMENT

| | | | | | |
|---|--|---|---|--|---|
| 105. | Has secondary containment been provided as required by OAC rule 3745-55-93(A)? [Condition D.4] | | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| <p><i>NOTE: Secondary containment must be provided for tank systems that store or treat materials that become hazardous wastes within two years after the hazardous waste listing, or when the system has reached 15-years of age, whichever comes later. [3745-55-93(A)(2)].</i></p> | | | | | |
| 106. | Has secondary containment been provided? | | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| | a. | An external liner as described in OAC rule 3745-55-93(E)(1)? If so, | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| | i. | Is liner designed or operated to contain 100% of the capacity of the largest tank? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| | ii. | Is liner designed and operated to prevent run-on and infiltration or the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| | iii. | Is liner free of cracks and gaps? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| | iv. | Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| | v. | Are chemically resistant water stops in place at all points? (concrete liners only) | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| | vi. | Is there a compatible interior coating or lining to prevent migration of waste into the concrete? (concrete liners only) | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| | b. | Vault system as described in OAC rule 3745-55-93(E)(2)? If so, | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| | i. | Is vault system designed to contain 100% of the capacity of the largest tank? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| | ii. | Is liner designed and operated to prevent run-on and infiltration or the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| | iii. | Are chemically resistant water stops in place at all points? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| | iv. | Is there a compatible interior coating to prevent migration into the concrete? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| | v. | For ignitable or reactive waste : Is the vault system provided with means to prevent (or alternatively "protect against") the formation or ignition of vapors? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| | vi. | Is vault system provided with an exterior moisture barrier? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| | c. | Double-walled tank as described in OAC rule 3745-55-93(E)(3)? If so, | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| | i. | <u>Is double-walled tank designed as an integral structure to contain any release from the inner tank?</u> | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| | ii. | If metal , are the primary tank interior and outer shell exterior surfaces protected from corrosion? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| | 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 <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| | d. | An equivalent device as described in OAC rule 3745-55-93(D)(4) which has been approved by the director? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |

| TANK SYSTEMS – SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION | | |
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| 107. | In accordance with OAC rules 3745-55-93(B)(1), (2) and Condition D.4 of the permit, has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, groundwater, or surface water and is it capable of <u>detecting</u> and <u>collecting</u> releases and accumulated liquids? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 108. | Does the secondary containment system meet the following minimum requirements of OAC rule 3745-55-93(C)?: [Condition D.4] | |
| a. | Constructed or lined with compatible materials of sufficient strength to prevent failure? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Placed on a foundation or base capable of providing support? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 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 the earliest practicable time? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d. | Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| TANK SYSTEMS – ANCILLARY EQUIPMENT REQUIREMENTS | | |
| 109. | In accordance with OAC rule 3745-55-93(F) and Condition D.4 of the permit, is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| | If not , is the ancillary equipment one of the following: | |
| a. | Above ground piping (exclusive of flanges, joints, valves and connections) that is inspected daily? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Welded flanges, welded joints and/or welded connections that is inspected daily? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Sealless or magnetic coupling pumps and/or sealless valves? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| d. | 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) that is inspected daily? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| TANK SYSTEMS – TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE | | |
| 110. | 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 permittee take the following actions as required by OAC rules 3745-55-96(A) through (E)?: [Conditions D.7(a), D.8(a) and (b)]: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| <i>NOTE: If the tank is found to be unfit for use, inspector should explain why.</i> | | |
| a. | Immediately cease flow of material into tank and investigate the cause of the release? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Remove waste from tank system to prevent further release within 24 hours of detection or at the earliest practicable time? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 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? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| d. | For a visible release to the environment, immediately conduct a visual inspection of the release? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

| | | |
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| e. | For a visible release to the environment, prevent further migration of the leak or spill to soils or surface waters? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| f. | For a visible release to the environment, properly dispose of any visibly contaminated soil or surface water? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| g. | Report any release to the environment to the director within 24 hours unless it was less than one pound and was cleaned up immediately? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| h. | For a release to the environment, submit a written report of the incident to the director within 30 days after the release? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| i. | Remediate the spill and repair the unit prior to returning it to service? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| j. | For a release from a tank system without secondary containment, did the permittee provide secondary containment meeting the requirements of OAC rule 3745-55-93 for the unit prior to putting it back into service? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

NOTE: The requirements noted in 108.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.

