



**Environmental
Protection Agency**

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

December 14, 2011

**GUERNSEY COUNTY
AMG VANADIUM CORP
DMWM/SEDO
OHD042319244**

Mr. Richard Caldwell
AMG Vanadium Inc.
60790 Southgate Road
Cambridge, Ohio 43725

Dear Mr. Caldwell:

On December 5 and 6, 2011, I inspected AMG Vanadium's ("AMG") Cambridge facility to determine compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code, Chapter 3745. of the Ohio Administrative Code (OAC), and the Variance from Classification as a Waste which was issued on November 18, 2008. In addition, compliance with the Ohio Hazardous Waste Facility Installation and Operation permit issued on May 6, 2008 was evaluated.

I found the following violation of AMG's Variance from Classification as a Waste:

- 1. General Conditions V(2)(c)(i):** AMG must store Reclaimed Catalyst (K171/K172) that contains free liquids in containers in the Raw Material Storage Building.

AMG stored approximately 150 gallons of free liquids that had settled out from Reclaimed Catalyst during rail car shipment in a container in the Mill Building for up to 30 days until it was recycled back into Reclaimed Catalyst in the Feed Building.

This violation was abated prior to the inspection. Therefore, no further action is required.

GENERAL COMMENTS

- (a) Please insure that a grate suitable for decontamination of employee's footwear is accessible at the door of the Wash Building.
- (b) The "man door" on the north side of the Feed Building should either be locked or provided with decontamination equipment.

Mr. Richard Caldwell
AMG Vanadium Inc.
December 14, 2011
Page 2

- (c) During the inspection, we discussed the use of alternatives to solvent-based parts washers. The following link to the "*Ohio EPA Hazardous Waste Notifier*" contains a comprehensive article titled "*Save Money by Reducing Waste From Stand-alone Solvent-based Parts Washers*" that includes recommendations for parts washer alternatives, brief case studies and links to on-line vendor data bases. If you still have questions or would like recommendations after reviewing this material, please feel free to contact the Ohio EPA Office of Compliance Assistance and Pollution Prevention (OCAPP) at 614-644-3469 for further information.

<http://epa.ohio.gov/portals/32/pdf/NotifierSummer05.pdf>

Enclosed you will find a copy of the checklists that were completed during the inspection. Should you have any questions, feel free to contact me at (740) 380-5293. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/opp>.

Sincerely,



Donna Goodman
Inspector
Division of Materials and Waste Management

DG/mlm

Enclosures

NOTICE:

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

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

| | | | |
|---------------------------------|-----------------------|------------------------|----------------------|
| FACILITY | AMG Vanadium | OHIO PERMIT # | |
| STREET ADDRESS | 60790 Southgate Road | US EPA ID# | OHD042319244 |
| CITY, STATE AND ZIP CODE | Cambridge, Ohio 43725 | PHONE NUMBER | 740-432-6345 |
| COUNTY | Guernsey | INSPECTION DATE | June 24 and 30, 2011 |

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

If So, How Far In Advance? _____

| | NAME | AGENCY/TITLE | PHONE |
|----------------------|------------------------------------|---------------------|--------------|
| INSPECTORS | Donna Goodman | OEPA Inspector | 740-380-5293 |
| FACILITY REPS | Richard Caldwell and Susan Harrier | AMG | 740-432-6345 |

Is facility operating as a generator? YES
If so, complete the applicable sections of the Generator Requirements checklist for wastes being managed under generator status.

PERMIT STATUS

| | | | |
|------------------------------|-------------------------|-------------------------------|--|
| Permit Issued: | May 6, 2008 | LDR Checklist Attached: | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| Permit Effective Date: | May 6, 2008 | Used Oil Checklist Attached: | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| Permit Expiration Date: | May 6, 2018 | Generator Checklist Attached: | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| Permit Renewal Date: | | | |
| Permit Modification Date(s): | 6/30/08;7/30/08;8/19/08 | | |

AUTHORIZED ACTIVITIES

| | STORAGE | TREATMENT | DISPOSAL |
|---|----------------------|-------------------|---------------------|
| | Containers | Tanks | Injection Well |
| | Tanks | Incinerator | Landfill |
| | Waste Pile | Thermal Treatment | Land Application |
| x | Containment Building | Post-Closure | Surface Impoundment |

Post-Closure Care Corrective Action

Table of Contents

| | |
|--|----|
| GENERAL PERMIT COMPLIANCE AND ACTIVITIES | 3 |
| PERMIT MODIFICATION, REVISION, REVOCATION | 4 |
| SITE ENTRY - AVAILABILITY OF RECORDS | 5 |
| INSPECTION ITEMS FROM PART B APPLICATION | 5 |
| RECORDKEEPING/OPERATING REQUIREMENTS | 5 |
| OPERATING RECORD | 5 |
| DOCUMENTS TO BE MAINTAINED AT FACILITY | 5 |
| ANNUAL REPORT REQUIREMENT | 6 |
| SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS | 6 |
| INSPECTION ITEMS FROM THE PART B APPLICATION | 7 |
| WASTE MINIMIZATION REQUIREMENTS | 7 |
| GROUND WATER MONITORING | 7 |
| INSPECTION ITEMS FROM THE PART B APPLICATION | 7 |
| WASTE ACCEPTANCE AND GENERATION | 7 |
| INSPECTION ITEMS FROM THE PART B APPLICATION | 8 |
| OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS | 8 |
| WASTE ANALYSIS/WASTE ANALYSIS PLAN | 9 |
| INSPECTION ITEMS FROM THE PART B APPLICATION | 9 |
| GENERAL INSPECTION REQUIREMENTS | 9 |
| INSPECTION ITEMS FROM THE PART B APPLICATION | 10 |
| SECURITY REQUIREMENTS | 10 |
| FACILITY OPERATIONS | 10 |
| INSPECTION ITEMS FROM THE PART B APPLICATION | 10 |
| PERSONNEL TRAINING | 10 |
| INSPECTION ITEMS FROM THE PART B APPLICATION | 11 |
| REQUIRED EQUIPMENT | 11 |
| INSPECTION ITEMS FROM THE PART B APPLICATION | 11 |
| CONTINGENCY PLAN - EMERGENCY PROCEDURES | 11 |
| IMPLEMENTATION OF CONTINGENCY PLAN | 13 |
| INSPECTION ITEMS FROM THE PART B APPLICATION | 14 |
| CLOSURE REQUIREMENTS | 14 |
| POST-CLOSURE MAINTENANCE | 14 |
| INSPECTION ITEMS FROM THE PART B APPLICATION | 15 |
| STORAGE OF HAZARDOUS WASTES IN CONTAINERS | |
| CONDITION OF CONTAINERS | |
| INSPECTIONS | |
| CONTAINMENT SYSTEM | |
| AISLE SPACE | |
| INSPECTION ITEMS FROM THE PART B APPLICATION | 15 |
| LAND DISPOSAL RESTRICTION REQUIREMENTS | 15 |
| INSPECTION ITEMS FROM THE PART B APPLICATION | 16 |
| CORRECTIVE ACTION | 16 |

| 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.25] | | 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 facility 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 facility 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. Name and quantity of material(s) involved? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | | D. The extent of injuries, if any? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | | E. 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"/> |
| | | F. 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 five 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"/> |
| <p><i>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].</i></p> | | | |

| | | |
|--|---|--|
| 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? AMG temporarily stored spent catalyst from an offsite source in areas other than the permitted RMSB in order to resolve shipping delays. This was done with the written approval of DHWM (see April 2, 2010 OEPA letter to AMG). Due to variance, spent catalyst is not classified as a hazardous waste. | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | If so, has the facility provided Ohio EPA with advance notice of such changes? [Condition A.17] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| <i>NOTE: Such notification does not waive the permittee's duty to comply with the permit. [Condition A.17]</i> | | |
| 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 | | |
| 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 type="checkbox"/> No <input checked="" 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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input 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: The construction of a second RMSB, to be permitted, has begun. A Class 3 permit modification is | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

| | | |
|----|--|--|
| | being prepared by the company for submittal to OEPA. | |
| a. | Has the permittee given notice to the director of such alterations/additions? [Condition A.15] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

SITE ENTRY - AVAILABILITY OF RECORDS

| | | |
|-----|--|--|
| 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 questions pertaining to the permittee's application, as appropriate.

