**Environmental Protection Agency**

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

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December 30, 2011

RE: CHEMICAL SOLVENTS, INC.
TSDF/LARGE QUANTITY GENERATOR
OHD 980 897 656/#02-18-0669
CUYAHOGA COUNTY, NOV

Mr. Anthony Dattilo
Chemical Solvents, Inc.
3751 Jennings Road
Cleveland, OH 44109

Dear Mr. Dattilo:

Thank you for accompanying Nyall McKenna and me during Ohio EPA's inspection of Chemical Solvents, Inc. (CSI) Dennison Avenue facility in Cleveland, Ohio. The inspection was December 9, 2011. I inspected Chemical Solvents to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC).

The Denison Avenue TSD facility is a recycler of various solvents and solvent blends. New solvents and solvent blends are also sold by the company. The facility is also a large quantity generator of hazardous waste.

In addition to the inspection for compliance with Ohio's hazardous waste rules, the facility was inspected for compliance with Ohio's used oil rules and universal hazardous waste rules. We found the following violations of Ohio's hazardous waste laws.

1. **OAC Rule 3745-55-95, Tank System Inspections:**
CSI must inspect the following components of the hazardous waste tank system once each operating day: The hazardous waste tanks and associated systems to detect corrosion or releases of waste; data gathered from monitoring or leak detection equipment to ensure the tank is being operated as designed; and, construction materials and area immediately surrounding the externally accessible portion of the tank system, including secondary containment system, to detect erosion or signs of releases of hazardous waste.

   CSI has violated this rule as follows: The inspections are not being done on weekend days (currently just on weekdays) though waste is being stored within the tank systems. This is a violation of OAC 3745-55-95, which requires daily inspection of the tank systems when the facility is operating (whenever the tank systems are managing hazardous waste).

   CSI must indicate in its response to this letter how procedures have been changed at the facility to ensure the required inspections are being done each operating day. In addition, submit one week of the completed daily tank system inspection log showing the inspections are occurring seven days per week for all tank systems containing hazardous waste or treating hazardous waste.

2. **OAC 3745-52-34 (C)(1)(b), Satellite Accumulation Area Requirements:**
Hazardous waste satellite accumulation containers must be labeled with the words "Hazardous Waste" or other words identifying the contents. CSI has violated this rule as follows:

**Northeast District Office**
2110 East Aurora Road
Twinsburg, OH 44087-1924

330 | 963 1200
330 | 487 0769 (fax)
www.epa.ohio.gov

During the inspection a satellite accumulation drum located in the "Luwa" area was discovered to not be labeled though it was accumulating hazardous waste (spent aerosol cans, D001). This violation was corrected during the inspection by your application of a hazardous waste label in Ohio EPA's presence. CSI is hereby returned to compliance with this violation.

**General Comments**

CSI needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, CSI is requested to provide documentation to this office including the steps taken to abate the violations cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to tom.roth@epa.ohio.gov.

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734. of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to $10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, CSI is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

Enclosed you will find a copy of the checklists that I completed as a result of the inspection. Should you have any questions, please feel free to call me at (330) 963-1231. You can find copies of the rules and other information on the Division's web page at: http://www.epa.state.oh.us/dhwm/.

Sincerely,

Tom Roth
District Representative
Division of Materials and Waste Management

TR:ddw

Enclosure

ec: Jeff Mayhugh, DMWM, CO
Nyall McKenna, DMWM, NEDO
Natalie Oryshkewych, DMWM, NEDO
cc: Marlene Kinney, DMWM, NEDO

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

Facility: Chemical Solvents Denison
Address: 1010 Denison Avenue
Cleveland, Ohio 44109

Ohio Permit: 02-18-0669
USEPA ID: OHD 980897656

County: Cuyahoga

Facility Phone: 216-741-9310

Inspection Date: 12 / ____ / 11

Time: _____ - _____

Was advance notice of the inspection given? (yes) ____ (no) ✓
If so, how far in advance? _____

| | ***Name*** | ***Agency/Title*** | ***Phone*** |
|---|---|---|---|
| Inspectors: | Tom Roth | OEPA / Env. Spec. II | (330) 963-1231 |
| | Nyall McKenna | OEPA / Supervisor | (330) 963-1272 |
| Facility Representatives: | Anthony Datillo | Chemical Solvents Inc. | (216) 741-9310 |

Is facility operating as a generator? (yes) ✓ (no) _____

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

***PERMIT STATUS***

Permit Issued: February 2, 2005
Permit Effective Date: February 2, 2005
Permit Expiration Date: February 2, 2015

***AUTHORIZED ACTIVITIES***

| ***STORAGE*** | ***TREATMENT*** | ***DISPOSAL*** |
|---|---|---|
| X Container (82,500 G) | X Tank (88, 000 G) | |
| X Container (88.4 $yd^3$) | | |
| X Tank (156, 000 G) | | |

(The Permittee is authorized to accept only up to 28,000 tons of hazardous waste from off-site sources in any one calendar year)

## *GENERAL CONDITIONS OF PERMIT*

### *GENERAL PERMIT COMPLIANCE AND ACTIVITIES*

1. Has the expiration date of the permit passed? Yes__ No✓ N/A__ RMK#__

   (a) **If so,** is the Permittee continuing any activity regulated by the permit after the expiration date of the permit? Yes__ No__ N/A✓ RMK#__

   (b) Has the facility submitted an application for a permit renewal to the Director no later than (180) days prior to the expiration date of the permit? (or upon a later date if the Permittee can demonstrate good cause for late submittal) [Condition A.6.(a)] Yes__ No ☐ N/A✓ RMK#__

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

   (a) The Permittee has submitted a timely and complete application for a renewal permit under OAC Rule 3745-50-40, and;

   (b) Through no fault of the Permittee, a new permit has not been issued pursuant to OAC Rule 3745-50-40 on or before the expiration date of the permit. [Condition A.6.(b)]

2. Has the Permittee submitted the annual permit fee, payable to Treasurer of the State, to the Ohio EPA on or before the anniversary of the date of issuance during the term of the permit [Condition A.25.]? Yes✓ No ☐ N/A__ RMK#__

3. Is the Permittee conducting any hazardous waste management activities (not otherwise exempt by law) which are not authorized by the permit? [Condition A.1. and A.5.] Yes ☐ No✓ N/A__ RMK#__

4. Have any provisions of the permit been identified as invalid?[Condition A.4.] Yes__ No✓ N/A__ RMK#__

5. Did the facility orally report information concerning a release of any hazardous waste that caused an endangerment to public drinking water supplies, a fire or an explosion which threatened human health or the environment outside the facility to the Ohio EPA Division of Emergency and Remedial Response

within two hours of becoming aware of the circumstance(s): [Condition A.20.(a)] no HW releases since last inspection — Yes__ No ☐ N/A ✓ RMK#__

6. Did the report contain the following information?(if such information was available at the time of the oral report):

   i. Name, address and telephone number of the owner or operator? — Yes__ No ☐ N/A ✓ RMK#__
   ii. Name, address and telephone number of the facility? — Yes__ No ☐ N/A ✓ RMK#__
   iii. Name and quantity of material(s) involved?
   iv. The extent of injuries, if any? — Yes__ No ☐ N/A ✓ RMK#__
   v. An assessment of the actual or potential hazards to the environment and human health outside the facility, where applicable? — Yes__ No ☐ N/A ✓ RMK#__
   vi. Estimated quantity and disposition of recovered material that resulted from the incident? — Yes__ No ☐ N/A ✓ RMK#__

7. Did the Permittee provide a written report to the Ohio EPA's Division of Emergency and Remedial Response and DHWM NEDO within (5) days of the time the Permittee became aware of the circumstances reported in Question 5? [Condition A.21.] — Yes__ No ☐ N/A ✓ RMK#__
   **If so**, did the report contain the following?

   (a) A description of the noncompliance and its causes; — Yes__ No ☐ N/A ✓ RMK#__

   (b) The periods of non compliance (including exact dates and times); — Yes__ No ☐ N/A ✓ RMK#__

   (c) Whether the noncompliance has been corrected and if not, the anticipated it is expected to continue? and; — Yes__ No ☐ N/A ✓ RMK#__

   (d) Steps taken or planned to minimize the impact on human health and the environment and to reduce and prevent recurrence of the noncompliance? — Yes__ No ☐ N/A ✓ RMK#__

***NOTE:*** The Permittee need not comply with the (5) 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 becomes aware of the circumstances. [Condition A.21.(c)]

8. Has the Permittee expeditiously taken all steps necessary to

minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8.] Yes__ No ☐ N/A ✓ RMK#__

9. Has the Permittee identified any other instances of noncompliance not provided for in Question #5? Yes__ No__ N/A ✓ RMK#__

   (a) **If so**, did the Permittee report these instances to the Director within a month of becoming aware of the noncompliance? [Condition A.22.] Yes__ No ☐ N/A ✓ RMK#__

   (b) Do the reports provided contain the information set forth in Condition A.20? [Condition A.22.] Yes__ No ☐ N/A ✓ RMK#__

10. Did the Permittee make any planned changes in the permitted facility or operations which may result in noncompliance with the terms and conditions of the permit? [Condition A.17] Yes__ No__ N/A ✓ RMK#__

   (a) If so, did the facility provide Ohio EPA with notice of such changes? Yes__ No ☐ N/A ✓ RMK#__

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

## ***PERMIT MODIFICATION, REVISION, REVOCATION***

1. Has the Permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.] Yes ✓ No__ N/A__ RMK#__

2. Has the permit been transferred to a new owner or operator? [Condition A.18.] **If so,** Yes__ No ✓ N/A__ RMK#__

   (a) Was the transfer conducted in accordance with O.R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.18.(b)] and; Yes__ No ☐ N/A ✓ RMK#__

   (b) Before transferring ownership did the Permittee notify the new owner / operator in writing of the requirements of O.R.C. Chapter 3734 and the rules adopted thereunder (including all applicable corrective action requirements? [Condition A.18.(b)] Yes__ No ☐ N/A ✓ RMK#__

3. Has the Permittee submitted reports of compliance or non-

compliance with, or any progress reports on the requirements contained in any compliance schedule of the permit to the Ohio EPA no later than (14) days following each scheduled date, unless otherwise specified? [Condition A.19.] Yes__ No ☐ N/A ✓ RMK#__

4. Has the Permittee furnished relevant information which the Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, or to determine compliance with the permit? [Condition A.10.] Yes ✓ No ☐ N/A__ RMK#__

5. Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10] Yes ✓ No ☐ N/A__ RMK#__

6. Did the Permittee fail to submit any relevant facts or submit incorrect, misleading or incomplete information in permit? [Condition A.23] Yes__ No ✓ N/A__ RMK#__

   (a) **If so,** upon becoming aware that it failed to submit this information, did the Permittee promptly submit such facts or corrected information to the appropriate entity? Yes__ No ☐ N/A ✓ RMK#__

7. Is the Permittee maintaining records of all data used to complete the Part B permit application and any amendments, supplements, modifications or revisions to the application? [Condition A.14.(c)] Yes ✓ No ☐ N/A__ RMK#__

8. Is the Permittee retaining a complete copy of the approved application? [Condition A.14.(c)] Yes ✓ No ☐ N/A__ RMK#__

9. Is the Permittee planning any physical alterations or additions to the permitted facility? Yes__ No ✓ N/A__ RMK#__

   (a) **If so,** has the Permittee given notice to the Director of such alterations/additions? [Condition A.15] Yes__ No ☐ N/A ✓ RMK#__

   (b) Have such changes been made in accordance with O.A.C. Rule 3745-50-51? [Condition A.15.] Yes__ No ☐ N/A ✓ RMK#__

## ***SITE ENTRY - AVAILABILITY OF RECORDS***

1. Has the Permittee allowed the Director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection, to: [Condition A.11]

(a) Enter at reasonable times upon the premises where a regulated activity is located or conducted, or where records are kept under the conditions of the permit? Yes ✓ No ☐ N/A___ RMK#__

(b) Have access to and copy any records required to be kept under the conditions of the permit? Yes ✓ No ☐ N/A___ RMK#__

(c) Inspect and photograph, at reasonable times, any facilities, equipment (including control and monitoring equipment), practices or operations regulated under the conditions of the permit? Yes ✓ No ☐ N/A___ RMK#__

(d) Sample, document, or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by O.R.C. Chapter 3734 and the rules adopted thereunder? Yes ✓ No ☐ N/A___ RMK#__

## ***RECORDKEEPING REQUIREMENTS***

1. Has the Permittee requested confidentiality of any information of the permit in accordance with O.R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.24.] Yes ✓ No___ N/A___ RMK#__

2. Is the Permittee maintaining a written operating record at the facility as set forth in O.A.C. Rule 3745-54-73 and Condition B.21 of the permit which contains the following elements: Yes ✓ No ☐ N/A___ RMK#__

   (a) A description and the quantity of each hazardous waste received? Yes ✓ No ☐ N/A___ RMK#__

   (b) Method(s) and date(s) of treatment, storage or disposal at the facility? Yes ✓ No ☐ N/A___ RMK#__

   (c) The location of each hazardous waste within the facility and the quantity at each location? Yes ✓ No ☐ N/A___ RMK#__

3. Is the Permittee maintaining, until closure is complete and certified, the following documents (including amendments, revisions and modifications): [Condition A.27.(a)]

   (i) Waste analysis plan in accordance with O.A.C. Rule

3745-54-13 and the conditions of the permit? Yes ✓ No ☐ N/A___ RMK#__

(ii) Contingency plan in accordance with O.A.C. Rule 3745-54-53 and the conditions of the permit? Yes ✓ No ☐ N/A___ RMK#__

(iii) Closure plan in accordance with O.A.C. Rule 3745-55-12 and the conditions of the permit? Yes ✓ No ☐ N/A___ RMK#__

(iv) Cost estimate for facility closure in accordance with O.A.C. Rule 3745-55-42 and the conditions of the permit? (estimate only - adequacy of estimate will be evaluated by C.O. financial assurance personnel) Yes ✓ No ☐ N/A___ RMK#__

(v) Personnel training plan and records required by O.A.C. Rule 3745-54-16 and the conditions of the permit Yes ✓ No ☐ N/A___ RMK#__

(vi) Operating record required by O.A.C Rule 3745-54-73 and the conditions of the permit? Yes ✓ No ☐ N/A___ RMK#__

(vii) Inspection schedules developed in accordance with O.A.C. Rule 3745-54-15 and O.A.C. Rule 3745-55-74 3745-55-95 and the conditions of the permit? Yes ✓ No ☐ N/A___ RMK#__

(viii) Post-Closure Plan required by O.A.C. Rule 3745-55-18(A) and the permit? Yes ✓ No ☐ N/A___ RMK#__

(ix) Annually-adjusted cost estimate for facility closure as required by O.A.C. Rule 3745-55-42 and 3745-55-44 and the permit? Yes ✓ No ☐ N/A___ RMK#__

(x) All other documents required by Module A? Yes ✓ No ☐ N/A___ RMK#__

4. Have any of the documents identified in Question #3 been revised as required by the permit?

(a) **If so,** has the Permittee submitted the revisions to the Director? [Condition A.27.(b)] Yes___ No ☐ N/A ✓ RMK#__

(b) Has the Permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.27.(b)] Yes___ No ☐ N/A ✓ RMK#__

5. Is the Permittee maintaining copies of all inspection logs at the facility for a period of at least three years from date

of inspection? [Condition A.27.(c)] Yes ✓ No ☐ N/A___ RMK#__

6. Are Corrective Action reports and records as required by Conditions E.1 through E.11 of the permit being maintained for at least 3 years after all Corrective Action activities have been completed? [Condition A.27.(d)] Yes___ No ☐ N/A ✓ RMK#__

*ANNUAL REPORT REQUIREMENT*

7. Is the Permittee complying with annual report requirements set forth in O.A.C. Rule 3745-54-75 and the additional report requirements set forth in O.A.C. Rule 3745-54-77? [Condition B.24.] Yes ✓ No ☐ N/A___ RMK#__

*SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS*

8. In compliance with Condition A.12.(b) of the permit, do the Permittee's records of monitoring information specify the:

   (i) Date(s), exact place(s), time(s) and method(s) of sampling or measurement? Yes ✓ No ☐ N/A___ RMK#__

   (ii) Individual(s) who performed the sampling or measurement? Yes ✓ No ☐ N/A___ RMK#__

   (iii) Date(s) analyses were performed? Yes ✓ No ☐ N/A___ RMK#__

   (iv) Individual(s) who performed the analyses? Yes ✓ No ☐ N/A___ RMK#__

   (v) Analytical technique(s) or method(s) used? Yes ✓ No ☐ N/A___ RMK#__

   (vi) Results of such analyses? Yes ✓ No ☐ N/A___ RMK#__

9. Was the appropriate SW-846 method or an equivalent method specified in the approved waste analysis plan followed when obtaining a representative sample? [Condition A.12(a)] Yes ✓ No ☐ N/A___ RMK#__

10. Have all applications, reports or information been properly signed and certified in accordance with O.A.C. Rule 3745-50-58(K)? [Condition A.13.] Yes ✓ No ☐ N/A___ RMK#__

*WASTE MINIMIZATION REQUIREMENTS*

11. Has the Permittee submitted a Waste Minimization Report describing the waste minimization program required by O.A.C. Rules 3745-54-75(H),(I), and (J); 3745-54-73(B)(9); and 3745-52-20(B) at least once every two years and the provisions of O.A.C. Rules 3745-54-75(H),(I), and (J); and 3745-54-73(B)(9) annually? [Condition A.28.(a)] Yes ✓ No ☐ N/A__ RMK#__

## *OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS*

1. Is all hazardous waste transported from the facility by a properly registered transporter of hazardous waste in accordance with all applicable laws and rules? [Condition A.16.] Yes ✓ No ☐ N/A__ RMK#__

*MANIFEST REQUIREMENTS/WASTES RECEIVED ON-SITE*

2. Upon receipt of manifests, has the Permittee signed and dated each copy of the manifest? [OAC 3745-54-71(A)(1); Condition B.23.] Yes ✓ No ☐ N/A__ RMK#__

3. For any significant discrepancies identified on the manifest(s): did the Permittee note such discrepancies on the manifest(s) in accordance with OAC rule 3745-54-71 (A)(2) and Condition B.23.? Yes ✓ No ☐ N/A__ RMK#__

   (a) Did the Permittee attempt to reconcile the discrepancy? [Condition B.23.] Yes ✓ No ☐ N/A__ RMK#__