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| 111. | In the event that the repairs to the tank system were major (e.g., replacement of liner, repair of ruptured primary or secondary containment structure), did the permittee obtain a certification from a qualified professional engineer attesting that the repaired unit is capable of handling hazardous waste, as required by OAC rule 3745-55-96(F)? [Condition D.7(c)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 112. | Was a copy of the certification submitted to the director within seven days after returning the system to use, as required by OAC rule 3745-55-96(F)? [Condition D.7(c)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 113. | If the permittee was unable to repair and return the unit to service as described in Questions 110.i and 110.j, was the tank system closed in accordance with OAC rule 3745-55-97? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 114. | Does the permittee 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, did the permittee take following actions as required by OAC rule 3745-55-93(G)(3)? [Condition D.7(b)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Has the permittee complied with OAC rules 3745-55-96(A) through (F) and decontaminated soils? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | If soils cannot be decontaminated/removed, has the permittee complied with OAC rule 3745-55-97(B)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 115. | Does the permittee have a tank system with a variance from secondary containment from which a release occurred and <u>has</u> migrated from the zone of engineering control? If so, did the permittee take following actions as required by OAC rule 3745-55-93(G)(4)? [Condition D.7(b)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Has the permittee complied with OAC rules 3745-55-96(A) through (D), prevented migration, and decontaminated soil? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the permittee complied with OAC rule 3745-55-97(B)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

CONTAINMENT SYSTEM

| | | |
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| 116. | Does the permittee maintain the containment system as described in Section 4.2.3 of the approved permit application, including: [Condition C.7] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Sufficient capacity to hold 10% of the total volume of containers or the volume of the largest container, whichever is greater? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | A system which is free of gaps and sufficiently impervious to contain leaks and spills? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 117. | Has the permittee had a spill or leak of wastes? If so: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |

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|---|----|--|---|-----------------------------|---|
| | a. | Was spilled or leaked waste removed in a timely manner? [Condition C.7(e)] | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| <i>NOTE: This time period is not to exceed 24 hours. [Condition C.7(e)]</i> | | | | | |
| AISLE SPACE | | | | | |
| 118. | | Is the permittee maintaining adequate aisle space to allow unobstructed movement of personnel and equipment in the event of an emergency as required by OAC rule 3745-54-35 and Condition B.12 of the permit? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| INSPECTION ITEMS FROM THE PART B APPLICATION | | | | | |
| <i>NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.</i> | | | | | |
| LAND DISPOSAL RESTRICTION REQUIREMENTS | | | | | |
| <i>NOTE: In order to determine compliance with all applicable LDR requirements the inspector may need to complete the separate LDR TSD checklist:</i> | | | | | |
| 119. | | Does the permittee comply with all applicable regulations regarding land disposal prohibitions and restrictions as required by OAC Chapter 3745-270? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 120. | | Does the permittee comply with the notification and certification requirements of OAC rule 3745-270-07(A)? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 121. | | Does the permittee comply with the requirements of OAC rule 3745-270-03 and does not in any way dilute a restricted waste or treatment residue as a substitute for adequate treatment? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 122. | | Does the permittee retain supporting data used to determine if wastes managed at the facility are restricted from land disposal in the facility files as required by OAC rule 3745-270-07(A)(5)? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| | a. | Are copies of all notices, certifications, demonstrations, waste analysis and other documentation produced pursuant to OAC Chapter 3745-270 retained for a period of 3 years as required by OAC rule 3745-270-07(A)? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 123. | | Is the permittee in compliance with the requirements of OAC rule 3745-270-50 regarding the storage of wastes restricted or prohibited from land disposal under OAC rule 3745-270-50? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| INSPECTION ITEMS FROM THE PART B APPLICATION | | | | | |
| <i>NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.</i> | | | | | |
| CORRECTIVE ACTION | | | | | |
| 124. | | Has the permittee submitted the monthly progress report for all corrective action activities? (This report is due by the 15 th of the month following the reporting period.) [Condition _____] Ohio EPA's Division of Environmental Response and Revitalization (DERR) is responsible for overseeing corrective action and ground water monitoring activities at the facility. | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 125. | | Has the permittee identified any new WMUs or releases at the facility? [Condition E.10]? If so: | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| | a. | Did the permittee follow the steps indicated in Conditions E.10(a), (b) and E.11? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| INSPECTION ITEMS FROM THE PART B APPLICATION | | | | | |
| <i>NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.</i> | | | | | |

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

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

Safety Equipment Used:

GENERAL REQUIREMENTS

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| 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.