RECORDKEEPING/OPERATING REQUIREMENTS

OPERATING RECORD

| | | |
|-----|---|--|
| 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

| | | |
|-----|--|--|
| 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"/> |
| | 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(C)? [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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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 three 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 12(a)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

| | | |
|-----|---|--|
| | 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"/> |
| 27. | Has Ohio EPA requested submittal of any reports or other information from the permittee? If so: | Yes <input type="checkbox"/> No <input checked="" 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(c)] | 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.

WASTE MINIMIZATION REQUIREMENTS

| | | |
|-----|---|---|
| 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) and OAC rule 3745-54-73? | 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 <u>Southeast</u> District Office within 180 days of journalization of this permit and updates biennially thereafter? [Condition A.29] Next due in November 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? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| | If so, what amount of waste has the permittee reduced this year? In 2010, there was not a significant amount of waste reduced. | This information to be collected once per year (2011 figures will be due at 4 th quarter 2012 inspection.) |
| 31. | Has the permittee's company saved much money this year by implementing pollution prevention (reducing raw material usage, disposal fees, energy savings, etc.)? See comment above. | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | If so, how much money has the permittee's company saved this year? NA | This information to be collected once per year (2011 figures will be due at 4 th quarter 2012 inspection) |

NOTE: If this facility is inspected two times a year, the information obtained in questions 3 & 4 only needs to be collected one time for the calendar year.

GROUND WATER MONITORING

| | | |
|-----|---|--|
| 32. | Has the permittee conducted semi-annual sampling of their monitoring wells? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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? | 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.

WASTE ACCEPTANCE AND GENERATION

| | | |
|-----|---|--|
| 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 director at least four weeks prior to the date | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

the permittee expects to receive hazardous waste from a foreign source, as required by OAC rule 3745-54-12(A)? [Condition B.2(a)]

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.

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 three years at the facility as required by OAC rules 3745-52-40 and 3745-54-71(A)(5)? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: If the permittee is generating hazardous waste, remember to attach a complete generator checklist.

| | | |
|-----|---|--|
| 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"/> |
|-----|---|--|

TRANSPORTERS:

| | | |
|-----|--|--|
| 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 three years? [3745-54-71(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| a. | If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met? [3745-54-71(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Are any significant discrepancies in the manifest, as defined in 3745-54-72(A) noted in writing on the manifest document? | 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 3745-54-72(B)? If not: | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| a. | Has the owner/operator submitted the required information to the director? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 42. | If the facility 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 3745-54-76(A) been submitted to the director within 15 days? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

| WASTE ANALYSIS/WASTE ANALYSIS PLAN | | |
|--|---|--|
| 43. | 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, 3745-218 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"/> |
| 44. | Does the permittee follow the procedures described in the WAP [Condition B.3(b)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 45. | 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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 46. | 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"/> |
| 47. | FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER OAC 3745-270-04(A): | |
| | Does the waste analysis plan include procedures and schedules for: | |
| | i. The sampling of impoundment contents? [3745-54-13(B)(7)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | ii. The analysis of test data? [3745-65-13(B)(7)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | iii. 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 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"/> |
| 48. | Where applicable: The methods which will be used to meet additional waste analysis requirements for specific waste management methods specified in rules 3745-54-17, 3745-57-14, 3745-57-41 and 3745-270-07 of the OAC? [3745-54-13(B)(6)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 49. | 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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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> | | |
| 50. | Is the permittee following the inspection procedures and schedules as set forth in the permit 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"/> |
| 51. | 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? [OAC rule 3745-54-15(B)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 52. | 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"/> |
| 53. | 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

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

SECURITY REQUIREMENTS

| | | |
|-----|--|--|
| 54. | Is the permittee complying with the following security provisions of OAC rule 3745-54-14 and Condition B.4 of the permit: | |
| 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"/> |
| 55. | 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 RMSB? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

FACILITY OPERATIONS

| | | |
|-----|---|--|
| 56. | Is construction, maintenance and operation of the facility being conducted to minimize the possibility of a fire, explosion, or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, ground or surface water? [OAC rule 3745-54-31; Condition B.1] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 57. | 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

| | | |
|-----|--|--|
| 58. | 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. | The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

| | | | |
|-----|----|--|--|
| | | implementation of the contingency plan? [OAC rule 3745-54-16(A)(B)(C)] | |
| | b. | The facility provides personnel training to new employees within six months after their date of employment as required by OAC rule 3745-54-16(B)? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | c. | The facility provides 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"/> |
| 59. | | Is the permittee maintaining personnel training records as required by OAC rule 3745-54-16(D) and of the approved application, including: written job titles, job descriptions and documented employee training records? [Condition B.6] | Yes <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 ___.

| | | | |
|-----|----|---|--|
| 60. | | 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 extinguishes 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"/> |
| 61. | | Is the permittee inspecting, testing and maintaining the equipment specified in Question No. 60 to ensure its proper operating in accordance with OAC rule 3745-54-33 and Condition B.10 of the permit? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 62. | | 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

| | | | |
|-----|----|---|--|
| 63. | | In compliance with Condition B.13 of the permit and OAC rule 3745-54-37(A) and (B), 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"/> |
| 64. | | Has a state or local agency declined to enter into the arrangements set | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |

| | | |
|--|---|--|
| | forth in OAC rule 3745-54-37(A)? If so | |
| | a. Has the permittee documented the refusal in the operating record as required by OAC rule 3745-54-37(B)? [Condition B.13(b)] | |
| 65. | 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"/> |
| 66. | Has the permittee notified all parties identified in the contingency plan in writing of amendments, modifications, or revisions to the plan within ten 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"/> |
| 67. | Has the permittee submitted a copy of the approved contingency plan and all revisions, amendments and modifications to the Ohio EPA, Division of Emergency and Remedial Response (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"/> |
| 68. | 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 No. 4 of <u>Recordkeeping Requirements</u> to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51. | | |
| EMERGENCY COORDINATOR | | |
| 69. | 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"/> |
| 70. | 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? | |
| | c. Waste characterization and location? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | 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"/> |
| 71. | 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"/> |
| 72. | Does the permittee have a contingency plan for the facility that: [Condition B.19] | |
| | 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. 72(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 evaluation 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"/> |
| IMPLEMENTATION OF CONTINGENCY PLAN | | | |
| 73. | | Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents at the facility including spill or release of hazardous waste or hazardous waste constituents greater than or equal to 55 gallons; any spill or release of hazardous waste or hazardous waste constituents less than 55 gallons may result in a fire or explosion hazard as determined by the Emergency Coordinator; or any spill on-site that may potentially cause on or off-site soil and/or ground or surface water contamination; any spill or release of hazardous waste or hazardous waste constituents that is reported to the National Response Center or local (city or county) emergency response center because the spill exceeded the "RQ" limits; any fire involving hazardous waste; any explosion involving hazardous waste; since the date of the last inspection? If so: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| | 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: [OAC rule 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"/> |
| | 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 of 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(J)? [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(J)? [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

74. Does the permittee maintain the approved closure plan at the facility?
[Condition B.29] Yes No N/A

75. 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 No N/A

76. 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 No N/A

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

77. 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, as required by Condition B.31 of the permit? Yes No N/A

b. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26] Yes No N/A

c. Did the permittee carry out the approved closure plan as set found in Section _____ of the approved permit application? [Condition B.27] Yes No N/A

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 No N/A

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 No N/A

f. Has the permittee certified that the facility has been closed in accordance with the specifications in the approved closure plan as required by OAC rule 3745-55-15? [Condition B.33] Yes No N/A

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] Yes No N/A

POST-CLOSURE MAINTENANCE

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

78. Has the permittee inspected the components, structures, and equipment at the site in accordance with the inspection schedule in §____ of the permit application on a quarterly basis? [OAC rule 3745-55-17(A)(1)(b)] [Condition B.35] Yes No N/A

79. Has the permittee conducted and recorded an inspection of at least the following? [Condition B.35] Yes No N/A

a. Security control devices (gates, locks, fences and signs);

b. Erosion control;

c. Cover settlement, subsidence and displacement;

d. Vegetative cover conditions;

| | | |
|-----|---|--|
| 84. | 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"/> |
| 85. | 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"/> |
| 86. | 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"/> |
| 87. | 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 three years as required by OAC rule 3745-270-07(A)? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 88. | 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

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

CORRECTIVE ACTION

| | | |
|-----|--|--|
| 89. | 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 ____] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 90. | 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 checked="" type="checkbox"/> |
| | a. Did the permittee follow the steps indicated in Conditions E.10(a) and (b) and E.11? | 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.

