



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
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Eval 117

Ent. 054

November 17 2011

Certified Mail

Mr. Steve Bley
Facility Compliance Manager
Spring Grove Resource Recovery, Inc.
4879 Spring Grove Avenue
Cincinnati, Ohio 45232

**RE: COMPLIANCE EVALUATION INSPECTION
SPRING GROVE RESOURCE RECOVERY – OHD000816629
Notice of Violation**

Dear Mr. Bley:

On August 19, 2011, Ohio EPA conducted a compliance evaluation inspection of Spring Grove Resource Recovery, Inc's (SGRR) Cincinnati, Ohio facility. Steve Vasse and you represented SGRR during the inspection. Jeff Smith and I represented the Ohio EPA. The purpose of the inspection was to determine SGRR's compliance with Ohio's hazardous waste laws and regulations as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC) and SGRR's Ohio hazardous waste installation and operation permit issued September 30, 2002. Ohio EPA's inspection included an inspection of facility operations and a review of written documentation. Compliance with the Ohio hazardous waste rules and the conditions of SGRR's permit addressing financial requirements were not assessed during this inspection.

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Based on the inspection, Ohio EPA has determined that SGRR has violated the following state hazardous waste regulations and conditions of its Ohio hazardous waste installation and operation permit. All violations of SGRR's permit are violations of ORC 3734.11(B).

1. **Duty to Comply, Condition A.5 and OAC 3745-50-58(A)**: The Permittee shall comply with all applicable provisions of ORC Chapter 3734, all applicable Ohio hazardous waste rules, and all terms and conditions of this permit, except to the extent and for the duration such noncompliance is authorized by the laws of the State of Ohio. Any permit noncompliance, other than noncompliance authorized by the laws of the State of Ohio, constitutes a violation of ORC Chapter 3734 and the rules adopted thereunder and is grounds for enforcement action, suspension, revocation, modification, revision, denial of a permit renewal application or other appropriate action.

2. **General Waste Analysis Plan, Condition B.3 and OAC 3745-54-13**: The Permittee shall follow the procedures described in the approved waste analysis plan found in Section C of the approved Part B permit application and the terms and conditions of this permit.

During the inspection, we randomly selected nine (9) profile numbers from waste drums stored on-site at SGRR and requested copies of the profile information required by SGRR's permit.

Based on the initial review of the profiles conducted during the inspection, three (3) profiles had the appropriate information: MTA-007; 50017102; and CH185075. On September 9, 2011, I requested additional information for the remaining six (6) profiles. On October 5, 2011, you provided additional information. The additional information cleared up questions on three (3) of the six (6) profiles: HSRFDP6141; BAE-112; CH2276045.

The following are issues found with the remaining three (3) profiles: CH504872; CC24938-SP; and LCCRN:

- A) Profile CH504872 is for sulfuric acid solids from a spill cleanup. The generator knowledge on the profile is listed as "generator knowledge." When I asked for specific generator knowledge information, SGRR's response was, "In our opinion this accurately describes the waste as generated. Nothing additional was provided by the generator." The profile provides no

information on where the sulfuric acid spill came from. With no additional information requested from the generator, SGRR has no idea whether the sulfuric acid was from a product spill or from a manufacturing process. If the sulfuric acid was from a manufacturing process like anodizing aluminum parts, then there is a concern that the waste could be hazardous for metals. SGRR does not screen for metals during its waste acceptance process so there would be no way to catch this. The generator knowledge should explain where the sulfuric acid spill came from.

- B) Profile CC24938-SP is a profile for Hysol/Superior30/SureFloFlux. The process generating the waste is listed as Lab Waste – Varies. The generator knowledge on the profile is listed as labpacking chemicals, MSDS, product labels. There was a lab pack inventory sheet attached with the profile. However, there were no MSDS available for the chemicals. The Central Profile Group (CPG) did not collect any MSDS from the generator when establishing the profile. The MSDS were not collected until after I requested them on September 9, 2011. SGRR's Permit Application, Section C, 2.2, pages C-11 and 12, states in part "SGRR will collect the following information for profiles using generator knowledge: 2) MSDS, if applicable."

CPG has recently implemented changes to the profiling process with the goal of ensuring the appropriate profile information is collected in compliance with SGRR's permit. Part of the new system was to ensure that MSDS information is collected when a profile is created. Profile CC24938-SP was created under CPG's new profiling system, but CPG failed to collect the MSDS.

- C) Profile LCCRN is a generic profile with a waste description of labpack non-hazardous for incineration. The process generating the waste is listed as Varies – Lab Packs. The waste stream was improperly manifested and should have been a specific profile (CH527380) for the generator. A copy of Profile CH527380 was provided and the profile was acceptable.