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| 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).

| | | |
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| 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 3745-66-100 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.

| | | |
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| 11. | Does the generator export hazardous waste? If so: | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Has the generator complied with special manifest requirements? [3745-52-54] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input 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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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| e. | Are export related documents being maintained on-site? [3745-52-57(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input 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)(1)] | 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)(1)]&[3745-52-27(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| <i>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)(1)]</i> | | |
| 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"/> |
| <i>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)]</i> | | |
| 15. | If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 16. | Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| <i>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.</i> | | |
| 17. | If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 18. | 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 19. | 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)] One load of hazardous waste (Manifest Tracking Number: 003417788FLE) was accepted by the transporter on March 11, 2011, and the manifest was signed by the designated facility (Essroc Materials Inc.) on June 3, 2011. Clean Harbors did not file an exception report with Ohio EPA for this shipment. Likewise, three loads of hazardous waste (Manifest Tracking Numbers: 003417787FLE, 003417789FLE, and 003417790FLE) were accepted by the transporter on March 14, 2011, and the manifests were signed by the designated facility (Essroc Materials Inc.) on June 3, 2011. Clean Harbors did not file exception reports with Ohio EPA for these shipments. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 20. | Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| <i>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.</i> | | |
| PERSONNEL TRAINING | | |
| 21. | 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 22. | 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)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]

| | | |
|-----|---|--|
| 23. | Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 24. | Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 25. | Does the generator provide annual refresher training to employees? [3745-65-16(C)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 26. | Does the generator keep records and documentation of: | |
| a. | Job titles? [3745-65-16(D)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Job descriptions? [3745-65-16(D)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Type and amount of training given to each person? [3745-65-16(D)(3)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d. | Completed training or job experience required? [3745-65-16(D)(4)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 27. | 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

CONTINGENCY PLAN

| | | |
|-----|--|--|
| 28. | 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 29. | 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Arrangements with emergency authorities? [3745-65-52(C)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d. | A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| e. | An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]

| | | |
|-----|--|--|
| 30. | 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 31. | 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 32. | Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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

| | | |
|-----|--|--|
| 33. | Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Was the contingency plan implemented? [3745-65-51(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| c. | Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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

| | | |
|-----|---|--|
| 34. | Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 35. | 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Emergency communication device? [3745-65-32(B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Portable fire control, spill control and decon equipment? [3745-65-32(C)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d. | Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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

| | | |
|-----|--|--|
| 36. | Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 37. | Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 38. | 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 39. | If there is only one employee on the premises, is there immediate access to a device (e.g., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 40. | Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 41. | Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 42. | Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

SATELLITE ACCUMULATION AREA REQUIREMENTS

| | | |
|-----|---|--|
| 43. | Does the generator ensure that satellite accumulation area(s): | |
| a. | Are at or near a point of generation? [3745-52-34(C)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d. | Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| e. | Containers are closed, in good condition and compatible with wastes | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

| | | | |
|-----|----|---|--|
| | | stored in them? [3745-52-34(C)(1)(a)] | |
| | f. | Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 44. | | Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| | 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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

| | | | |
|-----|----|--|--|
| 45. | | Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 46. | | Is the accumulation date on each container? [3745-52-34(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 47. | | Are hazardous wastes stored in containers which are: | |
| | a. | Closed (except when adding/removing wastes)? [3745-66-73(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. | In good condition? [3745-66-71] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | c. | Compatible with wastes stored in them? [3745-66-72] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | d. | Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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

| | | | |
|-----|----|---|--|
| 48. | | Is the container accumulation areas(s) inspected weekly? [3745-66-74] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | a. | Are inspections recorded in a log or summary? [3745-66-74] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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

| | | | |
|-----|--|---|--|
| 49. | | Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 50. | | 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 51. | | 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 52. | | 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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.

| | | | |
|-----|--|--|--|
| 53. | | 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|-----|--|--|--|

NOTE: Please provide a description of unit and documentation provided by generator for the file to demonstrate that closure was completed in accordance with 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 | | Yes | No | N/A |
|----------------------------|--|-------------------------------------|--------------------------|--------------------------|
| 54. | 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)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 55. | Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 56. | Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**GENERATOR LDR CHECKLIST
DOES NOT APPLY TO CESQGS**

GENERAL REQUIREMENTS

| | | |
|----|--|--|
| 1. | If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07(A)(7)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 2. | Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not, | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).

| | | |
|----|--|--|
| 3. | Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 4. | Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 5. | Does the generator generate a listed HW that exhibits a characteristic? If yes, | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.

| | | |
|----|---|--|
| 6. | Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|--|

NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.