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: AMG Vanadium

Facility Type: TSD/LQG EPA ID#: OHD042319244

Description of Waste

On-Site Management

Off-Site Management

| Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc) | | Waste Generated (e.g. sludge, spent solvent, ash, etc) | EPA Waste Code | QTY Generated per Month | Type of Accumulation/Storage (e.g. container, tank, etc) | Type of On-Site Treatment (recycle, wwt, etc) | Waste Location (Include map if possible) | Name, state, and type of activity occurring at the facility. | P2 Activities |
|--|------------------------------------|--|---|---|---|---|---|--|---|
| 1 | Baghouse from electric arc furnace | Baghouse Dust #1 (BHD #1) (process residual per variance) | No batches in 2011 thus far hazardous for chromium (D007) | 40 tons | accum. in 30 CY Rolloff box in baghouse #1 | NA | Full rolloff is placed outside RMSB for less than 90 days until sent offsite. | EQ, Canton, OH. Haz and non haz are stabilized and landfilled | Continuously pursuing customers for this material |
| 2 | Baghouse from electric arc furnace | Baghouse Dust #2 (BHD #2) (process residual per variance) | 100% is reused onsite.. | 100 tons | accum. in 30 CY rolloff box in baghouse #2. | 100% reused onsite by mixing into blend and reprocessing. | Stored in RMSB in rolloff or piles until re-use. | 3% not reprocessed manifested to Envirite, Canton, OH as haz waste. Stabilized and landfilled. | Recycled on-site. AMG plans to pelletize for more efficient reuse onsite. |
| 3 | FGD from Roaster | LimeAdd (process residual) | Non haz per variance | 25-30 tons per day when roaster in operation but varies | 100 CY steel tank (LimeAdd Silo). | | Next to Roaster | 50% sold to EQ as non haz; remainder to McCutcheon Enterprises, Apollo, PA for solidification and landfill stabilization | Limeadd which goes to EQ is being sold for landfill stabilizer. |

| | | | | | | | | | |
|---|--|---|--|---|---|--|--|---|---|
| 4 | Fly Ash and LimeAdd | Drop-out waste from ECT, multi-clone and reactor (process residual) | non haz per variance | 3 tons per month | four steel 1 CY hoppers | reused onsite by reblending in RMSB | Steel hoppers located under FGD system on roaster. | | Reblended onsite and sent back into furnace as raw material. |
| 5 | FGD System on Roaster | Wastewater from stack condensate and from rainfall in containment area below stack (process resid. per var) | non haz per variance and also bec. reused onsite for dust control. | 300 gal per month depending on rainfall | Collected in bucket and transferred into 2 plastic 250-gallon totes under FGD stack | re-used for dust control in RMSB | Under FGD stack | | Re-used for dust control in RMSB |
| | | | | | | | | | |
| 6 | Roaster | Refractory Brick (process residual per variance) | recycled | 1 rolloff or less per year | Rolloff box | Crushed in RMSB and used as raw material in mfg. process | Outside or inside RMSB | | Crushed and reused as raw material |
| 7 | Intermittent Production of Sodium Metavanadate in Chemical Plant | wastewater (not subject to variance) | non haz | | 5000 gallon indoor tank | Re-used for dust control in RMSB | Chemical Plant | | Re-used for dust control in RMSB. |
| 8 | Maintenance | Spent parts washer solvent | NA | 40 gallons per quarter | within parts washer in Maintenance area of Mill Bldg. | | Mill Bldg | Safety Kleen Wheeling, WV Continued Use program | Sent offsite for recycling. Company would consider another aqueous parts washer |

| | | | | | | | | | |
|----|---|---|-------------|---|--|---|---|--|--|
| 9 | Equipment Washdown in Washbay | Oil/water/dirt mixture (process residual per variance) | NA | 200 gallons per month but varies | 250 gallon totes | Re-used onsite for dust control in RMSB | East side of Mill Bldg | | Re-used onsite for dust control in RMSB. |
| 10 | Change-out of lubricating oils and hydraulic fluids from furnace, heavy equipment and forklifts | Used oil | UO | 50 gal per month of UO plus 300 gallons per year of hyd. fluids | 300-gallon tank and 55-gallon drums. | | Near maintenance area of Mill Bldg | Safety Kleen, Wheeling, WV recycled. | sent offsite for recycling |
| 11 | General Maintenance | Floor sweepings, Absorbant and air filters from equip. | Non haz | 4 CF box per month | Placed in rolloff box with BHD #1 | | | EQ, Canton, Ohio, landfilled | |
| 12 | General Operations in Railcar area, Roaster and LimeAdd Silo | PPE, baghouse bags (process residuals per variance) | non haz | varies | plastic overpack drums or in BHD #1 rolloff box. | | generated at railcar, roaster and LimeAdd silo, then transferred to rolloff scontaining BHD#1 | EQ Canton, OH stabilized and landfilled | |
| 13 | Furnace Room operations | Flame resistant uniforms worn in Mill Bldg and furnace room | Laundered | varies | accumulated in garbage bag | | Locker in gatehouse | Spirit Uniform Columbus, OH Laundered | Industrial laundering |
| 14 | Lighting | Spent lamps | Univ. Waste | varies | cardboard boxes in maint. store room. | | Maint. area of Mill Bldg | Veolia Environmental, Zanesville, recycled | sent offsite for recycling. |
| 15 | General Plant operations | 6 and 12 volt batteries from fork lifts | recycled | varies | accum. outside near Maint area | | Back Dock of maint area of Mill Bldg. | NAPA Auto Parts, Cambridge, OH recycled | sent offsite for recycling. |

| | | | | | | | | | |
|----|--------------------------|--|-------------|--------|-------------------------------|--|--------------------------|---|-----------------------------|
| 17 | General Plant Operations | spent batteries and mercury containing devices | Univ. waste | varies | buckets in maint. store room. | | Maint. area of Mill Bldg | Veolia Environmental, Zanesville recycled | sent offsite for recycling. |
|----|--------------------------|--|-------------|--------|-------------------------------|--|--------------------------|---|-----------------------------|

| | | | | | | | | | |
|----|--------------------|--------------------------------|----------|--------------------------------------|---|--|--------------|---------------------------------------|----------|
| 18 | Lab Analysis | lab chemicals | varies | Varies, 118 lb in 2010, none in 2011 | □A□A□□r□□□ □□□'□□□□□□ □□□□□□□□□□ □□□□□□□□□□ □□□ | | Lab | Chemtron, Avon, OH | |
| 19 | Furnace operations | Spent graphite from electrodes | recycled | 3 rolloffs per year | Rolloff boxes | | Outside RMSB | Recycled to Graphite Sales, Cleveland | Recycled |

REMARKS GENERAL INFORMATION

General Process Information:

AMG manufactures ferro vanadium alloy, which contains vanadium. Several by-products, ReVan® and ferro-nickelmoly pigs and skulls, are also produced in the process and sold. AMG uses secondary materials and residuals, which contain vanadium pentoxide from other industries, as raw materials. One of the main secondary materials used by AMG is spent petroleum catalyst (K171/K172), which is sent to AMG as a hazardous waste from Shell Alberta in Canada. Per a 2008 variance, the spent catalyst is exempt as a hazardous waste once it reaches AMG. The spent catalyst is roasted by AMG in a roaster prior to being mixed with other secondary materials and placed in an electric arc furnace to reclaim vanadium. The furnaces are considered exempt by USEPA and Ohio EPA from federal BIF rules because of metal (vanadium) recovery). Reductant (shredded aluminum cans), silica and carbon are added to the mixture. Heat drives out heavy metals (Ni, Moly, Fe, Cr), which are formed into pigs and sold as an alloy. Enriched slag containing V_2O_5 is placed into a second electric arc furnace. Additional reductant is added as well as aluminum dross and lime. Ferro vanadium is formed. A "Revan" slag formed in the process is removed, placed in a pile on the ground and sold to the mineral industry for further use."

Baghouse dust from 2 baghouses (one for each furnace) is generated. Approx. 70% of baghouse dust which is generated onsite is recycled back into manufacturing process, as vanadium contained in it is still high enough for further recovery. Baghouse dust which is recycled onsite is stored in a containment building (RMSB) in rolloffs or bulk piles. Wastewaters generated onsite from a variety of processes is reused in the RMSB for dust control.

The remaining 30% of baghouse dust is evaluated per each rolloff box and disposed of after accumulating for less than ninety days in rolloff boxes near the RMSB. This baghouse dust is only episodically characteristic for D007. In the past, it also has included D006 and D010. Per the variance, the baghouse dust is not a listed hazardous waste, but must be characterized for toxicity prior to disposal.

LimeAdd, generated from the desulfurization of roaster emissions, is also generated in large quantities. Per the variance, this is not a listed waste but must be characterized. Limeadd is consistently characterized as nonhazardous. 50% of Limeadd is currently being sold as landfill cover. The rest is sent offsite, solidified and used for landfill stabilization.

Nearly all of the above wastes were considered K171/K172 hazardous wastes prior to a variance being granted to MVC by Ohio EPA in 2006. A second variance was granted in 2008 (see below for more information). With a variance in place, MVC must comply with conditions of the variance when managing their waste.

AMG also periodically operates a small chemical plant where small batches of vanadium bearing chemicals are manufactured when the business climate is favorable. Operations at the chemical plant are not covered under the variance. Non hazardous wastewater generated from this process when the plant is in operation is used for dust control in the RMSB.

A new RMSB was constructed in 2010, thus two RMSBs are currently in operation at AMG. AMG believes that it is in their "strategic business interest to submit a Class 3 Modification" for this building in order to include it on the Part B permit for storage, and is having a consulting firm prepare the permit modification and complete the application process. A new roaster is currently under construction and will be online in late 2012.

Regulatory/Enforcement History (if applicable):

Note: Metallurg Vanadium Corporation (MVC) changed their name to AMG Vanadium in January 2010.

A multi-divisional Permanent Injunctive Consent Order (PICO) was issued on April 11, 1997. The company settled with USEPA for violations of hazardous waste rules and with Ohio EPA for separate hazardous waste violations and violations of the PICO.

A Part A permit was submitted to Ohio EPA on December 6, 2002, and approved on June 10, 2002. With the promulgation of new rules regarding BIFs by Ohio on December 7, 2004, the Roaster operated by MVC would have been regulated as a BIF if hazardous waste were processed in it, however, the waste is not hazardous per the a 2006 and later a 2008 variance. MVC submitted subsequent Part A;s that were later approved by Ohio EPA.

On September 26, 2006 Ohio EPA granted MVC a variance from classification as a waste, allowing MVC to store vanadium bearing petroleum catalyst received from Shell Alberta before recycling. Prior to the variance, many of MVC's activities, raw materials and process residuals were regulated as hazardous waste management. Since the variance was issued, many of MVC's wastes are now considered "process residuals", and many of MVC's activities are no longer regulated as hazardous waste management, rendering MVC an episodic large quantity generator of hazardous waste. A second variance was granted on November 18, 2008 which allows MVC to receive spent catalyst (K171/K172) from anywhere in the world. The 2008 variance supersedes the 2006 variance. MVC must comply with the terms of the 2008 variance in addition to the terms of the 2008 Part B permit.

A Part B Permit for MVC was journalized on May 2, 2008 for the storage of spent petroleum catalyst (K171/K172) in the containment building (RMSB). MVC filed this Part B permit as a "protective measure" so as not to disrupt business operations should they need to accept hazardous waste which is not covered in the variance. The Part B permit was issued six months prior to the signing of the November 18, 2008 variance which provides an exemption for all spent catalyst that they would accept from anywhere. While the Part B permit for storage of spent catalyst K171/K172 in a containment bldg is currently in effect, as a result of the variance MVC is not storing any spent catalyst that can be considered hazardous. However, MVC must still comply with the terms of the permit.

Other: NA

| | | |
|--|---|-----------------------|
| Send to Central Office <input type="checkbox"/> | Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM | For Ohio EPA use only |
|--|---|-----------------------|

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: OHD042319244 | |
| Site Name | Name: AMG Vanadium | Website: (Optional) |
| Site Location Information | Street Address: 60790 Southgate Road | |
| | City, Town, or Village: Cambridge | State: OH |
| Site Land Type (check only one) NAICS code(s) www.census.gov/epcd/www/naics.html | County Name: Guernsey | Zip Code: |
| | Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/> | |
| | 331112 | |

| | | | |
|---|---|-------------------------|----------------------------|
| Facility Representative | First Name: Richard | MI: | Last Name: Caldwell |
| Additional names can be recorded in number 12 | Title: Health and Safety Manager | | |
| Only provide address information if it is different than the site address | Phone Number: 740-432-6345 | Phone Number Extension: | |
| | E-Mail Address: | | |
| | Fax Number: | 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: AMG Vanadium | | Date Became Owner (mm/dd/yyyy): | |
| | Owner Type: Private <input checked="" type="checkbox"/> | County <input type="checkbox"/> | District <input type="checkbox"/> | Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/> |
| | Street or P.O. Box: | | | |
| | City, Town or Village: | | Owner Phone #: | |
| | State: | | Country: | Zip Code: |
| | Name of Site's Operator: AMG Vanadium | | Date Became Operator (mm/dd/yyyy): | |
| | Operator Type: Private <input checked="" type="checkbox"/> | County <input type="checkbox"/> | District <input type="checkbox"/> | Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/> |
| | Street or P.O. Box: | | | |
| | City, Town or Village: | | Operator Phone #: | |
| | State: | | Country: | Zip Code: |

| | |
|--------------------------|---|
| VIOLATIONS CITED? | <input type="checkbox"/> Yes <input checked="" 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 type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). <i>Check the box for the applicable generator status and provide a comment.</i> | <input checked="" type="checkbox"/> Large Quantity Generator (LQG) EPISODIC <input type="checkbox"/> Small Quantity Generator (SQG) <input type="checkbox"/> Conditionally Exempt Small Quantity Generator <input 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 type="checkbox"/> Hazardous Waste Transporter | <input checked="" 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 checked="" type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input 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

- Batteries
 Pesticides
 Mercury containing equipment
 Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))

- Used Oil Generator
 Used Oil Transporter
 Used Oil Transfer Facility
 Used Oil Processor
 Used Oil Re-refiner
 Off-Specification Used Oil Burner
 Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil
 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.

- College or University
 Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
 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, U112). 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 RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

D007

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

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

Name of Inspector(s)

Donna Goodman

Name of Inspector(s)

Date of Inspection/Time

(mm/dd/yyyy) (hh:mm)

12/5/11 9:30 AM

Comments:

CONTAINMENT BUILDING CHECKLIST

CESQG: < 100 Kg. (approximately 25-30 gallons) of waste in a calendar month.

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

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

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

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

DESIGN AND OPERATING STANDARDS

| | | |
|---|--|--|
| 1. | Are the containment buildings completely enclosed with a floor, walls, and a roof to prevent exposure to the elements (e.g., precipitation, wind, run-on), and to ensure containment of managed wastes? [3745-205-101(A)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 2. | Are the floor and containment walls of the unit, including the secondary containment system (if required), designed and constructed of materials of sufficient strength and thickness to: [3745-205-101(A)(2)] | |
| a. | Support themselves, the waste contents, and any personnel and heavy equipment that operate within the unit? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Prevent failure due to pressure gradients, settlement, compression, or uplift? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Prevent failure due to physical contact with the wastes to which they are exposed? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d. | Prevent failure due to climatic conditions? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| e. | Prevent failure due to stresses of daily operation, including the movement of heavy equipment within the unit and contact of such equipment with containment walls? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 3. | Is the unit designed so that it has sufficient structural strength to prevent collapse or other failure? [3745-205-101(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| <p>NOTE: <i>DHWM will consider standards established by professional organizations generally recognized by the industry such as the American Concrete Institute (ACI) and the American Society of Testing Materials (ASTM) in judging the structural integrity requirements of containment buildings. An exemption to the structural strength may be made for lightweight doors and windows if appropriate to the nature of waste management operation to take place in the unit. The lightweight doors and windows must meet the criteria in OAC rule 3745-205-101(A)(2)(a)&(b).</i></p> | | |
| 4. | Are incompatible hazardous wastes or treatment reagents placed in the unit or its secondary containment system that could cause the unit or secondary containment system to leak, corrode, or otherwise fail? [3745-205-101(A)(3)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 5. | Does the containment building have a primary barrier that is: [3745-205-101(A)(4)] | |
| a. | Designed to withstand the movement of personnel, waste, and handling equipment in the unit during the operating life of the unit? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Appropriate for the physical and chemical characteristics of the waste to be managed? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 6. | Is the containment building used to manage hazardous waste containing free liquids or treated with free liquids? If so, has the owner/operator included: [3745-205-101(B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | A primary barrier designed and constructed of materials to prevent the migration of hazardous constituents into the barrier (i.e., geomembrane covered by a concrete wear surface)? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | A liquid collection and removal system to minimize the accumulation of liquid on the primary barrier of the containment building? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| i. | Is the primary barrier sloped to drain liquids to the associated collection system? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| ii. | Are liquids and waste collected and removed to minimize hydraulic head on the containment system at the earliest practicable time? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

[Facility Name/Inspection Date]

[ID number]

RCRA Hazardous Waste Containment Building Checklist/April 2009

Page 1 of 4

| | | | |
|---|-----|--|--|
| | c. | A secondary containment system including a secondary barrier designed and constructed to prevent migration of hazardous constituents into the barrier, and a leak detection system that is capable of detecting failure of the primary barrier and collecting accumulated hazardous wastes and liquids at the earliest practicable time? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | i. | Is the leak detection component constructed with a bottom slope of 1% or more? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | ii. | Is the leak detection component constructed of a granular drainage material with a hydraulic conductivity of 1×10^{-2} cm/sec or more and a thickness of twelve inches (30.5 cm) or more, or constructed of synthetic or geonet drainage materials with transmissivity of 3×10^{-5} m ² /sec or more? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | d. | If treatment is to be conducted in the buildings, is an area in which such treatment will be conducted designed to prevent the release of liquids, wet materials, or liquid aerosols to other portions of the building? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | e. | Is the secondary containment system constructed of materials that are chemically resistant to the waste and liquids managed in the containment building and of sufficient strength and thickness to prevent collapse under the pressure exerted by overlaying materials and by any equipment used in the containment building? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| <p><i>NOTE: Under certain conditions, containment buildings may serve as secondary containment systems for tanks placed within the building. A containment building may serve as an external liner system for a tank, provided it meets the requirements of OAC rule 3745-55-93(E)(1). In addition, the containment building shall meet the requirements of OAC rule 3745-55-93(B), (C)(1) and (C)(2) to be considered an acceptable secondary containment system for a tank.</i></p> | | | |
| 7. | | Are there existing units other than 90-day generator units? If so: [3745-205-101(B)(4)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| | a. | Did the owner/operator provide written notice to the director of their request? If so: | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | i. | Did the notification describe the unit and its operating practices with specific reference to the performance of existing containment systems, and specific plans for retrofitting the unit with secondary containment? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | b. | Did the owner/operator respond within 30 days to any comments from the director on these plans? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | c. | Did the owner/operator fulfill the terms of the revised plan approved by the director? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| <p><i>NOTE: An existing containment building is one constructed prior to December 7, 2000.</i></p> | | | |
| 8. | | Does the owner/operator of all containment buildings use controls and practices to ensure containment of hazardous waste within the unit? And at a minimum do the following: [3745-205-101(C)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | a. | Maintain the primary barrier to be free of significant cracks, gaps, corrosion, or other deterioration that could cause hazardous waste to be released from the primary barrier? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. | Maintain the level of stored/treated hazardous waste within the containment walls of unit so that the height of any containment is not exceeded? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | c. | Take measures to prevent the tracking of hazardous waste out of the unit by personnel or by equipment used in handling the waste? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | d. | Designate an area to decontaminate equipment, and collect and properly manage any rinseate? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | e. | Take measures to control fugitive dust emissions such that any openings (doors, windows, vents, cracks, etc.) exhibit no visible emissions? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| <p><i>NOTE: Use Method 22 in Appendix A of 40 CFR 60 to determine visible emissions. Visible emissions training is provided by smoke schools.</i></p> | | | |

[Facility Name/Inspection Date]

[ID number]

RCRA Hazardous Waste Containment Building Checklist/April 2009

Page 2 of 4

| | | | |
|-----|--|---|--|
| 9. | Has the owner/operator obtained certification by a qualified registered professional engineer that the containment building design meets the requirements of OAC rule 3745-205-101(A) to (C)(4)? [3745-205-101(C)(2)] | | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | a. | For units placed into operation prior to the effective date of OAC rule 3745-205-101 (December 7, 2000), did the owner/operator place the certification in the facility's operating record? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. | For units placed into operation after the effective date of OAC rule 3745-205-101, did the owner/operator obtain certification prior to operation of the unit? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 10. | Did the owner/operator promptly repair any condition that could lead to or cause a release of hazardous waste in accordance with the following procedures: [3745-205-101(C)(3)] | | |
| | a. | Upon detection of a condition that has led to a release of hazardous waste (e.g., upon detection of leakage from the primary barrier) did the owner/operator: | |
| | i. | Enter a record of the discovery in the facility's operating record? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | ii. | Immediately remove from service the containment building affected by the condition? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | iii. | Determine that steps shall be taken to repair the containment building, remove any leakage from the secondary collection system, and establish a schedule for accomplishing the cleanup and repairs? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | iv. | Within seven days after the discovery of the condition, notify the director of the condition, and within 14 working days, provide a written plan to the director with a description of the steps taken to repair the containment building and with the schedule for accomplishing the work? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 11. | Upon completing all repairs and cleanup, did the owner/operator notify the director in writing and provide verification, signed by a qualified registered professional engineer, that the repairs and cleanup have been completed according to the written plan submitted in accordance with OAC rule 3745-205-101(C)(3)(a)(iv) [3745-2050101(C)(3)(c)]? | | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 12. | Did the owner/operator, at least once every seven days, in order to detect signs of releases of hazardous waste, inspect and record in the facility's operating record, data gathered from: [3745-205-101(C)(4)] | | |
| | a. | Monitoring equipment? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. | Leak detection equipment? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | c. | The containment building? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | d. | The area immediately surrounding the containment building? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 13. | For containment buildings that contain both areas with secondary containment and without secondary containment, did the owner/operator: [3745-205-101(D)] | | |
| | a. | Design and operate each area in accordance with the requirements of OAC rule 3745-205-101(A) to (C)(4)? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. | Take measures to prevent the releases of liquids or wet materials into areas without secondary containment? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | c. | Maintain in the facility's operating record a written description of the operating procedures used to maintain the integrity of area without secondary containment? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

[Facility Name/Inspection Date]
[ID number]

| | | |
|---|---|--|
| 14. | If a permitted containment building does not have a secondary containment system, has the director waived requirements for secondary containment for the unit where the owner/operator demonstrated that the only free liquids in the unit are limited amounts of dust suppression liquids required to meet occupational health and safety requirements, and where containment of managed wastes and liquids can be assured without a secondary containment system? [3745-205-101(E)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| CLOSURE AND POST-CLOSURE | | |
| 15. | Did the owner/operator close the containment building? If so: [3745-205-102(A)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Did the owner/operator remove or decontaminate all waste residues, contaminated containment system components (liners, etc.), contaminated subsoils, and structures and equipment contaminated with waste or leachate? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Manage all waste generated by removal or containment as hazardous waste unless paragraph (D) of OAC rule 3745-51-03 applies? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 16. | Does the closure plan, closure activities, cost estimate for closure, and financial responsibility for containment buildings meet all of the requirements specified in OAC rules 3745-55-10 to 3745-55-20 and 3745-55-40 to 3745-55-51? [3745-205-102(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 17. | Did the owner/operator find that not all contaminated subsoils can be practically removed or decontaminated after making all reasonable efforts required by OAC 3745-205-102(A)? If so: [3745-205-102(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| a. | Did the owner/operator close the facility and perform post-closure care in accordance with the closure and post-closure requirements that apply to landfills (see OAC rule 3745-57-10)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| NOTE: A hazardous waste generator is exempt from all interim standards for closure and post closure and financial requirements, except for the closure performance standards of OAC rule 3745-66-11 and the disposal or decontamination of equipment structures and soil requirements of OAC rule 3745-66-14. | | |
| RECORD KEEPING | | |
| 18. | Is the containment building operated by a generator without a hazardous waste operating permit? If so: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Are written procedures to ensure that all wastes are removed from the unit and associated collection system at least once every 90 days maintained at the facility? [3745-52-34(A)(1)(d)(i)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Is documentation of the unit being emptied at least once every 90 days maintained at the facility? [3745-52-34(A)(1)(d)(ii)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

[Facility Name/Inspection Date]

[ID number]

RCRA Hazardous Waste Containment Building Checklist/April 2009

Page 4 of 4

**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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| <p><i>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).</i></p> | | |
| 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 type="checkbox"/> No <input checked="" 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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| <p><i>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.</i></p> | | |
| 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"/> |
| <p><i>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.</i></p> <p><i>NOTE: Written documentation of this determination is not required.</i></p> | | |
| 7. | Did the generator treat his HW /soil on-site to <u>meet</u> the LDR treatment standard? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| <p><i>NOTE If a Yes@ see question #16.</i></p> | | |
| 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"/> |
| 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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 10. | Does the generator have a copy of the LDR notification form on file?[3745-270-07(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| a. | Is the form 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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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 a 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 checked="" 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 <u>one</u> of the following conditions apply. [3745-270-03(c)] | |
|-----|----|---|--|

| | | | |
|--|----|--------------------|--|
| | i. | Contains > 1% TOC? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|--|----|--------------------|--|

| | | | |
|--|-----|---|--|
| | ii. | Contains organic constituents or cyanide at levels greater than the UST levels? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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 checked="" type="checkbox"/> |
|--|------|--|--|

| | | | |
|--|-----|--|--|
| | iv. | Has a reasonable heating value (e.g., > 5000 Btu)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|--|-----|--|--|

| | | | |
|--|----|--|--|
| | v. | Co-generated with a HW that must be combusted? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
|--|----|--|--|

| | | | |
|--|----|---|--|
| | b. | If all responses to 14 a.i. through 14 a.v. are a 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 checked="" 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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|--|----|---|--|

NOTE: If Yes, HW is improperly being treated by dilution.

| | | | |
|--|----|--|--|
| | b. | Does the waste carry the D001 code and contain ≥10% TOC? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input 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 a Yes and a 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 [3745-270-40(A)]? | | 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 type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| If a Yes@...complete the rest of the checklist. If a 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 checked="" 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 checked="" type="checkbox"/> |
| <i>NOTE: This is a laboratory analysis but it does not have to be kept by the generator.</i> | | | |
| 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 checked="" 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 checked="" 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 checked="" 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 checked="" type="checkbox"/> |
| NOTIFICATION FORM | | | |
| 17. | a. | Contains all information in #11 a-g above and | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | b. | If the treated HW/soil is listed.....notification contains the following certification statement: A I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or trough knowledge of the waste, to support this certification that the waste complies with the treatment stands 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 checked="" type="checkbox"/> |
| | c. | If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator: | |
| | i. | Send a one-time notification to the director?[3745-270- 09 (D)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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 checked="" type="checkbox"/> |
| | iii. | Include in the notification: [3745-270-09(D)(1)(a)] | |
| | 1. | Name & address of receiving landfill? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | 2. | Description of HW when generated? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | 3. | HW code when generated? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | 4. | Treatability group when generated? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | 5. | Underlying hazardous constituents present when generated? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | iv. | Contain the right certification statement as required by 3745-70-07(b)(4)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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

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

Safety Equipment Used:

GENERAL REQUIREMENTS

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

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

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

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

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

NOTE: Complete appropriate checklist for each unit.

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

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

| | | | |
|---|----|---|--|
| | e. | Are export related documents being maintained on-site? [3745-52-57(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| MANIFEST REQUIREMENTS | | | |
| 12. | | Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 13. | | Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| <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)]</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 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 type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 18. | | If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 19. | | 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 | | | |
| 20. | | Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 21. | | Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 22. | | 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"/> |
| 23. | | Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 24. | | 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"/> |
| 25. | | Does the generator keep records and documentation of: | |
| | a. | Job titles? [3745-65-16D(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| | b. | Job descriptions? [3745-65-16D(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? [3745-65-16D(3)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| d. | Completed training or job experience required? [3745-65-16D(4)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 26. | Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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

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

CONTINGENCY PLAN

| | | |
|-----|--|--|
| 27. | Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 28. | Does the plan describe the following: | |
| a. | Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)] | Yes <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 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]

| | | |
|-----|---|--|
| 29. | Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 30. | Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 31. | 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

| | | |
|-----|--|--|
| 32. | 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(J)? | 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

| | | |
|-----|---|--|
| 33. | 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"/> |
| 34. | Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: | |
| a. | Internal communications or alarm system? [3745-65-32(A)] | Yes <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 type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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

| | | |
|-----|---|--|
| 35. | Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 36. | 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"/> |
| 37. | Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 38. | If there is only one employee on the premises, is there immediate access to a device (eg., 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"/> |
| 39. | 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"/> |
| 40. | 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"/> |
| 41. | 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

| | | |
|-----|---|--|
| 42. | Does the generator ensure that satellite accumulation area(s): | |
| a. | Are at or near a point of generation? [3745-52-34(C)(1)] | Yes <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 stored in them? [3745-52-34(C)(1)(a)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 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"/> |
| 43. | 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 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 checked="" type="checkbox"/> N/A <input 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 | | | |
| 44. | | 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"/> |
| 45. | | 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"/> |
| 46. | | 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. | | | |
| 47. | | Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. | 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"/> |
| 48. | | Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 49. | | Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 50. | | If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 51. | | If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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. | | | |
| 52. | | If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745- 66-11? [3745-52-34(A)(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34] | | | |
| PRE-TRANSPORT REQUIREMENTS | | | |
| 53. | | Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 54. | | Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 55. | | Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

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

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

PROHIBITIONS

| | | |
|----|---|--|
| 1. | Does the generator manage used oil in a surface impoundment or waste pile? If yes: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

NOTE: For example, used oil contaminated scrap metal stored in a pile.

| | | |
|----|---|--|
| 2. | Is used oil used as a dust suppressant? [3745-279-12(B)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 3. | Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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

GENERATOR STANDARDS

| | | |
|----|---|--|
| 4. | Does the generator mix hazardous waste with used oil? If so, | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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

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

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

| | | |
|----|--|--|
| 6. | Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 7. | Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 8. | Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?"@ [3745-279-22(C)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 9. | Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| a. | Stopped the release? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Contained the release? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| c. | Cleaned up and properly managed the used oil and other materials? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| d. | Repaired or replaced the containers or tanks prior to returning them to service, if necessary? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

ON-SITE BURNING IN SPACE HEATER

| | | |
|-----|--|--|
| 10. | Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: | |
| a. | Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

| | | |
|----|--|--|
| b. | Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| c. | Are the combustion gases from heater vented to the ambient air? | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

GENERATOR TRANSPORTATION

| | | |
|-----|--|--|
| 11. | Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 12. | If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24] | |
| a. | Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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

COLLECTION CENTERS AND AGGREGATION POINTS

| | | |
|-----|---|--|
| 13. | Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 14. | Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 15. | Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

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

| SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS | | |
|--|--|--|
| Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more | | |
| Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less | | |
| PROHIBITIONS | | |
| 1. | Did the SQUWH dispose of universal waste? [3745-273-11(A)] | Yes <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 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| WASTE MANAGEMENT & LABELING/MARKING | | |
| UNIVERSAL WASTE BATTERIES | | |
| 3. | Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] | Yes <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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 5. | Does the SQUWH conduct any of the following activities: | |
| | a. Sort batteries by type? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| | b. Mix battery types in one container? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| | c. Discharge batteries to remove the electric charge? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| | d. Regenerated used batteries? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| | e. Disassemble them into individual batteries or cells? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| | f. Remove batteries from consumer products? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| | g. Remove the electrolyte from the battery? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| | If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 6. | If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] | Yes <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 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 battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| UNIVERSAL WASTE LAMPS | | |
| 8. | Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] | Yes <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 | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

[Facility Name/Inspection Date]

[ID Number]

Small Quantity Universal Waste Handler Requirements Batteries & Lamps/June 2008

Page 1 of 3

| | | |
|-----|--|--|
| | releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] | |
| 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"/> |

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

ACCUMULATION TIME

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

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

| | | |
|-----|---|--|
| 12. | Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C) | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| b. | Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| c. | Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| d. | Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| e. | Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| f. | Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" 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, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

OFF-SITE SHIPMENTS

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

| | | |
|-----|--|--|
| 17. | Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
|-----|--|--|

[Facility Name/Inspection Date]

[ID Number]

| NOTE: SQUWHs are prohibited to send waste to any other facility. | | |
|---|---|--|
| 18. | If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 19. | Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 20. | If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do <u>one</u> of the following: | |
| | a. Receive the waste back? [3745-273-18(E)(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | b. Agree to where the shipment will be 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 <u>one</u> of the following: | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| | b. Sending 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 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"/> |
| 23. | If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| EXPORTS | | |
| 24. | 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 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 U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -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 U.S. EPA's "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"/> |

[Facility Name/Inspection Date]

[ID Number]

AMG Vanadium VARIANCE INSPECTION CHECKLIST
Cambridge, Ohio Facility

Company: AMG Vanadium EPA ID#: OHD042319244

Street: 60790 Southgate Road City: Cambridge

County: Guernsey State: Ohio Zip: 43725

Mailing Address: _____
(If different from above)

Telephone: 740-432-6345 Fax #: 740-432-5937

Owner/Operator: AMG Vanadium
(If different from above)

Street: _____

City: _____ State: Ohio Zip: _____

Inspection Date(s): December 5 and 6, 2011 Time(s): 9:30 AM

Inspection Announced? Yes NO If so, how much advance notice given? 2 weeks

| | <u>Name</u> | <u>Affiliation</u> | <u>Telephone</u> |
|-------------|----------------------|--------------------|---------------------|
| Inspectors: | <u>Donna Goodman</u> | <u>OEPA</u> | <u>740-380-5293</u> |

Inspectors: _____

Facility Representative: Richard Caldwell AMG 740-432-6345 ext. 4665

Facility Representative: Susan Harrier AMG 740-432-6345

Variance from Waste Classification Issue date: November 18, 2008
Variance Terminates: November 18, 2018

AMG Vanadium

Background

AMG Vanadium (AMG)

AMG Vanadium was known as Metallurg Vanadium Corporation until a name change occurred on January 1, 2011. AMG operates a vanadium reclamation facility in Cambridge, Ohio. They buy and reclaim hazardous and nonhazardous vanadium-bearing wastes. The hazardous waste that AMG processes is spent catalyst from the petroleum refining industry. The nonhazardous waste is primarily bottom ash from the burning of coal to generate electricity. The spent catalyst comes from petroleum refineries and the bottom ash comes from coal-burning power plants in Mexico or other sources.

AMG reclaims the spent catalyst using a roaster to convert metallic sulfides to metallic oxides and to remove the sulfur. The conversion is necessary in order to reclaim the vanadium. Two electric arc furnaces are used to further process the catalyst and recover the vanadium.

AMG 's main product is an alloy of iron and vanadium called FERROVAN. It is sold to the steelmaking industry where it is used to strengthen steel. Other products AMG produces are:

1. Iron, Nickel, Molybdenum (FeNiMo) slabs, used in the making of steel; and
2. REVAN, used as a fluxing agent in the steelmaking process.

The current variance was issued November 18, 2008. The Variance terminates 10 years after the effective date on November 18, 2018.

General Variance Compliance

1. Has the expiration date (November 18, 2018) of the variance passed? (V.2.p and XI) Yes ___ No N/A ___ RMK#
- a. If the expiration date has passed and a new variance has not been issued, has AMG submitted an application for renewal at least 180 days before the expiration date?(V.2.p.i) Yes___ No ___ N/A ___RMK#

Note: AMG may continue to operate in accordance with the variance until a new variance is issued or denied if through no fault of AMG , a new variance has not been issued pursuant to 3745-50-23 on or before the expiration date (V.2.p).

2. Does AMG still own or operate the Cambridge Facility? (XI.1.a) Yes No ___ N/A ___RMK#
3. Does AMG still receive Reclaimed Catalyst? (XI.1.b) Yes No ___ N/A ___RMK#

Note: If an answer to questions 1a, 2 or 3 is no, this variance is terminated. See V.2.q, V.2.r and V.2.s concerning notification to Ohio EPA and preparation of a Sampling and Remediation Plan (SRP).

Site Entry-Availability of Records

4. Has AMG provided access to Ohio EPA at reasonable times for the following? (VII): Yes No ___ N/A ___RMK#
- a. Monitoring implementation of the variance? Yes No ___ N/A ___RMK#
- b. Conducting sampling? Yes___ No ___ N/A RMK#
- c. Inspecting and copying records, operating logs, contracts, and other documents and information related to the implementation or use of this variance? Yes No ___ N/A ___RMK#
- d. Verifying any data and other information submitted to Ohio EPA? Yes No ___ N/A ___RMK#

Recordkeeping/Operating Requirements

5. Has AMG provided Ohio EPA upon request copies of all documents and information related to issuance, use and implementation of this variance? (VI) Yes No ___ N/A ___RMK#

Note: see variance (VI) for specifics and issues related to trade secret confidentiality.

6. Does AMG record and retain the following documentation for three consecutive years and until December 31, 2014? (V.2.n)
- Yes No N/A RMK#
- a. Amounts of LimeAdd™ sold for use as an ingredient or as a substitute for a commercial product? Yes No N/A RMK#
- b. Amount of Roasted Catalyst sold for further reclamation? Yes No N/A RMK#
- c. Amount of baghouse dust reclaimed either on-site or off-site? Yes No N/A RMK#
- d. Amount of Reclaimed Catalyst received from each supplier? Yes No N/A RMK#

Note: The record must include each customer's name and address, and a description of how the materials were recycled.

7. Does AMG report the information in question #7 annually? This report is due on March 1st of each year for three consecutive years. The first report is due March 1, 2009. A copy should go to CO and SEDO. (V.2.o and XIII) Yes No N/A RMK#

Manifest System

8. Does AMG sign manifests and comply with OAC rule 3745-65-71? (V.2.a.i) Yes No N/A RMK#
9. Does AMG comply with OAC rule 3745-65-76 when hazardous waste K171/K172 is received not accompanied by a hazardous waste manifest? (V.2.a.ii) Yes No N/A RMK#

Material Handling/Minimization of Loss

10. Is AMG constructing, operating and maintaining all of the equipment and storage units associated with the reclamation process in such a manner to minimize loss or release into the environment of Reclaimed Catalyst, Roasted Catalyst and Process Residuals? (V.2) Yes No N/A RMK#
11. Does AMG store the Reclaimed Catalyst and Roasted Catalyst that **does not contain** free liquids in piles, tanks, railcars and/or containers? (V.2.b): Yes No N/A RMK#
- a. Are containers, railcars and tanks non-leaking and compatible with catalyst? (V.2.b.i) Yes No N/A RMK#

- b. Are containers kept closed except when catalyst is being added or removed? (V.2.b.i) Yes No ___ N/A ___ RMK#
- c. Are railcars stored at the railcar unloading station? (V.2.b.i) Yes No ___ N/A ___ RMK#
- d. Are containers stored in a Raw Material Storage Building? (V.2.b.i) Yes No ___ N/A ___ RMK#
- e. Are piles only stored in a Raw Material Storage Building? (V.2.b.ii) Yes No ___ N/A ___ RMK#
- f. Is the floor of the Raw Material Storage Building(s) compatible with the catalyst? (V.2.b.ii) Yes No ___ N/A ___ RMK#
12. Does AMG store the reclaimed Catalyst and Roasted Catalyst that **contains free liquids** in tanks, containers, railcars or piles? (V.2.c):
- a. Are containers, railcars and tanks nonleaking and compatible with catalyst? (V.2.c.i) Yes No ___ N/A ___ RMK#
- b. Are containers kept closed except when catalyst is being added or removed? (V.2.c.i) Yes No ___ N/A ___ RMK#
- c. Are railcars stored at the railcar unloading station? (V.2.c.i) Yes No ___ N/A ___ RMK#
- d. Are containers stored in a Raw Material Storage Building? (V.2.c.i) Yes ___ No N/A ___ RMK# 1
- e. Are piles only stored in the Wet Storage Area of a Raw Material Storage Building? (V.2.c.ii) Yes ___ No ___ N/A RMK#
- f. Is the floor of the Wet Storage Area compatible with the catalyst and has a primary barrier to prevent migration of oily residue? (V.2.c.ii) Yes No ___ N/A ___ RMK#
13. Does AMG operate and inspect the Raw Material Storage Building(s) in accordance with the terms and conditions of any permit issued pursuant to submittal of a part B application? (V.2.d) Yes No ___ N/A ___ RMK#

Notes: In the event that AMG no longer possesses an effective hazardous waste storage permit, AMG shall operate and inspect the Raw Material Storage Buildings according to OAC rules 3745-256-100 to 3745-256-102 (V.2.d)

AMG VANADIUM VARIANCE CHECKLIST

12-2008

Page 5 of 9

14. Does AMG use engineering controls and implement procedures to control the release of Roasted Catalyst fugitive dust during the loading and transport of Roasted Catalyst? (V.2.f) Yes No ___ N/A ___ RMK#
15. Does AMG use engineering controls and implement procedures to control the release of LimeAdd™ fugitive dust outside the silo during the loading of transport vehicles? (V.2.g) Yes No ___ N/A ___ RMK#
16. Has AMG documented all Emergency Spills, fires, or explosions, including the cause and action taken to respond? (V.2.i.i) Yes ___ No ___ N/A RMK#
- a. Has this documentation been retained on-site until the corrective action of the facility pursuant to ORC Chapter 3734 has been completed? (V.2.i.i) Yes ___ No ___ N/A RMK#
17. Does AMG determine if Emergency Spill cleanup residuals destined for disposal meet the definition of a characteristic hazardous waste and/or are defined as a listed hazardous waste pursuant to OAC rule 3745-52-11? (V.2.i.ii) Yes ___ No ___ N/A RMK#
- a. Does AMG manage Emergency Spill cleanup residuals meeting the definition of hazardous waste according to ORC 3734 and the hazardous waste management rules? (V.2.i.ii) Yes ___ No ___ N/A RMK#
- Note: Inspector should then complete other checklists as appropriate.*
18. Has AMG immediately cleaned up Incidental Spills of Reclaimed Catalyst, Roasted Catalyst and Process Residuals? (V.2.j) Yes No ___ N/A ___ RMK#
19. Does AMG determine if Incidental Spill cleanup residuals destined for disposal meet the definition of a characteristic hazardous waste and/or are defined as a listed hazardous waste pursuant to OAC rule 3745-52-11? (V.2.j.ii) Yes No ___ N/A ___ RMK#
- a. Does AMG manage Incidental Spill cleanup residuals meeting the definition of hazardous waste according to ORC Chapter 3734 and the hazardous waste management rules? (V.2.j.ii) Yes ___ No ___ N/A RMK#

Note: Inspector should then complete other checklists as appropriate.

AMG VANADIUM VARIANCE CHECKLIST

12-2008

Page 6 of 9

20. Does AMG maintain the following at the facility and revise as necessary? (V.2.h) Yes No ___ N/A ___ RMK#
- a. Facility Contingency Plan (Attachment F in Application)? (V.2.h) Yes No ___ N/A ___ RMK#
- b. Employee Training Program and Schedule (Attachment E in Application)? (V.2.l) Yes No ___ N/A ___ RMK#
- c. Inspection forms and procedures as described in Section 2, Attachment D of Application? (V.2.k) Yes No ___ N/A ___ RMK#

21. Does AMG maintain in good working order the equipment used to handle, store, convey and contain Reclaimed Catalyst, Roasted Catalyst and Process Residuals? (V.2.m) Yes No ___ N/A ___ RMK#

Note: Equipment includes but is not limited to: tanks, containers (including transport vehicles), secondary containment systems, loading and unloading areas, sumps, piping and conveyance systems.

Emergency Preparedness/Inspections & Monitoring

22. Is the Emergency personnel listed in Attachment F in Application current? (V.2.h) Yes No ___ N/A ___ RMK#
23. Is the spill response equipment listed in Attachment F of Application available? (V.2.h) Yes No ___ N/A ___ RMK#
24. Have arrangements been made with local response agencies (Attachment F in Application)? (V.2.h) Yes No ___ N/A ___ RMK#
25. Are inspections at designated areas (below) completed as described in Section 2, Attachment D of Application? (V.2.k) Yes No ___ N/A ___ RMK#

a. Areas:

- i. Roaster: once each day when the Roaster is in operation. Yes No ___ N/A ___ RMK#
- ii. Container Storage Pad once each week when unit is in operation. Yes ___ No ___ N/A RMK# 2
- iii. Raw Material Storage Building Visible Emissions Inspection: once per day on days the Raw Materials Storage Building is operational. Yes No ___ N/A ___ RMK#

AMG VANADIUM VARIANCE CHECKLIST

12-2008

Page 7 of 9

iv. Mobile Equipment: once each day when Raw Material Storage Building is in operation.

Yes No ___ N/A ___ RMK#

v. Yard Foreman Inspection Form: this inspection addresses the Furnace Room Floor, Briquetter System, the Raw Material Storage Building, Baghouse Area, and Rolloff Box pad. Inspection performed a minimum of once per week when facility is in operation.

Yes No ___ N/A ___ RMK# 3

vi. Railcar Unloading Area Station: once each day when railcars are spotted at the Railcar Unloading Area.

Yes No ___ N/A ___ RMK#

b. Emergency and Safety Equipment:

i. Fire Extinguisher: once per week that RCRA facility is in operation.

Yes No ___ N/A ___ RMK#

ii. Safety Equipment: once per week that RCRA facility is in operation.

Yes No ___ N/A ___ RMK#

iii. Emergency Response Equipment: once each week that RCRA facility is in operation.

Yes No ___ N/A ___ RMK#

c. Security Inspection: a minimum of once per month when facility is in operation.

Yes No ___ N/A ___ RMK#

26. Are inspection forms retained on-site for 3 years? (V.2.k)

Yes No ___ N/A ___ RMK#

27. Is employee training completed within 30 days of hiring and every 12 months thereafter? (Section 2, Attachment E in Application) (V.2.l)

Yes No ___ N/A ___ RMK#

a. Does the training program address the following training components (As described in Section 2, Attachment E in Application) (V.2.i):

Yes ___ No ___ N/A ___ RMK#

i. Contingency Plan Training (Level I and II)?

Yes No ___ N/A ___ RMK#

ii. Regulated Waste Training?

Yes No ___ N/A ___ RMK#

iii. Process training?

Yes No ___ N/A ___ RMK#

iv. Supervisor training?

Yes No ___ N/A ___ RMK#

28. Is documentation of training signed by the employee and retained at the Facility for three years? (V.2.i)

Yes No ___ N/A ___ RMK#

AMG VANADIUM VARIANCE CHECKLIST

12-2008

Page 8 of 9

Notification of New Suppliers

29. Does AMG provide written notification to Ohio EPA when Reclaimed Catalyst is received from a new supplier? (V.2.x) Yes No N/A RMK#

Managing Rejected Reclaimed Catalyst as a Hazardous Waste

30. Does AMG return rejected Reclaimed Catalyst to the supplier as soon as possible? (V.2.y) Yes No N/A RMK#

31. Does AMG transport rejected Reclaimed Catalyst to a hazardous waste TSD facility as soon as possible? (V.2.y) Yes No N/A RMK#

32. Does AMG send rejected Reclaimed Catalyst for legitimate recycling as soon as possible? (V.2.y) Yes No N/A RMK#

33. Does AMG manage rejected Reclaimed Catalyst as hazardous waste K171 or K172? (V.2.y) Yes No N/A RMK#

Remarks

#1. A 150 gallon container of free liquids (oil) that had settled out from a railcar shipment of reclaimed catalyst (K171) was accumulated in the Mill Building for up to 30 days prior to recycling the oil back into the reclaimed catalyst in feed hoppers in the Feed Building. The oil should have been stored in the RMSB.

#2. The Container Storage Pad ("RCRA Pad") has been generator closed.

#3. The Briquetter System is no longer used and has been generator closed.