The non-hazardous LCCRN profile has approximately 660 chemicals listed as potential lab packed waste. Three (3) chemicals are P listed hazardous wastes (epinephrine, P042; phenylmercuric acetate, P092; and potassium cyanide, P098). The initial reason given for the P listed wastes on the non-hazardous profile was that they "would be below regulated amounts." I explained that containers of P listed wastes are only considered empty after

having been tripled rinsed by a solvent capable of removing the waste. After contacting CPG, SGRR later responded that the P listed wastes would not be the sole active ingredient. Not being the sole active ingredient would remove the P listing from the waste. However, there is nothing on the profile that details epinephrine, phenylmercuric acetate, and potassium cyanide as acceptable only if they are not the sole active ingredient in their respective waste streams. The profile lists only ranges which are acceptable for each chemical: epinephrine – 0.0 – 0.05%; phenylmercuric acetate – 0.0 – 0.13 ppm; potassium cyanide – 0.0 -0561 ppb. This ambiguity could lead any generator using this generic profile to include P listed hazardous wastes in with non-hazardous wastes.

As stated above, CPG implemented new procedures to ensure appropriate profile information is collected for wastes going to SGRR. Two profiles reviewed (CC24938-SP and CH527380) were created under the new system. Only one (1) had the appropriate information in compliance with SGRR's permit. SGRR needs to ensure that CPG is collecting generator information in compliance with SGRR's permit.

Because the CPG fails to properly collect and maintain information required by SGRR's permit, SGRR is in violation of Condition A.5 (OAC 3745-50-58(A)) and Condition B.3 (OAC 3745-54-13).

To return to compliance provide updated copies of profiles CH504872 and LCCRN. No additional information is required for profile CC24938-SP. Submit the updated profiles to this office within fourteen (14) days of receipt of this letter.

Additional inspections will be conducted prior to SGRR's permit renewal submittal which is due 180 days (April 3, 1012) prior to SGRR's permit expiration on September 30, 2012. The purpose of the inspections will be to make further determinations on the whether CPG's new profiling procedures are in compliance with SGRR's permit.

Enclosed is a copy of the checklist completed as a result of the inspection. If you have any questions, please either e-mail me at cathy.altman@epa.ohio.gov or call me at (937) 285-6093.

Sincerely,

A handwritten signature in cursive script that reads "Cathy L. Altman".

Cathy L. Altman
Division of Materials and Waste Management

ec: DMWM Data Entry/Facility File
Tammy Heffelfinger, DMWM, CO
Elissa Miller, Legal, CO

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PS Form 3800, June 2002

See Reverse for Instructions

STEVE BLEY
FACILITY COMPLIANCE MANAGER
SPRING GROVE RESOURCE RECOVERY INC
4879 SPRING GROVE AVE
CINCINNATI OH 45232

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

FACILITY	Spring Grove Resource Recovery, Inc.	OHIO PERMIT #	53-31-0012
STREET ADDRESS	4879 Spring Grove Avenue	US EPA ID#	OHD000816629
CITY, STATE AND ZIP CODE	Cincinnati, Ohio 45232	PHONE NUMBER	(513) 681-5738
COUNTY	Hamilton	INSPECTION DATE	August 19, 2011

Was Advance Notice of Inspection Given? Yes No N/A

If So, How Far In Advance?

	NAME	AGENCY/TITLE	PHONE
INSPECTORS	Cathy Altman	Ohio EPA	(937) 285-6093
	Jeff Smith	Ohio EPA	(937) 285-6070
FACILITY REPS	Steve Bley	SGRR	(513) 681-5738
	Steve Vasse	SGRR	

Is facility operating as a generator? Yes

PERMIT STATUS

Permit Issued:	September 30, 2002	Permit Expiration Date:	September 30, 2012
Permit Effective Date:	September 30, 2002	Permit Renewal Date::	April 3, 2012

AUTHORIZED ACTIVITIES

STORAGE AND TREATMENT

Container storage: 150,000 gallons – 2,727 units

Container treatment: 80,800 gallons/day, 2 short tons/day – compaction in containers, 10 short tons/day – shredder

Tank storage and treatment: 75,450 gallons in 8 tanks

GENERAL COMMENTS:

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1.	Is SGRR storing hazardous waste only in the 9 permitted container storage areas? [Condition C.1]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Has SGRR exceeded the one year storage limit? [Condition C.4]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Has SGRR sent all High Hazard waste off-site within 6 months in accordance with Section C?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Any hazardous waste onsite with an accumulation date over 6 months? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Has SGRR reviewed and re-evaluated the waste in accordance with Section C of the application?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
5.	Is SGRR storing hazardous wastes only in the types and size of containers specified in Section D of the application? [Condition C.1.a]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	Is each container in storage clearly marked to identify its contents and the date each period of storage began? [Condition C.4]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers holding hazardous waste in good condition? [Condition C.5]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If not, did SGRR transfer the waste to a container that is in good condition or otherwise manage the waste in compliance with the permit and OAC 3745-55-71? [Condition C.5]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
8.	Does SGRR ensure that all containers used at the facility are compatible with the hazardous waste stored in them? [Condition C.6]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Are incompatible wastes stored separately? [Condition C.13]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	Does SGRR keep all containers closed during storage except when adding or removing waste? [Condition C.7.b]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
11.	Have all lab pack wastes been packaged in drums containing absorbent that is compatible with the waste?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	Is SGRR maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment? (Minimum 2 ft b/w pallets of drums, wider in main aisles) [Condition B.12]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Are containers stacked according to the application? (bulk totes, cu yd boxes – stacked 2 high; drums – not to exceed 3 high, pallet b/w each stack, 4 drums on bottom pallet before 2 nd level added; boxes, cans, pails – variable based on strength and stability) [Condition C.7.a]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
14.	Is the containment system free of cracks and gaps, and sufficiently impervious to contain leaks and spills? [Condition C.8]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	Has there been a spill or leak of wastes or an accumulation of precipitation in the containment system? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Did removal exceed 24 hours from the time the spilled and/or leaked waste was discovered?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	Does SGRR continue to maintain the 24 hour surveillance system according to Section F of the application? [Condition B.4]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
17.	Is the fence surrounding the facility in good condition in accordance with Section F of the application? [Condition B.4]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Are warning signs (Danger – Unauthorized Personnel Keep Out) present at intervals along the fence in accordance with Section F of the application? [Condition B.4]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Is SGRR using pallets that are in good condition? [Condition B.1.a]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

20.	Is SGRR, at a minimum, maintaining the equipment set forth in Section F and G of the application? [Condition B.9]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
21.	Does SGRR store containers of ignitable or reactive wastes greater than 50 feet from the property line? [Condition C.12.a]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	Does SGRR take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and follow the procedures as specified by 3745-54-15 and Section F of the application including: [Condition C.12.b]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Providing electrical grounding? [Condition B.7.b]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Provide and require the use of spark proof tools? [Condition B.7.c)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Prohibit smoking and open flames and post appropriate signs? [Condition B.7.d]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
GENERATOR STANDARDS		
23.	Does SGRR comply with generator storage (90-days)? [OAC 3745-52-34]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
24.	Does SGRR comply with satellite accumulation for LQG? [OAC 3745-52-34]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
25.	Does SGRR comply with universal waste labelling requirements? [OAC 3745-273-34]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
26.	Does SGRR comply with universal waste management requirements? [OAC 3745-273-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RECORD KEEPING		
INSPECTIONS		
27.	Is SGRR following the approved inspection procedures and schedule for inspecting: monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment? [Condition B.5]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
28.	Does SGRR remedy deterioration or any malfunctions discovered by an inspection? [Condition B.5]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	Is SGRR maintaining records of all inspections for a minimum of 3 years? [Conditions A.27.c & B.5]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
30.	Do inspection records contain the following information: [Condition B.5]	
a.	Date and time of inspection?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Signature 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"/>
31.	Is SGRR inspecting the container area daily for accumulation of waste, leaking or structurally impaired containers, labelling, aisle space, stacking and closed containers in accordance with Section F of the application? [Condition C.10]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
32.	Are the inspections noted in the inspection log along with any remedial action taken? [Condition C.10]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
33.	Is SGRR inspecting the following components of the tank system: [Condition D.5]	
a.	Overfill controls?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	b.	Above ground portions of the tank system to detect corrosion or leaks?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Construction materials and area immediately surrounding the tank, including secondary containment, to detect erosion or signs of releases?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	Reviewing data gathered from monitoring and leak detection equipment to ensure that the systems are operating according to design specifications?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
34.		Is SGRR maintaining documentation of the tank system inspections in the operating log? [Condition D.5.d]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
35.		Does SGRR prevent the placement of incompatible wastes in the tank and document compliance? [Condition D.10]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
36.		Does SGRR prevent the placement of ignitable or reactive waste in the tank system, unless proper procedures are followed? [Condition D.9]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

MANIFESTS

37.		Is all hazardous waste shipped from the facility by a registered transporter? [Condition A.16]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
38.		Have all hazardous wastes been shipped off-site with a completed manifest? [Condition B.24]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
39.		Do all manifests contain the required information? [Condition B.24]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
40.		Has SGRR received a return copy of each manifest within 35 days? [Condition B.24.b]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	If not, did SGRR submit an exception report?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
41.		Has a significant discrepancy occurred since the last inspection? [Condition B.24.b]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	a.	If not reconciled within 15 days, was a discrepancy report submitted?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
42.		Has SGRR accepted any unmanifested waste? [Condition B.24.c]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	If so, did SGRR submit an unmanifested waste report within 15 days of receipt of the waste?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
43.		Does SGRR maintain copies of manifests and exception reports for at least 3 years? [Condition B.24]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
44.		Has SGRR received any waste from a foreign source without notifying the Director in writing at least 4 weeks in advance? [Condition B.2.a]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
45.		Is SGRR informing generators that the facility has the appropriate permit to accept a waste and maintaining documentation of the notice? [Condition B.2.b]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

PERSONNEL TRAINING

46.		Is SGRR conducting personnel training in accordance with Section H, including instruction in safe equipment operation, emergency procedures, and implementation of the Contingency plan? [Condition B.6]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
47.		Does SGRR provide training to new employees within 6 months from date of employment, along with an annual refresher? [Condition B.6]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
48.		Is SGRR maintaining personnel training records? [Condition B.6]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

CONTINGENCY PLAN

49.		Have there been any changes at SGRR requiring update to the plan?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
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	[Condition B.17]	
50.	Is SGRR reviewing the plan and updating it as needed? [Condition B.17]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
51.	Is an emergency coordinator available at all times with the authority to commit resources? [Condition B.19]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
52.	Has there been a fire, explosion or release of hazardous waste at the facility since the last inspection? [Condition B.14]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Did SGRR comply with the emergency procedures in the plan? [Condition B.14]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b. Did SGRR submit an incident report to the Director within 15 days?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c. Did SGRR record the incident in the operating record? [Condition B.22]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
PERMIT MODIFICATION, REVISION, REVOCATION		
53.	Has SGRR made any or plans any changes that would require a modification? [Conditions A.2 & A.15]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
54.	Has there been a change in owner/operator? [Condition A.18]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
55.	Has SGRR identified any instances of noncompliance?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
56.	Is SGRR retaining a complete copy of the approved application on-site? [Condition A.14.c]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
OPERATING RECORD		
57.	Is SGRR maintaining a written operating record at the facility which contains the following element: [Condition B.22]	
	a. A description and the quantity of each hazardous waste received?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Method(s) and date(s) of treatment, storage or disposal at the facility?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. The location of each hazardous waste within the facility and the quantity at each location?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
58.	Is SGRR maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents: [Condition A.28]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Waste analysis plan?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Contingency plan?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Closure plan?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. Cost estimate for facility closure?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e. Personnel training plan and records?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	f. Inspection schedules?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
CLOSURE REQUIREMENTS		
59.	Has SGRR closed the facility or any portion of the facility?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

STORAGE OF HAZARDOUS WASTES IN CONTAINERS		
60.	Does SGRR limit the total quantity of containerized waste in the container storage area to 150,000 gallons at any given time? [Condition C.1.a]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
61.	Does SGRR limit the total quantity of waste treated in containers to no more than a maximum of 10,000 gallons per day? [Condition C.1.a]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
TANK SYSTEM REQUIREMENTS		
62.	Is SGRR limiting the total volume of waste managed in the tank system to the maximum volume for each tank as authorized by Condition D.1?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
63.	Does SGRR store and treat in tanks only those hazardous waste codes specified in the permit application and as listed on Attachment I of the permit? [Condition D.1.c]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
64.	Has a leak or spill occurred from the tank system?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
65.	Does SGRR conduct annual leak testing? [Condition D.3]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
LAND DISPOSAL RESTRICTIONS		
66.	Does SGRR comply with all applicable regulations regarding land disposal prohibitions and restrictions as required by OAC 3745-270?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
67.	Does SGRR comply with the notification and certification requirements as required by OAC 3745-270-07(A)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
68.	Does SGRR comply with OAC 3745-270-03 by not diluting 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"/>
69.	Does SGRR retain supporting data as required by OAC 3745-270-07(A)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
WASTE ANALYSIS PLAN		
70.	Does SGRR follow procedures described in the approved waste analysis plan in Section C as required by OAC 3745-54-13? [Condition B.3]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
71.	Does SGRR comply with all applicable provisions of ORC Chapter 3734, all applicable Ohio hazardous waste rules, and all terms and conditions of its permit as required by OAC 3745-50-58(A)? [Condition A.5]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>