   (b) If the discrepancy was not resolved within (15) days: did the Permittee submit a report, including a copy of the manifest, to the Director in accordance with OAC rule 3745-54-72? [OAC rule 3745-54-72(B) Condition B.23.(b)] Yes__ No ☐ N/A ✓ RMK#__

4. Does the Permittee immediately give the transporter at least one copy of the signed manifest? [OAC rule 3745-54-71 (A)(3); Condition B.23.] Yes ✓ No ☐ N/A__ RMK#__

5. Does the Permittee provide the generator with a copy of the manifest within 30 days of receipt of waste on-site? [OAC rule 3745-54-71(A)(4); Condition B.23.] Yes ✓ No ☐ N/A__ RMK#__

6. Does the Permittee retain a copy of each manifest on-site for at least three years from the date of delivery?

[OAC rule 3745-54-71(A)(5); Condition B.23.] Yes ✓ No ☐ N/A__ RMK#__

7. Does the Permittee receive bulk shipment(s) of hazardous waste from rail or water?

   (a) **If so,** is the Permittee complying with the requirements of OAC rule 3745-54-71(B)? [Condition B.23.] Yes__ No ☐ N/A ✓ RMK#__

8. Has the Permittee received any hazardous waste from a foreign source since the date of last inspection? Yes__ No ✓ N/A__ RMK#__

   (a) **If so,** did the Permittee provide notification to the Director of receipt of such wastes in writing at least four weeks in advance of the date the Permittee expected to receive the waste? [Condition B.2.(a)] Yes__ No ☐ N/A ✓ RMK#__

9. *Where the Permittee received waste from an off-site source (except where the Permittee is also the generator):* Does the Permittee inform the generator in writing that the facility has the appropriate permits and will accept the waste the generator is shipping? [Condition B.2.(b)] Yes__ No ☐ N/A ✓ RMK#__

   (a) Is the Permittee maintaining a copy of this written notice in the operating record? [Condition B.2.(b)] Yes__ No ☐ N/A ✓ RMK#__

10. Does the Permittee ensure that no more than 28,000 tons of hazardous waste from off-site sources are accepted in any one calendar year? (Note: This is a facility-wide limitation and includes all units) [Condition B.1.(b)] Yes ✓ No ☐ N/A__ RMK#__

***NOTE:*** *For wastes shipped off-site by the Permittee:* the Permittee must comply with the generator manifest/shipment requirement of Chapter 3745-52 of the Ohio Administrative Code. Please complete the Generator Requirements section of the current inspection checklist to document compliance with these requirements.

## *WASTE ANALYSIS/WASTE ANALYSIS PLAN*

### *GENERAL REQUIREMENTS*

1. Does the Permittee follow the procedures described in the approved waste analysis plan found in Section C of the

approved permit and the terms and conditions of this permit? [Condition B.3.; O.A.C. Rule 3745-54-13] Yes✓ No ☐ N/A__ RMK#__

2. Since the last inspection, were any wastes generated by the facility which were unable to be characterized through process knowledge? Yes✓ No__ N/A__ RMK#__

   (a) **If so,** were the waste analysis procedures described in Section C of the approved permit application followed? Yes✓ No ☐ N/A__ RMK#__

3. Is the Permittee maintaining waste analysis data in the facility's operating record as required by OAC rule 3745-65-73 and Condition B.21. of the permit? Yes✓ No ☐ N/A__ RMK#__

***WASTE ANALYSIS QUALITY ASSURANCE REQUIREMENTS***

4. Is the Permittee verifying the analysis of each waste stream annually as part of its quality assurance program in accordance with SW-846? [Condition B.3.] Yes✓ No ☐ N/A__ RMK#__

5. In accordance with Condition B.3. of the permit, does the Permittee's quality assurance plan ensure that the Permittee is, at a minimum:

   (a) Maintaining proper functional instruments? Yes✓ No ☐ N/A__ RMK#__

   (b) Using approved sampling/analytical methods? Yes✓ No ☐ N/A__ RMK#__

   (c) Verifying the validity of sampling and analytical procedures and performance of correct calculations? Yes✓ No ☐ N/A__ RMK#__

7. Does the Permittee use a contract laboratory to perform analysis? Yes__ No✓ N/A__ RMK#__

   (a) **If so**, has the Permittee informed the lab in writing that it must operate under the waste analysis conditions as set forth in the permit? [Condition B.3.] Yes__ No ☐ N/A✓ RMK#__

***<u>GENERAL INSPECTION REQUIREMENTS</u>***

1. Is the Permittee following the inspection procedures and schedules described in Section F of the approved permit application and the requirements of O.A.C. Rule 3745-54-15? [Condition B.5] Yes✓ No ☐ N/A__ RMK#__

2. Does the Permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [O.A.C. Rule 3745-54-15(A)(1)(2)] Yes✓ No ☐ N/A___ RMK#_

3. 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 O.A.C. Rule 3745-54-15? Yes✓ No ☐ N/A___ RMK#_

   (a) Is the schedule kept at the facility? [O.A.C. Rule 3745-54-15(B)(2)] Yes✓ No ☐ N/A___ RMK#_

   (b) Does the schedule identify the types of problems which are to be looked for during the inspection? [O.A.C. Rule 3745-54-15(B)(3)] Yes✓ No ☐ N/A___ RMK#_

   (c) Does the schedule include the daily inspection of areas subject to spills when they are in use and according to other applicable regulations when not in use? [O.A.C. Rule 3745-54-15(B)(4)] Yes✓ No ☐ N/A___ RMK#_

4. Does the Permittee remedy deterioration or any malfunctions discovered by an inspection as required by O.A.C. Rule 3745-54-15(C)? [Condition B.5.] Yes✓ No ☐ N/A___ RMK#_

5. Is the Permittee maintaining records of inspections for a minimum of three years? [Condition B.5] Yes✓ No ☐ N/A___ RMK#_

6. In accordance with O.A.C. 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✓ No ☐ N/A___ RMK#_

   (b) Signature of inspector? Yes✓ No ☐ N/A___ RMK#_

   (c) Notation of observations made? Yes✓ No ☐ N/A___ RMK#_

   (d) Date/nature of any repairs or other remedial actions? Yes✓ No ☐ N/A___ RMK#_

## *SECURITY PROVISIONS/FACILITY OPERATION*

1. Is the Permittee complying with the security provisions of O.A.C. Rule 3745-54-14 and Section F of the approved permit application, including the following: [Condition B.4]

   (a) Does the Permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility, or; Yes__ No ☐ N/A ✓ RMK#_

   (b) An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility, or; Yes ✓ No ☐ N/A__ RMK#_

   (c) A means to control entry, at all times, through gates or other entrances, to the active portion of the facility? Yes ✓ No ☐ N/A__ RMK#_

2. In accordance with O.A.C. Rule 3745-54-14(C), does the Permittee have signs reading "Danger-Unauthorized Personnel Keep Out@ posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? [Condition B.4.] Yes ✓ No ☐ N/A__ RMK#_

3. 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 constituents to air, soil ground or surface waters? [Condition B.1.(a)] Yes ✓ No ☐ N/A__ RMK#_

## *PERSONNEL TRAINING*

1. Is the facility conducting personnel training in accordance with Section H of the approved permit application and the following requirements of O.A.C. Rule 3745-54-16: [Condition B.6.] Yes ✓ No ☐ N/A__ RMK#_

   (a) The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [O.A.C. Rule 3745-54-16(A)(3)] Yes ✓ No ☐ N/A__ RMK#_

(b) The facility provides personnel training to new employees within 6 months after their date of employment as required by O.A.C. Rule 3745-54-16(B)? no new hires — Yes__ No ☐ N/A ✓ RMK#_

(c) The facility provides an annual refresher training course as required by O.A.C. Rule 3745-54-16(C)? — Yes ✓ No ☐ N/A__ RMK#_

2. Is the Permittee maintaining personnel training records as required by O.A.C. Rule 3745-54-16(D) including; written job titles, job descriptions, and the type and amount of both introductory and continuing training? [Condition B.6.] — Yes ✓ No ☐ N/A__ RMK#_

3. Are training records kept until closure of the facility in accordance with O.A.C. Rule 3745-54-16(E)? [Condition B.6] — Yes ✓ No ☐ N/A__ RMK#_

## ***REQUIRED EQUIPMENT***

1. Is the Permittee, at a minimum, maintaining the equipment required by O.A.C. Rule 3745-54-32 and the equipment set forth in the approved contingency plan (Section G) of the approved Part B permit application? [Condition B.8.] — Yes ✓ No ☐ N/A__ RMK#_

(a) An internal communication or alarm system? — Yes ✓ No ☐ N/A__ RMK#_

(b) A device, such as a telephone or hand held two-way radio? — Yes ✓ No ☐ N/A__ RMK#_

(c) Portable fire extinguishers or fire control equipment? — Yes ✓ No ☐ N/A__ RMK#_

(d) Water in adequate volumes and pressure to supply water hoses, foam equipment, automatic sprinklers, or water spray systems? — Yes ✓ No ☐ N/A__ RMK#_

2. Is the Permittee inspecting, testing and maintaining the equipment specified in Question #1 to assure its proper operation as specified in O.A.C. Rule 3745-54-33, the inspection plans and Section G of the approved permit application? [Condition B.9.] — Yes ✓ No ☐ N/A__ RMK#_

3. Whenever hazardous waste is being poured, mixed, spread, or otherwise handled 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 O.A.C. Rule 3745-54-34 and Section G of the approved permit application? [Condition B.10.] — Yes ✓ No ☐ N/A__ RMK#_

## *CONTINGENCY PLAN REQUIREMENTS*

### *EMERGENCY PROCEDURES*

1. In compliance with Condition B.12.(a) of the permit, does the Permittee:

   (a) Familiarize the emergency response agencies likely to respond to an emergency at the facility with:

   i. The location and layout of the facility? Yes ✓ No ☐ N/A___ RMK#_

   ii. Properties of hazardous waste managed at the facility and associated hazards? Yes ✓ No ☐ N/A___ RMK#_

   iii. Places where facility personnel will normally be working? Yes ✓ No ☐ N/A___ RMK#_

   iv. Entrances to and roads inside the facility? Yes ✓ No ☐ N/A___ RMK#_

   v. Evacuation routes as depicted in Section G of the permit application? Yes ✓ No ☐ N/A___ RMK#_

   (b) Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the facility, and any further requirements imposed by the permit? and; Yes ✓ No ☐ N/A___ RMK#_

   (c) Familiarize local police and fire departments, hospitals and any other local emergency services, with the properties of hazardous waste managed at the facility and the types of injuries or illness which could result from fires, explosions or a release of hazardous wastes at the facility? Yes ✓ No ☐ N/A___ RMK#_

2. Is the Permittee in compliance with the requirements of O.A.C. Rule 3745-54-56 and Section G of the approved permit application regarding emergency procedures? [Condition B.19.] Yes ✓ No ☐ N/A___ RMK#_

### *EMERGENCY AUTHORITIES*

3. Has a state or local agency declined to enter into the arrangements set forth in O.A.C. Rule 3745-54-37(A)? Yes___ No ✓ N/A___ RMK#_

   (a) **If so,** has the Permittee documented the refusal in the operating record as required by O.A.C. Rule 3745-54-37(B)? [Condition B.12.(b)] Yes___ No ☐ N/A ✓ RMK#_

4. Has the Permittee, in accordance with O.A.C. Rule 3745-54-53 submitted a copy of the approved contingency plan (including amendments, revisions or changes) to all local police departments, fire departments, hospitals, and local emergency response teams that may be called upon to provide emergency services? [Condition B.17.(b)] Yes ✓ No ☐ N/A___ RMK#_

5. Has the Permittee notified the agencies in Question #4, in writing, within (10) days of the effective date of any amendments, revisions or modifications to the contingency plan? [Condition B.17.(b)] none since last inspection Yes___ No ☐ N/A ✓ RMK#_

6. Has the Permittee submitted a copy of the approved contingency plan to the Ohio EPA, Division of Emergency and Remedial Response in accordance with O.A.C. Rule 3745-54-53? [Condition B.17.(c)] Yes ✓ No ☐ N/A___ RMK#_

*EMERGENCY COORDINATOR*

7. Is the Permittee in compliance with the requirements of O.A.C. Rule 3745-54-55 with regard to the emergency coordinator? [Condition B.18.] Yes ✓ No ☐ N/A___ RMK#_

*AMENDMENT OF PLAN*

8. Is the Permittee reviewing the approved contingency plan at least annually and, if necessary, amending the plan in compliance with O.A.C. Rule 3745-54-54? [Condition B.16.] Yes ✓ No ☐ N/A___ RMK#_

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

*IMPLEMENTATION OF PLAN*

9. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents at the facility since date of last inspection as described by Condition B.13. of the permit? Yes___ No ✓ N/A___ RMK#_

(a) **If so,** did the Permittee immediately implement the approved contingency plan and follow the emergency procedures described in O.A.C. Rule 3745-54-56? [Condition B.13.] Yes___ No ☐ N/A ✓ RMK#_

(b) Did the Permittee collect and manage released material, emergency response material and by-products as hazardous waste until such a time that the Permittee was able to demonstrate that such waste was not hazardous in accordance with O.A..C. Rules 3745-51-03(C) and (D)? [Condition B.15.] Yes__ No ☐ N/A ✓ RMK#_

(c) Within (15) days of the incident did the Permittee submit, to the Director, a written report of the incident containing the following information:

i. Name, address, and telephone number of the owner or operator? Yes__ No ☐ N/A ✓ RMK#_

ii. Name, address, and telephone number of the facility? Yes__ No ☐ N/A ✓ RMK#_

iii. Date, time, and type of incident (e.g. fire, explosion)? Yes__ No ☐ N/A ✓ RMK#_

iv. Name an quantity of material involved? Yes__ No ☐ N/A ✓ RMK#_

v. The extent of injuries, if any? Yes__ No ☐ N/A ✓ RMK#_

vi. An assessment of actual or potential hazards to human health and the environment? Yes__ No ☐ N/A ✓ RMK#_

vii. Estimated quantity and disposition of recovered material that resulted from the incident? Yes__ No ☐ N/A ✓ RMK#_

viii. Any other information as the Director may require? Yes__ No ☐ N/A ✓ RMK#_

***NOTE:*** See also Conditions A.21. and A.22. of the permit for additional reporting/recordkeeping requirements.

(d) Did the Permittee note in the operating record the time, date and details of any incident that required the implementation of the approved contingency plan? [Condition B.22.] Yes__ No ☐ N/A ✓ RMK#_

***REMARKS***

## *CLOSURE REQUIREMENTS*

### *CLOSURE PLAN/AMENDMENT*

1. Is the Permittee maintaining at the facility, the approved closure plan which contains the elements set forth in O.A.C. Rule 3745-55-12? [Condition B.28.] Yes ✓ No ☐ N/A___ RMK#_

2. Has the Permittee amended the closure plan? No

   (a) **If so,** has the plan been amended in accordance with O.A.C. Rule 3745-55-12(C)? [Condition B.27.] Yes___ No ☐ N/A ✓ RMK#_

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

### *CLOSURE ACTIVITIES*

3. Has the facility been closed? No

   (a) **If so,** was closure conducted in accordance with approved closure plan and the closure performance standard of O.A.C. Rule 3745-55-11? [Condition B.25.] Yes___ No ☐ N/A ✓ RMK#_

   (b) After receiving the final volume of hazardous waste, did the Permittee remove from the facility or treat or dispose of on site all hazardous waste in accordance with the approved closure plan within (90) days? [Condition B.30.] Yes___ No ☐ N/A ✓ RMK#_

   (c) Were all closure activities completed within (180) days, in accordance with O.A.C. Rule 3745-55-13? [Condition B.30.] Yes___ No ☐ N/A ✓ RMK#_

   (d) Has the Permittee decontaminated and/or disposed of all facility equipment, structures and soils as required by O.A.C. Rule 3745-55-14 and the approved closure plan? [Condition B.31.(a)] Yes___ No ☐ N/A ✓ RMK#_

   (e) Did the Permittee notify Ohio EPA's Northeast District Office, within five (5) working days prior to all rinseate and soil sampling? [Condition B.31.(b)] Yes___ No ☐ N/A ✓ RMK#_

(f) Has the Permittee and an independent, qualified, registered professional engineer certified that the facility has been closed in accordance with the specifications in the approved closure plan as required by O.A.C. Rule 3745-55-15? [Condition B.32.] Yes__ No ☐ N/A ✓ RMK#_

## *REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES*

1. Is the Permittee following the procedures as specified in O.A.C. Rules 3745-54-17, 3745-55-77 and Section F of the approved application when managing ignitable, reactive and/or incompatible wastes? [Condition B.7.(a) and Condition C.10.] Yes ✓ No ☐ N/A__ RMK#_

   (a) Is electrical grounding provided for all container and tanks, and transport vehicles during all operations involving the handling of ignitable or reactive wastes? [Condition B.7.(b)] Yes ✓ No ☐ N/A__ RMK#_

   (b) Are spark proof tools used during all operations involving the handling of all ignitible or reactive wastes? [Condition B.7.(c)] Yes ✓ No ☐ N/A__ RMK#_

   (c) Does the Permittee prohibit smoking and open flames in areas where hazardous wastes are managed and post appropriate signs? [Condition B.7.(d)] Yes ✓ No ☐ N/A__ RMK#_

   (d) Are hazardous wastes placed in unwashed containers that previously held an incompatible waste or material? [Condition C.10.(b)] Yes ☐ No ✓ N/A__ RMK#_

   (e) Are containers of incompatible wastes separated from one another? [Condition C.10.(c)] Yes ✓ No ☐ N/A__ RMK#_

2. As required by O.A.C. Rule 3745-55-76 does the Permittee store containers of ignitable or reactive wastes greater than 15 ~~feet~~ meters (50 feet) from the facility's property line? [Condition C.9.(a)] Yes ✓ No ☐ N/A__ RMK#_

3. Does the Permittee take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and follow the storage procedures as specified in Section F of the approved permit application? [Condition C.9.(b)] Yes ✓ No ☐ N/A__ RMK#_

## *STORAGE OF HAZARDOUS WASTES IN CONTAINERS*

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

1. Is the Permittee storing in containers, only those wastes as specified in Condition C.2. of the permit? [Condition C.2.] Yes ✓ No ☐ N/A___ RMK#_

2. Does the Permittee limit the total quantity of containerized waste in the container storage area to 71,500 gallons at any given time (maximum container storage inventory of (1300) 55-gallon drums)? [Condition C. and C.1.(a)] Yes ✓ No ☐ N/A___ RMK#_

*NOTE:* For the purposes of compliance with the capacity limitation of the permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity. For example, a fifty-five (55) gallon drum will be considered to be holding 55 gallons of waste, regardless of the actual quantity stored in the drum. [Condition C.1.(b)]

3. When accumulating waste within the permitted container storage area, does the Permittee ensure that the total amount of waste (both more than 90 day and less than 90 day) does not exceed the maximum container storage inventory established under Condition C.1.? [Condition C.1.(c)] Yes ✓ No ☐ N/A___ RMK#_

4. Are hazardous wastes, subject to regulation by the permit, stored only at the designated container storage area described in the approved permit application? [Condition C.1.(a)] Yes ✓ No ☐ N/A___ RMK#_

5. Does the Permittee limit storage of hazardous waste to no more than one year? [O.A.C. Rule 3745-59-50(B)] Yes ✓ No ☐ N/A___ RMK#_

6. Is each container stored clearly marked to identify its contents and the date each period of accumulation/storage begins? [O.A.C. Rule 3745-59-50(A)(2)(a)] Yes ✓ No ☐ N/A___ RMK#_

7. Does the Permittee store hazardous waste in the types of containers described in Section D-2b of the approved permit application? [Condition C.1.(a)] Yes ✓ No ☐ N/A___ RMK#_

*CONDITION OF CONTAINERS*

8. Are containers holding hazardous wastes in good condition? [Condition C.3.] Yes✓ No ☐ N/A___ RMK#_

   (a) **If not,** (e.g. severe rusting, structural defects) did the Permittee transfer the hazardous waste from such a container to a container that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit or the hazardous waste facility chapters of the O.A.C.? [Condition C.3.] Yes___ No ☐ N/A✓ RMK#_

9. Does the Permittee ensure that all containers used at the facility are compatible with the hazardous waste to be stored in them as required by O.A.C. Rule 3745-55-72? [Condition C.4.] Yes✓ No ☐ N/A___ RMK#_

10. Is storage conducted in the container storage containment system as described in Condition C.1 of the permit and Section D of the approved permit application? [Condition C.5.(a)] Yes✓ No ☐ N/A___ RMK#_

11. Does the Permittee keep all containers closed during storage except when it is necessary to add or remove waste as required by O.A.C. Rule 3745-55-73? [Condition C.5.(b)] Yes✓ No ☐ N/A___ RMK#_

12. Are containers handled and stored in a manner which prevents ruptures and leaks? [Condition C.5.(b)] Yes✓ No ☐ N/A___ RMK#_

13. Are lab-pack wastes handled in compliance with the applicable storage requirements? [Condition C.5.(c)] Yes✓ No ☐ N/A___ RMK#_

14. Are lab pack wastes packaged in drums containing absorbent material that is compatible with the wastes? [Condition C.5.(d)] Yes✓ No ☐ N/A___ RMK#_

15. Does the Permittee prevent stacking of drums more than 3 high as required by the Part B application? Yes✓ No ☐ N/A___ RMK#_

*INSPECTIONS*

16. Is the Permittee inspecting the container area weekly in accordance with O.A.C. Rule 3745-55-74 and the approved

inspection schedule (Section F) to detect leaking containers and deterioration of containers and the containment system? [Condition C.7.] Yes✓ No ☐ N/A___ RMK#_

(a) Does the Permittee note the results of these inspections in the inspection log along with any remedial action taken? [Condition C.7.] Yes✓ No ☐ N/A___ RMK#_

*CONTAINMENT SYSTEM*

17. Does the Permittee maintain the containment system as described in the approved permit application, including: [Condition C.6.] Yes✓ No ☐ N/A___ RMK#_

(a) Sufficient design to contain ten percent of the total volume of the containers or the volume of the largest contained, whichever is greater? Yes✓ No ☐ N/A___ RMK#_

(b) A system which is free of cracks and gaps and sufficiently impervious to contain leaks and spills and accumulated precipitation until the collected material is detected and removed? Yes✓ No ☐ N/A___ RMK#_

(c) Equipped with a coating which is compatible with each waste stored in the area? Yes✓ No ☐ N/A___ RMK#_

(d) *For those wastes which are deemed incompatible with liner material:* Has the Permittee installed a separate secondary containment structure within the existing structure which is equipped with a compatible liner? Yes___ No ☐ N/A✓ RMK#_

18. Has the Permittee had a spill or leak of wastes or an accumulation of precipitation in the containment system? Yes✓ No___ N/A___ RMK#_

(a) **If so,** are spilled or leaked wastes and accumulated precipitation removed from the sump or collection area in a timely manner? [Condition C.6.(c)] Yes✓ No ☐ N/A___ RMK#_

(b) Does removal of spilled/leaked wastes and accumulated precipitation occur within (24) hours from the time the spilled or leak waste is discovered? [Condition C.6.(c)] Yes✓ No ☐ N/A___ RMK#_

*REQUIRED AISLE SPACE*

19. Is the Permittee maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to any area of the facility operation in an emergency as required by O.A.C. Rule 3745-54-35? [Condition B.11.] Yes ✓ No ☐ N/A___ RMK#_

*CLOSURE AND POST-CLOSURE*

20. At closure of the container storage area, did the Permittee remove all hazardous waste and hazardous waste residues from the containment system, in accordance with the procedures set forth in the approved closure plan (Section I of the permit application)? [Condition C.11.(a)] Yes___ No ☐ N/A ✓ RMK#_

21. During closure, if the Permittee could not demonstrate that all contaminated soils could be removed or decontaminated, did the Permittee close the unit and perform post-closure care following a plan approved by the Director of the Ohio EPA? [Condition C.11.(b)] Yes___ No ☐ N/A ✓ RMK#_

## *HAZARDOUS WASTE TANK STORAGE*

***NOTE:*** Please see Condition D of the permit for a description of tank storage, treatment, and management practices permitted at the facility. Existing tanks at the facility are: 1, 2, 21, 22, 23, 101, 102, 103, 104, 105, 106, 107, 108 and 109. Total volume of waste permitted for management in tanks 1-2, 21-23, and 101-109 is 156,000 gallons.

1. Does the Permittee store only those hazardous wastes in the tanks as specified in Condition D.1. of the permit? Yes ✓ No ☐ N/A___ RMK#_

2. Does the Permittee limit total volume of waste managed in permitted tanks to 156,000 gallons? [Condition D.1.(a)] Yes ✓ No ☐ N/A___ RMK#_

3. Are only those hazardous waste codes as specified in the approved permit application and as summarized in Condition D.1.(c) managed in the hazardous waste tanks? [Condition D.1.(c)] Yes ✓ No ☐ N/A___ RMK#_

*SECONDARY CONTAINMENT*

4. Was the secondary containment system constructed and being operated in accordance with the requirements of

O.A.C. Rule 3745-55-93(B) through (F) and Section D of the Part B application? [Condition D.4.] Yes✓ No ☐ N/A__ RMK#_

*CERTIFICATION OF TANK SYSTEMS*

5. Were tank systems constructed in accordance with Section D of the approved part B application, and prior to operation was the installation of the tank system certified in accordance with O.A.C. Rule 3745-55-92(B) to ensure that proper handling procedures were adhered to in order to prevent damage to the system during installation? Yes✓ No ☐ N/A__ RMK#_

*OPERATING REQUIREMENTS*

6. Does the Permittee prohibit the placement of hazardous waste in the tank systems if such placement would cause the tank or its ancillary equipment to rupture, leak, corrode, or otherwise fail? [Condition D.5.(a)] Yes✓ No ☐ N/A__ RMK#_

7. Does the Permittee use the methods described in the Part B application to prevent spills and overflows from the tank systems? [Condition D.5.(b)] Yes✓ No ☐ N/A__ RMK#_

*RESPONSES TO LEAKS/SPILLS*

8. Has there been a leak or spill from the hazardous waste tank system(s) or secondary containment, or has a tank system(s) become unfit for continued use since date of last inspection? Yes__ No✓ N/A__ RMK#_

(a) **If so,** did the Permittee follow the requirements of O.A.C. Rule 3745-55-96 and the procedures outlined in Condition D.7.(a) and D.7.(b) of the permit? [Condition D.7.] Yes__ No ☐ N/A✓ RMK#_

(b) *If the emergency procedures specified in Permit Condition D.7.(b)(i) through D.7.(b)(iv) were not followed:* Did the Permittee close the system in accordance with the closure plan? [Condition D.7.(b)] Yes__ No ☐ N/A✓ RMK#_

(c) *For all major repairs to the system:* Did the Permittee obtain a certification by a independent, qualified, registered P.E. attesting that the repaired system was

capable of handling hazardous waste? [Condition D.7.(c)] Yes__ No ☐ N/A ✓ RMK#_

i. Did the Permittee submit certification of major repairs to the Director within 7 days from returning the tank system to use? [Condition D.7.(c)] Yes__ No ☐ N/A ✓ RMK#_

***NOTE:*** As specified in Condition D.7., examples of major repairs include: installation of an internal liner, repair of a ruptured tank or repair or replacement of a secondary containment vault.

(d) Did the Permittee comply with the reporting requirements as specified in Condition D.8. of the permit? Yes__ No ☐ N/A ✓ RMK#_

***TANK SYSTEM INSPECTION REQUIREMENTS***

9. Does the Permittee inspect the tank systems in accordance with the inspection schedule, including:

(a) Inspection of overfill controls in accordance with the procedures specified in the permit application? [Condition D.6.(b)] Yes ✓ No ☐ N/A__ RMK#_

(b) Daily inspection of the above ground portion of the tank systems to detect corrosion or release of wastes? [Condition D.6.(c)(i)] Yes__ No ☑ N/A__ RMK#_

(c) Daily evaluation of data gathered from monitoring and leak detection equipment (e.g. pressure or temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design? [Condition D.6.(c)(ii)] Yes__ No ☑ N/A__ RMK#_

(d) Daily inspection of construction materials and area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, to detect erosion or signs of release of hazardous waste (e.g. wet spots, dead vegetation)? [Condition D.6.(c)(iii)] Yes__ No ☑ N/A__ RMK#_

10. Does the Permittee document tank system inspections in the operating record of the facility in accordance with Condition D.6.(e) of the permit? Yes ✓ No ☐ N/A__ RMK#_

## *SPECIAL PROVISIONS FOR IGNITABLE/REACTIVE/INCOMPATIBLE WASTES*

11. Does the Permittee ensure that ignitable or reactive wastes are not placed in the tank or secondary containment system unless the procedures as specified in the Part B permit application have first been followed? [Condition D.10.(a)] Yes ✓ No ☐ N/A__ RMK#_

    (a) Did the Permittee document compliance with this condition in the operating record of the facility? [Condition D.10.(a)] Yes ✓ No ☐ N/A__ RMK#_

12. Is the Permittee in compliance with the requirements for maintaining protective distances between the waste management areas and public areas as required in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1991 or most recent edition) incorporated by reference in OAC Rule 3745-50-11? [Condition D.10.(b)] Yes ✓ No ☐ N/A__ RMK#_

13. Does the Permittee ensure that no incompatible wastes are placed in the tank system or secondary containment system until the procedures as specified in the Part B permit application are first followed? [Condition D.11.(a)] Yes ✓ No ☐ N/A__ RMK#_

    (a) Has the Permittee documented compliance with this requirement in the facility's operating record? [Condition D.11.(a)] Yes ✓ No ☐ N/A__ RMK#_

14. Does the Permittee ensure that incompatible wastes are not placed in the tank without first decontaminating the unit? [Condition D.11.(b)] Yes ✓ No ☐ N/A__ RMK#_

## *TANK SYSTEM CLOSURE/POST-CLOSURE*

15. At closure, did the Permittee follow the procedures as set forth in the approved closure plan? [Condition D.9.(a)] Yes__ No ☐ N/A ✓ RMK#_

16. If the Permittee was unable to remove and/or decontaminate contaminated soils during closure, has the Permittee closed the tank system and implemented post-closure care as specified by the contingent procedures of the closure plan and in the post-closure plan? [Condition D.9.(b)] Yes__ No ☐ N/A ✓ RMK#_

*RECORDKEEPING REQUIREMENTS*

17. Does the Permittee maintain at the facility the written certification statements for the design and installation of the tank system? [Condition D.8.(d)] Yes ✓ No ☐ N/A__ RMK#_

## *CORRECTIVE ACTIONS*

1. Has the Permittee instituted corrective action as necessary to protect human health and the environment in accordance with O.A.C. Rule 3745-55-011? [Condition E.1.] Yes__ No ☐ N/A ✓ RMK#_

   (a) Has corrective action been implemented beyond the facility property boundary, where necessary to protect human health and the environment? [Condition E.2.] Yes__ No ☐ N/A ✓ RMK#_

## *LAND DISPOSAL RESTRICTION REQUIREMENTS*

***NOTE:*** *In order to determine compliance with all applicable LDR requirements the inspector may need to complete the separate LDR checklist:*

1. Does the permittee comply with all applicable regulations regarding land disposal prohibitions and restrictions as required by OAC Chapter 3745-270? Yes ✓ No ☐ N/A___ RMK#_

2. Does the permittee comply with the notification and certification requirements of OAC rule 3745-270-07(A)? Yes ✓ No ☐ N/A___ RMK#_

3. 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 ✓ No ☐ N/A___ RMK#_

4. 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 ✓ No ☐ N/A___ RMK#_

   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 ✓ No ☐ N/A___ RMK#_

5. 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 ✓ No ☐ N/A___ RMK#_

**REMARKS**

| SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS – BATTERIES AND LAMPS | | | |
|---|---|---|---|
| ***Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more*** | | | |
| ***Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less*** | | | |
| **PROHIBITIONS** | | | |
| 1. | Did the SQUWH dispose of universal waste? [3745-273-11(A)] | | Yes ☐ No ☒ N/A ☐ |
| 2. | Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)] | | Yes ☐ No ☒ N/A ☐ |
| **WASTE MANAGEMENT AND LABELING/MARKING** | | | |
| **UNIVERSAL WASTE BATTERIES** | | | |
| 3. | Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] | | Yes ☐ No ☐ N/A ☒ |
| 4. | If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] | | Yes ☐ No ☐ N/A ☒ |
| 5. | Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)] | | Yes ☐ No ☐ N/A ☒ |
| 6. | If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)] | | Yes ☐ No ☐ N/A ☒ |
| | a. | If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] | Yes ☐ No ☐ N/A ☒ |
| | b. | If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] | Yes ☐ No ☐ N/A ☒ |
| 7. | Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-14(A)] | | Yes ☐ No ☐ N/A ☒ |
| **UNIVERSAL WASTE LAMPS** | | | |
| 8. | Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] | | Yes ☒ No ☐ N/A ☐ |
| 9. | Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] | | Yes ☐ No ☐ N/A ☒ |
| *NOTE:* ***Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)].*** *A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.* | | | |
| 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 ☒ No ☐ N/A ☐ |

| | | | |
|---|---|---|---|
| **ACCUMULATION TIME** | | | |
| 11. | Is the waste accumulated for less than one year? [3745-273-15(A)] | | Yes ☒ No ☐ N/A ☐ |
| | a. | If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] | Yes ☐ No ☐ N/A ☒ |
| *NOTE: Accumulation is defined as date generated or date received from another handler.* | | | |
| 12. | Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)]<br><br>If yes, describe below: | | Yes ☒ No ☐ N/A ☐ |
| **EMPLOYEE TRAINING** | | | |
| 13. | Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] | | Yes ☒ No ☐ N/A ☐ |
| **RESPONSE TO RELEASES** | | | |
| 14. | Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] | | Yes ☐ No ☐ N/A ☒ |
| 15. | Is the material released characterized? [3745-273-17(B)] | | Yes ☐ No ☐ N/A ☒ |
| 16. | If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)] | | Yes ☐ No ☐ N/A ☒ |
| **OFF-SITE SHIPMENTS** | | | |
| *NOTE: If a SQUWH self-transports waste, then the handler must comply with the Universal Waste transporter requirements.* | | | |
| 17. | Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] | | Yes ☒ No ☐ N/A ☐ |
| 18. | Is the handler aware of DOT requirements for packaging and shipping?<br><br>If no, make aware of 49 CFR 171-180. | | Yes ☐ No ☐ N/A ☐ |
| 19. | Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)] | | Yes ☒ No ☐ N/A ☐ |
| 20. | Has the originating handler ever had an off-site shipment rejected by another handler or destination facility? | | Yes ☐ No ☒ N/A ☐ |
| | a. | If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)] | Yes ☐ No ☐ N/A ☒ |
| 21. | If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u>: | | Yes ☐ No ☐ N/A ☒ |
| | a. | Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)] | Yes ☐ No ☐ N/A ☒ |
| 22. | If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] | | Yes ☐ No ☐ N/A ☒ |
| **EXPORTS** | | | |

| | | | |
|---|---|---|---|
| 23. | Is waste being sent to a foreign destination? If so: | | Yes ☐ No ☒ N/A ☐ |
| | a. | Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] | Yes ☐ No ☐ N/A ☒ |
| | b. | Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)] | Yes ☐ No ☐ N/A ☒ |
| | c. | Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] | Yes ☐ No ☐ N/A ☒ |

## USED OIL INSPECTION CHECKLIST - MARKETERS

*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 Used Oil Marketer manage used oil in a surface impoundment or waste pile? If yes: | Yes ☐ No ☒ N/A ☐ |
| | a. | Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] | Yes ☐ No ☐ N/A ☒ |

*NOTE: For example, scrap metal contaminated with used oil or used oil managed in a surface impoundment (i.e., pond).*

| | | | |
|---|---|---|---|
| 2. | | Is used oil used as a dust suppressant? [3745-279-12(B)] | Yes ☐ No ☒ N/A ☐ |
| 3. | | Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? | Yes ☐ No ☐ N/A ☒ |

*NOTE: All used oil burned for energy recovery is presumed to be off-specification until all requirements of OAC rule 3745-279-11 have been met.*

*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).*

| | | | |
|---|---|---|---|
| 4. | | Does the used oil fuel marketer initiate shipments of **off-spec** used oil only to a used oil burner that has a U.S. EPA ID# and burns the used oil in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-71] | Yes ☒ No ☐ N/A ☐ |
| 5. | | Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil meets the specification for used oil fuel under 3745-279-11 keep copies of analyses of the used oil (or other information used to make the determination) for at least three years? [3745-279-72(B)] | Yes ☒ No ☐ N/A ☐ |
| 6. | | Has the used oil marketer notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-73(A)] | Yes ☒ No ☐ N/A ☐ |
| 7. | | Does the used oil marketer keep a record of each shipment of **off-spec** used oil directed to a used oil burner? [3745-279-74(A)] | Yes ☒ No ☐ N/A ☐ |
| | a. | Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-74(A)(1)] | Yes ☒ No ☐ N/A ☐ |
| | b. | Does each record include the name and address of the burner who receives the oil? [3745-279-74(A)(2)] | Yes ☒ No ☐ N/A ☐ |
| | c. | Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-74(A)(3)] | Yes ☒ No ☐ N/A ☐ |
| | d. | Does each record include the U.S. EPA ID# of the burner? [3745-279-74(A)(4)] | Yes ☒ No ☐ N/A ☐ |
| | e. | Does each record include the quantity of the used oil shipped? [3745-279-74(A)(5)] | Yes ☒ No ☐ N/A ☐ |
| | f. | Does each record include the date of shipment? [3745-279-74(A)(6)] | Yes ☒ No ☐ N/A ☐ |
| 8. | | Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil **meets the fuel specifications** under 3745-279-11 keep a record of each shipment of used oil to an on-spec used oil burner? [3745-279-74(B)] | Yes ☒ No ☐ N/A ☐ |
| | a. | Does each record include the name and address of the facility receiving the shipment? [3745-279-74(B)(1)] | Yes ☒ No ☐ N/A ☐ |
| | b. | Does each record include quantity of used oil fuel delivered? [3745-279-74(B)(2)] | Yes ☒ No ☐ N/A ☐ |
| | c. | Does each record include date of shipment or delivery? [3745-279-74(B)(3)] | Yes ☒ No ☐ N/A ☐ |
| | d. | Does each record include a cross-reference to the record of used oil | Yes ☒ No ☐ N/A ☐ |

| | | | |
|---|---|---|---|
| | | analysis or other information used to make the determination that the used oil meets the specification as required in 3745-279-72(A)? [3745-279-74(B)(4)] | |
| 9. | Are the records described in 3745-279-74(A) and (B) maintained for at least three years? [3745-279-74(C)] | | Yes ☒ No ☐ N/A ☐ |
| 10. | Before the used oil generator, transporter or processor/re-refiner directs the first shipment of **off-spec** used oil to a burner, does he obtain a one time written and signed notice from the burner certifying that: | | Yes ☒ No ☐ N/A ☐ |
| | a. | The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-279-75(A)(1)] | Yes ☒ No ☐ N/A ☐ |
| | b. | The burner will burn the off-spec used oil only in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-75(A)(2)] | Yes ☒ No ☐ N/A ☐ |
| 11. | Is the certification maintained for at least three years from the date the last shipment of off-spec used oil was shipped to the burner? [3745-279-75(B)] | | Yes ☒ No ☐ N/A ☐ |

| GENERATOR LDR CHECKLIST<br>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 ☐ No ☐ N/A ☒ |
| 2. | Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not, | | | Yes ☐ No ☐ N/A ☒ |
| | a. | Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)] | | Yes ☐ No ☐ N/A ☒ |
| *NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).* | | | | |
| 3. | Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)] | | | Yes ☐ No ☐ N/A ☒ |
| 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 ☐ No ☐ N/A ☒ |
| 5. | Does the generator generate a listed HW that exhibits a characteristic? If yes, | | | Yes ☒ No ☐ N/A ☐ |
| | 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 ☒ No ☐ N/A ☐ |
| *FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.* | | | | |
| 6. | Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)] | | | Yes ☒ No ☐ N/A ☐ |
| *NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.* | | | | |
| *NOTE: Written documentation of this determination is not required.* | | | | |
| 7. | Did the generator treat his HW /soil on-site <u>to meet</u> the LDR treatment standard? | | | Yes ☐ No ☐ N/A ☒ |
| *NOTE: If "Yes" see question #16.* | | | | |
| 8. | Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)] | | | Yes ☒ No ☐ N/A ☐ |
| | a. | If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include: | | Yes ☐ No ☐ N/A ☒ |
| | | i | Applicable HW codes? | Yes ☐ No ☐ N/A ☒ |
| | | ii | Manifest number of the first shipment to the TSD? | Yes ☐ No ☐ N/A ☒ |
| | | iii | A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination."? | Yes ☐ No ☐ N/A ☒ |
| 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 ☒ No ☐ N/A ☐ |
| 10. | Does the generator have a copy of the LDR notification form/notice on file? [3745-270-07(A)(2)] | | | Yes ☒ No ☐ N/A ☐ |
| | a. | Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)] | | Yes ☒ No ☐ N/A ☐ |

| 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 ☒ No ☐ N/A ☐ |
| | b. | Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)] | | Yes ☒ No ☐ N/A ☐ |
| | 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 ☒ No ☐ N/A ☐ |
| | d. | A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)] | | Yes ☒ No ☐ N/A ☐ |
| *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 ☒ No ☐ N/A ☐ |
| *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 ☒ No ☐ N/A ☐ |
| *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 ☒ No ☐ N/A ☐ |
| *NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.* | | | | |
| **PROHIBITED DILUTION** | | | | |
| 12. | Is the HW treated by burning?<br><br>If "No" go to #15. | | | Yes ☒ No ☐ N/A ☐ |
| 13. | Is the HW a metal-bearing HW? | | | Yes ☒ No ☐ N/A ☐ |
| *NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.* | | | | |
| 14. | a. | Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless **one** of the following conditions apply. [3745-270-03(c)] | | |
| | | i. | Contains > 1% TOC? | Yes ☐ No ☐ N/A ☒ |
| | | ii. | Contains organic constituents or cyanide at levels greater than the UTS levels? | Yes ☐ No ☐ N/A ☒ |
| | | iii. | Is made up of combustible material e.g., paper, wood, plastic? | Yes ☐ No ☐ N/A ☒ |
| | | iv. | Has a reasonable heating value (e.g., > 5000 Btu)? | Yes ☐ No ☐ N/A ☒ |
| | | v. | Co-generated with a HW that must be combusted? | Yes ☐ No ☐ N/A ☒ |
| | b. | If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution? | | Yes ☐ No ☐ N/A ☒ |
| 15. | Was the HW treated by wastewater treatment? | | | Yes ☐ No ☒ N/A ☐ |
| | 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 ☐ No ☐ N/A ☒ |

| | | | | |
|---|---|---|---|---|
| *NOTE: If "Yes", HW is improperly being treated by dilution.* | | | | |
| | b. | Does the waste carry the D001 code <u>and</u> contain ≥10% TOC? | | Yes ☐ No ☐ N/A ☒ |
| | c. | Does the wastewater treatment process include a process to separate/recover the organic phase of the waste? | | Yes ☐ No ☐ N/A ☒ |
| *NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].* | | | | |
| *NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.* | | | | |
| **GENERATOR TREATMENT** | | | | |
| 16. | Does the generator treat to meet LDRs on-site? | | | Yes ☐ No ☒ N/A ☐ |
| | 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 ☐ No ☐ N/A ☒ |
| | If "Yes"...complete the rest of the checklist. If "No"...stop...you are done. | | | |
| | a. | Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)] | | Yes ☐ No ☐ N/A ☒ |
| | 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 ☐ No ☐ N/A ☒ |
| *NOTE: This is a laboratory analysis but it does not have to be kept by the generator.* | | | | |
| | 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 ☐ No ☐ N/A ☒ |
| | 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 ☐ No ☐ N/A ☒ |
| | e. | Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)] | | Yes ☐ No ☐ N/A ☒ |
| | f. | Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)] | | Yes ☐ No ☐ N/A ☒ |
| **NOTIFICATION FORM FOR GENERATOR TREATMENT** | | | | |
| 17. | a. | Contains all information in #11 a-g above and | | Yes ☒ No ☐ N/A ☐ |
| | b. | If the treated HW/soil is listed.....notification contains the following certification statement:<br><br>"I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment." | | Yes ☐ No ☐ N/A ☒ |
| | c. | If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator: | | |
| | | i. | Prepare a one-time notification? [3745-270-09 (D)] | Yes ☐ No ☐ N/A ☒ |
| | | ii. | Maintain a copy of the notice onsite? [3745-270-09(D)] | Yes ☐ No ☐ N/A ☒ |
| | | iii. | Include in the notification: [3745-270-09(D)] | |
| | | | 1. Name & address of receiving landfill? | Yes ☐ No ☐ N/A ☒ |
| | | | 2. Description of HW when generated? | Yes ☐ No ☐ N/A ☒ |
| | | | 3. HW code when generated? | Yes ☐ No ☐ N/A ☒ |

| | | | | | |
|---|---|---|---|---|---|
| | | | 4. | Treatability group when generated? | Yes ☐ No ☐ N/A ☒ |
| | | | 5. | Underlying hazardous constituents present when generated? | Yes ☐ No ☐ N/A ☒ |
| | | iv. | Contain the certification statement as required by 3745-270-07(B)(4)? | | Yes ☐ No ☐ N/A ☒ |

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

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

Safety Equipment Used:

**GENERAL REQUIREMENTS**

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| 1. | Have all wastes generated at the facility been adequately evaluated? [3745-52-11] | | Yes | ☒ | No | ☐ | N/A | ☐ |
| 2. | Are records of waste determination being kept for at least 3 years? [3745-52-40(C)] | | Yes | ☒ | No | ☐ | N/A | ☐ |
| 3. | Has the generator obtained a U.S. EPA identification number? [3745-52-12] | | Yes | ☒ | No | ☐ | N/A | ☐ |
| 4. | Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] | | Yes | ☒ | No | ☐ | N/A | ☐ |
| 5. | Are annual reports kept on file for at least 3 years? [3745-52-40(B)] | | Yes | ☒ | No | ☐ | N/A | ☐ |
| 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 | ☐ | No | ☒ | N/A | ☐ |
| 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 | ☐ | No | ☒ | N/A | ☐ |
| 8. | Does the generator accumulate hazardous waste? | | Yes | ☒ | No | ☐ | N/A | ☐ |
| *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 | ☐ | No | ☒ | N/A | ☐ |
| *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 | ☐ | No | ☐ | N/A | ☒ |
| | b. | Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)? | Yes | ☒ | No | ☐ | N/A | ☐ |
| | c. | Drip pads that meet 3745-69-40 to 3745-69-45? | Yes | ☐ | No | ☐ | N/A | ☒ |
| | d. | Containment building that meets 3745-256-100 to 3745-256-102? | Yes | ☐ | No | ☐ | N/A | ☒ |
| *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 | ☒ | No | ☐ | N/A | ☐ |
| | a. | Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] | Yes | ☒ | No | ☐ | N/A | ☐ |
| | b. | Has the generator complied with special manifest requirements? [3745-52-54] | Yes | ☒ | No | ☐ | N/A | ☐ |
| | c. | For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] | Yes | ☐ | No | ☐ | N/A | ☒ |
| | d. | Has an annual report been submitted to U.S. EPA? [3745-52-56] | Yes | ☒ | No | ☐ | N/A | ☐ |

| | | | |
|---|---|---|---|
| | e. | Are export related documents being maintained on-site? [3745-52-57(A)] | Yes ☒ No ☐ N/A ☐ |
| **MANIFEST REQUIREMENTS** | | | |
| 12. | | Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)] | Yes ☒ No ☐ N/A ☐ |
| 13. | | Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)] | Yes ☒ No ☐ N/A ☐ |
| *NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]* | | | |
| 14. | | Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] | Yes ☒ No ☐ N/A ☐ |
| *NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]* | | | |
| 15. | | If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] | Yes ☐ No ☐ N/A ☒ |
| 16. | | Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)] | Yes ☒ No ☐ N/A ☐ |
| *NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.* | | | |
| 17. | | If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)] | Yes ☐ No ☐ N/A ☒ |
| 18. | | If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] | Yes ☐ No ☐ N/A ☒ |
| 19. | | If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] | Yes ☐ No ☐ N/A ☒ |
| 20. | | Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] | Yes ☒ No ☐ N/A ☐ |
| *NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.* | | | |
| **PERSONNEL TRAINING** | | | |
| 21. | | Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] | Yes ☒ No ☐ N/A ☐ |
| 22. | | Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)] | Yes ☒ No ☐ N/A ☐ |
| *NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]* | | | |
| 23. | | Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] | Yes ☒ No ☐ N/A ☐ |
| 24. | | Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] | Yes ☐ No ☐ N/A ☒ |
| 25. | | Does the generator provide annual refresher training to employees? [3745-65-16(C)] | Yes ☒ No ☐ N/A ☐ |

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|---|---|---|---|
| 26. | Does the generator keep records and documentation of: | | |
| | a. | Job titles? [3745-65-16(D)(1)] | Yes ☒ No ☐ N/A ☐ |
| | b. | Job descriptions? [3745-65-16(D)(2)] | Yes ☒ No ☐ N/A ☐ |
| | c. | Type and amount of training given to each person? [3745-65-16(D)(3)] | Yes ☒ No ☐ N/A ☐ |
| | d. | Completed training or job experience required? [3745-65-16(D)(4)] | Yes ☒ No ☐ N/A ☐ |
| 27. | Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] | | Yes ☒ No ☐ N/A ☐ |

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

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

**CONTINGENCY PLAN**

| | | | |
|---|---|---|---|
| 28. | Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] | | Yes ☒ No ☐ N/A ☐ |
| 29. | Does the plan describe the following: | | |
| | a. | Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)] | Yes ☒ No ☐ N/A ☐ |
| | b. | Arrangements with emergency authorities? [3745-65-52(C)] | Yes ☒ No ☐ N/A ☐ |
| | c. | A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] | Yes ☒ No ☐ N/A ☐ |
| | d. | A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] | Yes ☒ No ☐ N/A ☐ |
| | e. | An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] | Yes ☒ No ☐ N/A ☐ |

*NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]*

| | | |
|---|---|---|
| 30. | Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)] | Yes ☒ No ☐ N/A ☐ |
| 31. | Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] | Yes ☒ No ☐ N/A ☐ |
| 32. | Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] | Yes ☒ No ☐ N/A ☐ |

*NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.*

| EMERGENCY PROCEDURES | | | |
|---|---|---|---|
| 33. | Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: | | Yes ☐ No ☒ N/A ☐ |
| | a. | Was the contingency plan implemented? [3745-65-51(B)] | Yes ☐ No ☐ N/A ☒ |
| | b. | Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? | Yes ☐ No ☐ N/A ☒ |
| | c. | Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)? | Yes ☐ No ☐ N/A ☒ |
| *NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.* | | | |
| **PREPAREDNESS AND PREVENTION** | | | |
| 34. | Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] | | Yes ☒ No ☐ N/A ☐ |
| 35. | Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: | | |
| | a. | Internal communications or alarm system? [3745-65-32(A)] | Yes ☒ No ☐ N/A ☐ |
| | b. | Emergency communication device? [3745-65-32(B)] | Yes ☒ No ☐ N/A ☐ |
| | c. | Portable fire control, spill control and decon equipment? [3745-65-32(C)] | Yes ☒ No ☐ N/A ☐ |
| | d. | Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] | Yes ☒ No ☐ N/A ☐ |
| *NOTE: Verify that the equipment is listed in the contingency plan.* | | | |
| 36. | Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] | | Yes ☒ No ☐ N/A ☐ |
| 37. | Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] | | Yes ☒ No ☐ N/A ☐ |
| 38. | Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] | | Yes ☒ No ☐ N/A ☐ |
| 39. | 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 ☒ No ☐ N/A ☐ |
| 40. | Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] | | Yes ☒ No ☐ N/A ☐ |
| 41. | Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] | | Yes ☒ No ☐ N/A ☐ |
| 42. | Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] | | Yes ☐ No ☐ N/A ☒ |
| **SATELLITE ACCUMULATION AREA REQUIREMENTS** | | | |
| 43. | Does the generator ensure that satellite accumulation area(s): | | |
| | a. | Are at or near a point of generation? [3745-52-34(C)(1)] | Yes ☒ No ☐ N/A ☐ |
| | b. | Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] | Yes ☒ No ☐ N/A ☐ |
| | c. | Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] | Yes ☒ No ☐ N/A ☐ |
| | d. | Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)] | Yes ☒ No ☐ N/A ☐ |

| | | | |
|---|---|---|---|
| | e. | Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] | Yes ☒ No ☐ N/A ☐ |
| | f. | Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] | Yes ☐ No ☒ N/A ☐ |
| 44. | Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: | | Yes ☐ No ☒ N/A ☐ |
| | a. | Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] | Yes ☐ No ☐ N/A ☒ |
| | b. | Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] | Yes ☐ No ☐ N/A ☒ |
| *NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less then 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.* | | | |
| **USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS** | | | |
| 45. | Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] | | Yes ☐ No ☐ N/A ☒ |
| 46. | Is the accumulation date on each container? [3745-52-34(A)(2)] | | Yes ☐ No ☐ N/A ☒ |
| 47. | Are hazardous wastes stored in containers which are: | | |
| | a. | Closed (except when adding/removing wastes)? [3745-66-73(A)] | Yes ☐ No ☐ N/A ☒ |
| | b. | In good condition? [3745-66-71] | Yes ☐ No ☐ N/A ☒ |
| | c. | Compatible with wastes stored in them? [3745-66-72] | Yes ☐ No ☐ N/A ☒ |
| | d. | Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] | Yes ☐ No ☐ N/A ☒ |
| *NOTE: Record location on process summary sheets, photograph the area, and record on facility map.* | | | |
| 48. | Is the container accumulation areas(s) inspected weekly? [3745-66-74] | | Yes ☐ No ☐ N/A ☒ |
| | a. | Are inspections recorded in a log or summary? [3745-66-74] | Yes ☐ No ☐ N/A ☒ |
| *NOTE: "Week" means 7 consecutive days per ORC§1.44(A).* | | | |
| 49. | Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] | | Yes ☐ No ☐ N/A ☒ |
| 50. | Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] | | Yes ☐ No ☐ N/A ☒ |
| 51. | If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] | | Yes ☐ No ☐ N/A ☒ |
| 52. | If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] | | Yes ☐ No ☐ N/A ☒ |
| *NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.* | | | |
| 53. | If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] | | Yes ☐ No ☐ N/A ☒ |

| | | |
|---|---|---|
| *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** | | |
| 54. | Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] | Yes ☒ No ☐ N/A ☐ |
| 55. | Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)] | Yes ☒ No ☐ N/A ☐ |
| 56. | Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] | Yes ☒ No ☐ N/A ☐ |