NOTE: Written documentation of this determination is not required.

| | | |
|----|---|--|
| 7. | Did the generator treat his HW /soil on-site <u>to meet</u> the LDR treatment standard? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|----|---|--|

NOTE: If "Yes" see question #16.

| | | |
|------|--|--|
| 8. | Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include: | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| i. | Applicable HW codes? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| ii. | Manifest number of the first shipment to the TSD? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| iii. | A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination.?" | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 9. | Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 10. | Does the generator have a copy of the LDR notification form/notice on file? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

| NOTIFICATION FORM | | |
|--|---|--|
| 11. | Does the LDR Notification form contain the following information: | |
| a. | Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d. | A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| NOTE: A wastewater contains <1% by wt. total suspended solids (TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC. | | |
| e. | Designation of the waste subcategory when applicable? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories | | |
| f. | A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents. | | |
| g. | If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents. | | |
| PROHIBITED DILUTION | | |
| 12. | Is the HW treated by burning? If "No" go to #15. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 13. | Is the HW a metal-bearing HW? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03. | | |
| 14. | a. Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless one of the following conditions apply. [3745-270-03(c)] | |
| | i. Contains > 1% TOC? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | ii. Contains organic constituents or cyanide at levels greater than the UTS levels? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | iii. Is made up of combustible material e.g., paper, wood, plastic? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | iv. Has a reasonable heating value (e.g., > 5000 Btu)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | v. Co-generated with a HW that must be combusted? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 15. | Was the HW treated by wastewater treatment? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

| | | |
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| <i>NOTE: If "Yes", HW is improperly being treated by dilution.</i> | | |
| b. | Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| c. | Does the wastewater treatment process include a process to separate/recover the organic phase of the waste? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].

NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.

GENERATOR TREATMENT

| | | |
|-----|--|--|
| 16. | Does the generator treat to meet LDRs on-site? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| | Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building <u>to meet</u> the LDR treatment standard? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| | If "Yes"...complete the rest of the checklist. If "No"...stop...you are done. | |
| a. | Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: This is a laboratory analysis but it does not have to be kept by the generator.

| | | |
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| c. | Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d. | Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| e. | Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| f. | Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTIFICATION FORM FOR GENERATOR TREATMENT

| | | | |
|-----|------|---|---|
| 17. | a. | Contains all information in #11 a-g above and | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. | If the treated HW/soil is listed.....notification contains the following certification statement: "I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment." | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | c. | If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator: | |
| | i. | Prepare a one-time notification? [3745-270-09 (D)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | ii. | Maintain a copy of the notice onsite? [3745-270-09(D)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | iii. | include in the notification: [3745-270-09(D)] | |
| | 1. | Name & address of receiving landfill? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | 2. | Description of HW when generated? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | 3. | HW code when generated? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

| | | | | | | |
|--|--|-----|---|------------------------------|-----------------------------|------------------------------|
| | | 4. | Treatability group when generated? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| | | 5. | Underlying hazardous constituents present when generated? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| | | iv. | Contain the certification statement as required by 3745-270-07(B)(4)? | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

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) = less than 5,000 Kg

PROHIBITIONS

- | | | |
|----|---|--|
| 1. | Did the SQUWH dispose of universal waste? [3745-273-11(A)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 2. | Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES

- | | | |
|----|---|--|
| 3. | Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] At the time of the inspection, Clean Harbors was not accumulating any universal waste batteries on site. | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 5. | Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 6. | If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| a. | If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 7. | Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

UNIVERSAL WASTE LAMPS

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| 8. | Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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 rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.

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

ACCUMULATION TIME

- | | | |
|-----|--|--|
| 11. | Is the waste accumulated for less than one year? [3745-273-15(A)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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| | handler to demonstrate) [3745-273-15(B)] | |
| <i>NOTE: Accumulation is defined as date generated or date received from another handler.</i> | | |
| 12. | Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below: Marking or labeling the container with the earliest date when the universal waste became a waste. | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| RESPONSE TO RELEASES | | |
| 14. | Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 15. | Is the material released characterized? [3745-273-17(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 16. | If the material released is a hazardous waste, was 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 OAC Chapter 3745-52) [3745-273-17(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| OFF-SITE SHIPMENTS | | |
| <i>NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.</i> | | |
| 17. | Are universal wastes sent to another handler, destination facility or foreign destination? [3745-273-18(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 18. | Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180. | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 19. | Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 20. | Has the originating handler ever had an off-site shipment rejected by another handler or destination facility? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 21. | If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u> : | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| a. | Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 22. | If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| EXPORTS | | |
| 23. | Is waste being sent to a foreign destination? If so: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| c. | Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |