



**Environmental
Protection Agency**

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

February 27, 2012

**SCIOTO COUNTY
GENERAL FILE
(TEXAS EASTERN TRANSMISSION LP
WHEELERSBURG aka SPECTRA ENERGY)
DMWM/SEDO
OHD051368033**

Mr. Robert Bartels, Area Supervisor
Spectra Energy Transmission, LLC
3096 State Route 522
Wheelersburg, Ohio 45694

RE: NOTICE OF VIOLATION

Dear Mr. Bartels:

On February 22, 2012, Melody Stewart and I inspected Texas Eastern Transmission's Wheelersburg location to determine 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). This letter will explain the violations we found and what you need to do to correct the violations. The General Comments section of this letter will explain any other general concerns we have and what you can do to respond to those concerns.

We found the following violations of Ohio's hazardous waste laws. In order to correct these violations, you must do the following and send me the required information **within 14 days** of your receipt of this letter:

(1) OAC Rule 3745-65-51, Purpose and Implementation of Contingency Plan.

The owner/operator must have a contingency plan for the facility that is designed to minimize hazards to human health or the environment from fires, explosions, or any release of hazardous waste or hazardous waste constituents to air, soil or water. The contingency plan must be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

Texas Eastern's Wheelersburg facility maintains a book of written Standard Operating Procedures (SOPs) that contains Environmental SOPs related to Spill Prevention, Reporting, and Response. These SOPs are also available via computer at the facility. In addition, each building has a Spill Procedures Chart at the entrance/exit. The chart has basic contact and response information and

Refers to specific SOPs for more detailed information. The chart, and the Environmental SOPs referred to in the chart, did not contain the correct information regarding when the contingency plan must be implemented as specified in OAC Rule 3745-65-51(B). The chart and the SOPs instead incorrectly referred to a reportable quantity of a spill/release as the basis for implementing the contingency plan.

To demonstrate a return to compliance with this rule, Texas Eastern's Wheelersburg facility must revise the contingency plan, SOPs and Spill Procedures Chart. References to a reportable quantity of a spill/release as the basis for implementing the contingency plan must be removed. The contingency plan, SOPs and Spill Procedures Chart must instead state that the contingency plan must be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. To document abatement of this violation, please submit to me a copy of the revised contingency plan, SOPs and Spill Procedures Chart.

- (2) **OAC Rule 3745-65-52(A), Content of Contingency Plan-Notification Requirements.** The contingency plan must describe the actions the facility will take to comply with OAC Rules 3745-51 (Contingency Plan) and 3745-65-56 (Emergency Procedures) whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. OAC Rule 3745-56 requires notification of the Ohio EPA emergency response team by use of its 24-hour toll free number (1-800-282-9378).

The Spill Procedures Chart, and the Environmental SOPs referred to in the chart, did not list Ohio EPA's emergency response team among the required notifications in the event the contingency plan is implemented, as required.

To demonstrate a return to compliance with this rule, Texas Eastern's Wheelersburg facility must revise the contingency plan, SOPs and Spill Procedures Chart to include this information. To document abatement of this violation, please submit to me a copy of the revised contingency plan, SOPs and Spill Procedures Chart.

- (3) **OAC Rule 3745-65-52(E), Content of Contingency Plan – List of Emergency Equipment.** The contingency plan must include an up-to-date list of all emergency equipment at the facility (such as fire extinguishers, spill control and decontamination equipment, communications and alarm systems). The contingency plan must also include the location of each item on the list, and a brief description of its use/capabilities.

The Spill Procedures Chart, and the Environmental SOPs referred to in the chart, did not contain a list of emergency equipment, its location, and a brief description of its use/capabilities.

To demonstrate a return to compliance with this rule, Texas Eastern's Wheelersburg facility must revise the contingency plan, SOPs and Spill Procedures Chart to include this information. To document abatement of this violation, please submit to me a copy of the revised contingency plan, SOPs and Spill Procedures Chart.

(4) OAC Rule 3745-65-52(F), Content of Contingency Plan – Evacuation Plan.

The contingency plan must include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. The plan must describe the signal(s) to be used to begin evacuation, the evacuation routes, and the alternate evacuation routes to be used in cases where the primary routes could be blocked by releases or fires.

The Spill Procedures Chart, and the Environmental SOPs referred to in the chart, did not contain an evacuation plan for facility personnel with the information required by this rule.

To demonstrate a return to compliance with this rule, Texas Eastern's Wheelersburg facility must revise the contingency plan, SOPs and Spill Procedures Chart to include this information. To document abatement of this violation, please submit to me a copy of the revised contingency plan, SOPs and Spill Procedures Chart.

General Comments:

• **Spent Fluorescent Lamps/Universal Waste Requirements.**

I have enclosed Ohio EPA's fact sheets regarding management of spent fluorescent lamps as universal wastes.

Texas Eastern Transmission LP-Wheelersburg needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, Texas Eastern Transmission LP-Wheelersburg is requested to provide the requested documentation to this office of the steps taken to abate the violations cited above. The requested documentation may be submitted via regular postal service mail, or electronically to vicky.german@epa.ohio.gov.

Please be advised that violations cited above will continue until they have been properly abated. Failure to comply with Chapter 3734 of the Ohio Revised Code and the rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. Therefore, it is imperative that you return to compliance. If circumstances delay abatement of these violations, Texas Eastern Transmission LP-Wheelersburg 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 were completed as a result of the inspection. You can find copies of the hazardous waste rules and other information on our division's web page at <http://www.epa.ohio.gov/dhwm/lawsregs.aspx>. Pollution prevention and compliance assistance information can be found at <http://www.epa.ohio.gov/ocapp>. If you have any questions or need assistance, please contact me at 740-380-5237 or vicky.german@epa.ohio.gov.

Sincerely,



Vicky D. German
Division of Materials and Waste Management
Ohio EPA, Southeast District Office

VDG/sb
Enclosures

NOTICE:

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

 Environmental Protection Agency Send to Central Office <input checked="" type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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Completed forms that are required to be submitted to CO should be e-mailed to brad.hauser@epa.state.oh.us

Site EPA ID No.	EPA ID Number: OHD051368033
Site Name	Name: Texas Eastern Transmission LP-Wheelersburg Website (Optional): http://www.spectraenergy.com Street Address: 3096 State Route 522
Site Location Information	City, Town, or Village: Wheelersburg State: OH County Name: SCIOTO Zip Code: 45694
Site Land Type (check only one)	Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>
NAICS codes www.census.gov/epcd/www/naics.html	48621

Facility Representative	First Name: Robert MI: Last Name: Bartels
Additional names can be recorded in comments section. Only provide address information if it is different than the site address.	Phone Number: 740-574-2058 Extension:
	E-Mail Address: rcbartels@spectraenergy.com
	Fax Number: 740-574-4135 Fax Number Extension:
	Street or P.O. Box: 3096 State Route 522
	City, Town or Village: Wheelersburg State: OH Zip Code: 45694

Legal Owner And Operator	Name of Site's Legal Owner: Spectra Energy Corporation Date Became Owner (mm/dd/yyyy):
List additional Owners and/or Operators in the Comments Section or on another copy of this page.	Owner Type: Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>
	Street or P.O. Box: 5400 Westheimer Court
	City, Town or Village: Houston Owner Phone #: 713-989-8343
	State: TX Country: US Zip Code: 77056-5310
	Name of Site's Operator: Spectra Energy Corporation Date Became Operator:
	Owner Type: Private <input checked="" type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>
Street or P.O. Box: 5400 Westheimer Court	
City, Town or Village: Houston Operator Phone #: 713-989-8343	
State: TX Country: US Zip Code: 77056-5310	

VIOLATIONS CITED?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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TYPE OF HANDLER (MARK AS APPROPRIATE)	
<input type="checkbox"/> Not a Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11
<input type="checkbox"/> Short-Term Generator	<input checked="" type="checkbox"/> Large Quantity Generator (LQG)
Generated from short-term or one-time event and not from ongoing processes.	<input type="checkbox"/> Small Quantity Generator (SQG)
Check the box for the applicable generator status and provide a comment.	<input type="checkbox"/> Conditionally Exempt Small Quantity Generator (CESQG)
	<input type="checkbox"/> U.S. Importer of Hazardous Waste
	<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK AS APPROPRIATE)					
<input type="checkbox"/> Recycler of Hazardous Waste	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace				
<input type="checkbox"/> Underground Injection Control Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption				
<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption				
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste					
UNIVERSAL WASTE ACTIVITIES (MARK AS APPROPRIATE)					
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste				
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)					
TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES (MARK ALL THAT APPLY)					
<input type="checkbox"/> Batteries					
<input type="checkbox"/> Pesticides					
<input type="checkbox"/> Mercury containing equipment					
<input checked="" type="checkbox"/> Lamps					
USED OIL ACTIVITIES (MARK ALL THAT APPLY)					
<input checked="" type="checkbox"/> Used Oil Generator					
<input type="checkbox"/> Used Oil Transporter					
<input type="checkbox"/> Used Oil Transfer Facility					
<input type="checkbox"/> Used Oil Processor					
<input type="checkbox"/> Used Oil Re-refiner					
<input type="checkbox"/> Off-Specification Used Oil Burner					
<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil					
<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner					
Eligible Academic Entities with Laboratories: Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the boxes below to indicate the laboratory type.					
<input type="checkbox"/> College or University					
<input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university					
<input type="checkbox"/> Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university					
Waste Codes for Federally Regulated Hazardous Wastes: List the codes for the federally regulated hazardous waste handled at the site, in the order they are presented in the regulations (e.g., D001, D003, F007, U112). If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all; just indicate the date of the most recent source record.					
D001	D005	D007	D008	D009	D018
COMMENTS: Use this area to describe inspection conditions and additional information.					
Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:		
Tanks	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No			
Containers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No			
ADDITIONAL COMMENTS:					
Latitude/Longitude: 38.7008,-82.8306					
INSPECTOR(S)				INSPECTION DATE/TIME	
Vicky German, DMWM-SEDO		Melody Stewart, DMWM-SEDO		2/22/2012	

PROCESS INFORMATION AND WASTE ACTIVITIES SUMMARY

Texas Eastern Transmission LP - Wheelersburg

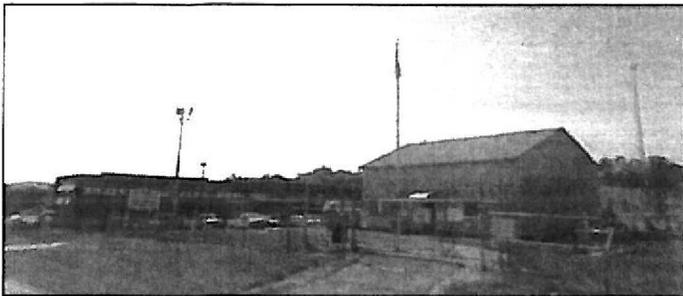
<i>Description of Waste</i>			<i>On-Site Management</i>		<i>Off-Site Management</i>
Waste Generated	EPA Waste Code	Amount Generated per Month	Accumulation and/or Storage	On-Site Treatment	Name and Activity
Pipeline liquids with less than 50 ppm PCBs	D001 D005 D007 D008 D009 D018	615 P	2360-G tank	NA	Veolia Environmental Solutions LLC , Port Arthur TX
Ignitable sludge with less than 50 ppm PCBs	D001 D005 D007 D008 D009 D018	181 P	55-G drum in drum storage area	NA	Veolia Environmental Solutions LLC , Port Arthur TX
Flammable waste oil	D001 D018 D039 D040	84 P	55-G drum in drum storage area	NA	Chemical Waste Management, Emelle AL
Maintenance pigs	D001	Varies	55-G drum in drum storage area	NA	Reused or sent to Chemical Waste Management, Emelle AL
Miscellaneous maintenance waste (PPE, coatings, soil, debris, sandblast media)	Non-hazardous	Varies	Roll-off box	NA	Chemical Waste Management, Emelle AL

PROCESS INFORMATION AND WASTE ACTIVITIES SUMMARY (cont.)

Texas Eastern Transmission LP - Wheelersburg

<i>Description of Waste</i>			<i>On-Site Management</i>		<i>Off-Site Management</i>
Waste Generated	EPA Waste Code	Amount Generated per Month	Accumulation and/or Storage	On-Site Treatment	Name and Activity
Used oil from equipment maintenance	Non-hazardous	Varies ~ 2 55-G drums/yr	55-G drum in drum storage area	NA	Safety-Kleen Recycled
Spent fluorescent lamps/ballasts	D009 unless recycled or managed as Universal Waste	Varies	Boxes inside facility	NA	Veolia Environmental Solutions LLC , Port Washington, WI Recycle Pak-Universal Waste
Spent painting and or solvent-related wastes	D001 D008 F003	Rarely generated	55-G drum in drum storage area	NA	Chemical Waste Management, Emelle AL
Waste paint chips, solids, debris	D008	Varies	Roll-off box	NA	Chemical Waste Management, Emelle AL

FACILITY AND PROCESS INFORMATION



Natural gas pipeline networks transport natural gas from processing plants in producing regions to areas with high natural gas requirements. With 9,200 miles of pipeline, Texas Eastern Transmission connects Texas and the Gulf Coast with high demand markets in the northeastern United States. Texas Eastern can transport 6.7 billion cubic feet per day, and offers 75.1 billion cubic feet of gas storage. Texas Eastern Transmission is owned and operated by Spectra Energy Transmission.

<http://www.spectraenergy.com/Natural-Gas-101/Distributing-Natural-Gas/>

Since the inner walls of gas distribution pipelines are not perfectly smooth, friction is produced when natural gas flows over it. Even a small amount of friction will lead to some pressure loss after the natural gas has passed through the pipeline for many miles. Compressor stations such as Texas Eastern Transmission's Wheelersburg station, are located at 40 to 100 mile intervals to re-pressurize the natural gas so it will remain pressurized as it continues to flow to the end user. Compressor stations also usually contain liquid separators, consisting of scrubbers and filters that filter the gas prior to compression, and capture any liquids, condensate, or other unwanted particles to ensure that the natural gas in the pipeline is as pure as possible. The main components of pipeline liquids are water and heavier hydrocarbons that condense-out of the natural gas as pressure drops along the pipeline. Pipeline liquids may also contain metal-based corrosion inhibitors and other liquids such as methanol that were added to the pipeline when cleaning ("pigging") the lines.

In the past, some large natural gas transmission pipeline companies used PCBs in turbine and air compressors as a fire-resistant hydraulic/lubricant and a plug valve sealant. PCB compressor lubricants could leak or blow by pressure seals and enter the transmission pipeline, mixing with the "pipeline liquids" already in the transmission lines. PCBs then entered other companies' pipelines via numerous interconnections. Some level of PCBs is still present in waste pipeline liquids; generally at levels less than 50 parts per million (ppm). U.S. EPA, under the Toxic Substances Control Act (TSCA), regulates the use, storage and disposal of PCBs with concentrations of 50 ppm or more.

WASTE INFORMATION

Texas Eastern's Wheelersburg compressor station has seven compressors. Gas is removed from the pipeline, compressed using centrifugal compressors, and returned to the pipe. Wastes are generated from pipeline maintenance. Liquids (pipeline fluids) are strained from the gas twice a week during maintenance activities and sent directly to an on-site tank for accumulation. A small amount of PCBs are present in the waste, but at levels of 49 ppm or less. Other maintenance wastes include liquids from the use of "pigs" for pipeline maintenance and non-hazardous solids such as coatings, soil and debris from spill clean up, and sandblast media. Used oil from maintenance of on-site equipment such as lawnmowers, etc. and spent fluorescent lamps (managed as universal waste) are also generated.

REGULATORY HISTORY

The facility was last inspected for compliance with Ohio's hazardous waste regulations on 10/23/2007 and abated violations discovered during this inspection on 12/3/2007.

LARGE QUANTITY GENERATOR REQUIREMENTS

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

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

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

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
2.	Are records of waste determination being kept for at least 3 years?[3745-52-40(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
4.	Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
6.	Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
7.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
8.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<i>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.</i>				
9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
<i>NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G) & (H).</i>				
10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]			
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
<i>NOTE: Complete appropriate checklist for each unit. If waste is treated to meet LDRs, use LDR checklist.</i>				
11.	Does the generator export hazardous waste? If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

MANIFEST REQUIREMENTS

12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<i>NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]</i>				

14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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 of the 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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
18.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
19.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
25.	Does the generator provide annual refresher training to employees? [3745-65-16(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
26.	Does the generator keep records and documentation of:			
	a. Job titles? [3745-65-16D(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b. Job descriptions? [3745-65-16D(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c. Type and amount of training given to each person? [3745-65-16D(3)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d. Completed training or job experience required? [3745-65-16D(4)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
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Texas Eastern's Wheelersburg facility maintains a book of written Standard Operating Procedures (SOPs) that contains Environmental SOPs related to Spill Prevention, Reporting, and Response. These SOPs are also available via computer at the facility. Each building has a Spill Procedures Chart at the entrance/exit. The chart has basic contact and response information and refers to specific SOPs for more detailed information. The chart and the SOPs referred to in the chart did not contain correct information specifying when the contingency plan must be implemented in accordance with OAC Rule 3745-65-51(B). The chart and the SOPs instead incorrectly referred to a reportable quantity of a spill/release as the basis for implementing the contingency plan.

29.	Does the contingency plan describe the following:			
a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

The Spill Procedures Chart, and the Environmental SOPs referred to in the chart, did not state that when there is an emergency situation in which the contingency plan is implemented the facility must notify Ohio EPA by using the 24-hour toll free number, 1-800-282-9378.

b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

The Spill Procedures Chart, and the Environmental SOPs referred to in the chart, did not contain a list of emergency equipment and its location, or an evacuation plan for facility personnel as required by OAC Rule 3745-65-52(E) and (F).

NOTE: If the facility already has a "Spill Prevention, Control and Counter measures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

EMERGENCY PROCEDURES

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

NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health and the environment.

PREPAREDNESS AND PREVENTION

34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:			
a.	Internal communications or alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: Verify that the equipment is listed in the contingency plan.				
36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
39.	If there is only one employee on the premises, is there immediate access to a device (ex.phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

SATELLITE ACCUMULATION AREA REQUIREMENTS

43.	Does the generator ensure that satellite accumulation area(s):			
a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
f.	Containers are marked with the words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	Did the generator comply with 3745-52-34(A)(1)through(4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded?[3745-52-34(C)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

45.	Has the generator marked each container with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
46.	Is the accumulation date on each container? [3745-52-34(A)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
Texas Eastern's Wheelersburg facility accumulates waste in an outdoor waste storage area that consists of concrete bermed floor covered by a metal roof. At the time of the inspection there were no hazardous wastes being accumulated in the waste storage shed.				
47.	Are hazardous wastes stored in containers which are:			
	a. Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b. In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c. Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
48.	Are hazardous waste container accumulation areas inspected weekly? [3745-66-74] <i>Note: "Week" means 7 consecutive days, per ORC§1.44(A).</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a. Are inspections recorded in a log or summary? [3745-66-74]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.				
53.	If the generator has closed a <90 day accumulation area, does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: Please provide a description of 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
55.	Does each container less than 110 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

LAND DISPOSAL RESTRICTIONS (LDR) - GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

1.	If LDRs do not apply, does the generator have a statement that lists how the hazardous waste was generated, why LDRs don't apply, and where the hazardous waste went? [3745-270-07(A)(7)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
2.	Did the generator determine if the hazardous waste/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not,	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
a.	Did the generator send the waste to a permitted hazardous waste treatment facility ? [3745-270-07(A)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
<p>NOTE: This is done by determining if the hazardous waste/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 hazardous waste, 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).</p>				
3.	Does the generator have documentation of how he determined whether the hazardous waste/soil meets or does not meet the LDR treatment standard in #2 above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
4.	Does the generator keep the documentation required in #2 above, on-site for at least three years from the last date the hazardous waste/soil was sent for treatment/disposal? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
5.	Does the generator generate a listed hazardous waste that exhibits a characteristic? If yes,	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
a.	Did the generator determine if the listed hazardous waste exhibits a characteristic that is not treated under the LDR treatment standard for the listed hazardous waste? [3745-270-09(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
<p>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 hazardous waste is treated for.</p>				
6.	Did the generator determine if its characteristic hazardous waste contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
<p>NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the hazardous waste 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 hazardous wastes.</p> <p>NOTE: Written documentation of this determination is not required.</p>				
7.	Did the generator treat their hazardous waste/soil on-site to meet the LDR treatment standard?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
<p>NOTE: If "Yes" see question #16.</p>				
8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
a.	If the generator chose not to make the determination of whether their waste must be treated, did they send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
i.	Applicable hazardous waste codes?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
ii.	Manifest number of the first shipment to the TSD?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

	iii	A statement that conveys that the hazardous waste may or may not be subject to the LDR treatment standards and the TSD must make that determination."?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
9.		Did the generator resubmit the LDR notification form to the TSD when the hazardous waste changed or the generator used a new TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
10.		Does the generator have a copy of the LDR notification form/notice on file? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	a.	Is the form/notice kept on file for three years after last hazardous waste shipped? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

NOTIFICATION FORM

11.	Does the LDR Notification form contain the following information:				
	a.	Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	b.	Applicable waste codes (includes characteristic codes for a listed hazardous waste if applicable)? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	c.	A statement that conveys that the hazardous waste is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	d.	A designation whether the hazardous waste is a wastewater or non-wastewater? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the hazardous waste is a wastewater or non-wastewater, the hazardous waste can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.					
	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all hazardous wastes have subcategories					
	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.					
	g.	If the hazardous waste is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.					

PROHIBITED DILUTION

12.	Is the hazardous waste treated by burning? If "No" go to #15.				
			Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
13.	Is the hazardous waste a metal-bearing hazardous waste?				
			Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
NOTE: Generally, metal-bearing hazardous wastes contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing hazardous wastes are given in the Appendix to 3745-270-03.					

14.	a.	Metal-bearing hazardous wastes cannot be incinerated, combusted or, blended and burned for fuel unless one of the following conditions apply: [3745-270-03(c)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	i.	Contains > 1% TOC?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	ii.	Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	v.	Co-generated with a hazardous waste that must be combusted?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	b.	If all responses to 14 a.i. through 14 a.v. are "No", hazardous waste is being improperly treated by dilution, violation of 3745-270-03(C). Is hazardous waste being treated by dilution?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
15.		Was the hazardous waste treated by wastewater treatment?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
NOTE: If "Yes", hazardous waste is improperly being treated by dilution.					
	b.	Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].					
NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.					
GENERATOR TREATMENT					
16.		Does the generator treat to meet LDRs on-site?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	NA <input type="checkbox"/>
		Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input checked="" type="checkbox"/>
 If "NO", stop here.					
	a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the hazardous waste/soil to the LDR treatment standard? [3745-270-07(A)(5)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	b.	Did the generator use a detailed chemical and physical analysis of the hazardous waste/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
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 hazardous waste/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	d.	Does the WAP include the testing frequency of the treated hazardous waste/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

	e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
NOTIFICATION FORM FOR GENERATOR TREATMENT					
17.	a.	Does the LDR notification form contain all information in #11 a-g above, and	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	b.	If the treated hazardous waste/soil is listed, does the notification contain the following certification statement? <i>"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."</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	c.	If the treated hazardous waste/soil no longer exhibits a characteristic and is no longer a hazardous waste, did the generator:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	i.	Prepare a one-time notification? [3745-270-09 (D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	ii.	Maintain a copy of the notice onsite? [3745-270-09(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	iii.	Include in the notification: [3745-270-09(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
		1. Name & address of receiving landfill?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
		2. Description of hazardous waste when generated?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
		3. Hazardous waste code when generated?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
		4. Treatability group when generated?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
		5. Underlying hazardous constituents present when generated?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
	iv.	Contain the certification statement as required by 3745-270-07(B)(4)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

TANK SYSTEM REQUIREMENTS

LABELING

1. Is each tank clearly labeled with the words "Hazardous Waste" ? [3745-52-34(A)(3)] Yes No NA

OPERATING REQUIREMENTS

2. Does the o/o follow the general operating requirements below:
- a. Prevent placement of hazardous waste or treatment reagents in tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail? [3745-66-94(A)] Yes No NA
- b. Use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)? [3745-66-94(B)] Yes No NA
- c. If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96? [3745-66-94(C)] Yes No NA

INSPECTIONS

3. Are inspections required in 3745-66-95 documented in the operating record, including inspection of the following:
- a. Spill control equipment each operating day? [3745-66-95(A)(1)] Yes No NA
- b. Above ground portion of tank each operating day? [3745-66-95(A)(2)] Yes No NA
- c. Data from leak detection equipment each operating day? [3745-66-95(A)(3)] Yes No NA
- d. Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste each operating day? [3745-66-95(A)(4)] Yes No NA

NOTE: "Each operating day" is each day that the tank system is being used to manage (store or treat) hazardous waste.

4. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter?[3745-66-95(B)(1)] Yes No NA
5. Where applicable, all sources of impressed current at least bi-monthly?[3745-66-95(B)(2)] Yes No NA

CLOSURE REQUIREMENTS

6. If the generator has closed a <90 day tank, was closure completed in accordance with OAC 3745-66-97 (except for paragraph C)? Yes No NA

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES

7. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with **one of the following**: [3745-66-98(A)]
- a. Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-66-17(B)? [3745-66-98(A)]; **OR** Yes No NA
- b. Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A)]; **OR** Yes No NA
- c. The tank is used solely for emergencies? [3745-66-98(A)] Yes No NA

8. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (1996)? [3745-66-98(B)] Yes No NA
9. Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material? [3745-66-99(A) and/or (B)] Yes No NA
- a. **If so**, have the requirements of 3745-65-17(B) been met? [3745-66-99(A) and/or (B)] Yes No NA

WASTE ANALYSIS REQUIREMENTS

10. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-100]
- a. Conducted waste analysis and trial treatment or storage tests? [3745-66-100(A)]; **OR** Yes No NA
- b. Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-100(B)] Yes No NA

TANK SYSTEM DESIGN AND ASSESSMENT REQUIREMENTS

11. Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-66-92(A)] Yes No NA
12. Does the written assessment include the following: [3745-66-92(A)]
- a. Certification by an independent registered, professional engineer? [3745-66-92(A)] Yes No NA
- b. Consideration of the design standards of the system? [3745-66-92(A)] Yes No NA
- c. Consideration of the hazardous characteristics of the waste(s)? [3745-66-92(A)] Yes No NA
- d. An evaluation by a corrosion expert (only if the external system/components are metal and in contact with soil or water)? [3745-66-92(A)] Yes No NA
- e. A determination of design and operational measures that will be needed to protect the tank system from potential damage (only for underground tank components)? [3745-66-92(A)] Yes No NA
- f. Design considerations to ensure that the tank foundations will maintain the load of a full tank? [3745-66-92(A)] Yes No NA
- g. Design considerations for anchoring the unit to prevent floatation (only for tanks situated in a seismic fault zone or saturated zone)? [3745-66-92(A)] Yes No NA
- h. Design considerations to ensure that the tank system will withstand the effects of frost heave (only for underground tank systems)? [3745-66-92(A)] Yes No NA
13. Are there written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)] Yes No NA
- Do the written statements address all of the following:
- a. Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)] Yes No NA
- b. Statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)] Yes No NA

- | | |
|---|---|
| c. Proper backfilling? [3745-66-92(C)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> |
| d. Tightness test; if the tank system was found not to be tight, does the statement indicate that proper repairs were made? [3745-66-92(D)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> |
| e. Proper support and protection of ancillary equipment? [3745-66-92(E)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> |
| f. Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)] | Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> |

SECONDARY CONTAINMENT

14. Has secondary containment been provided? Yes No NA

NOTE: All tank systems must have secondary containment at this point, except for tank systems that store/treat materials that become hazardous waste after January 12, 1987, must have secondary containment required within the time intervals in [3745-66-92(A)(1)] to (A)(4). The date the material became a hazardous waste must be used in place of January 12, 1987. [3745-66-92(A)(5)]

15. Is secondary containment one of the following:

- | | |
|--|---|
| a. External Liner? [3745-66-93(E)(1)] If so, | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> |
| i. Is liner designed or operated to contain 100% of the capacity of the largest tank? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> |
| ii. Is liner designed and operated to prevent run-on and infiltration <u>or</u> the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> |
| iii. Is liner free of cracks and gaps? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> |
| iv. Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> |
| v. Are chemically resistant water stops in place at all points? (<i>concrete liners only</i>) | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> |
| vi. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? (<i>concrete liners only</i>) | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> |
| b. Vault System? [3745-66-93(E)(2)] If so, | Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> |
| i. Is vault system designed to contain 100% of the capacity in the largest tank? | Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> |
| ii. Is liner designed and operated to prevent run-on and infiltration <u>or</u> the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm? | Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> |
| iii. Are chemically resistant water stops in place at all points? | Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> |
| iv. Is there a compatible interior coating to prevent migration into the concrete? | Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> |
| v. For ignitable or reactive waste : Is the vault system provided with means to prevent (or alternatively "protect against") the formation or ignition of vapors? | Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> |
| vi. Is vault system provided with an exterior moisture barrier? | Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> |
| c. Double-Walled Tank? [3745-66-93(E)(3)] If so, | Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> |
| i. Is double-walled tank designed as an integral structure to contain any release from the inner tank? | Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> |
| ii. If metal , are the primary tank interior and outer shell exterior surfaces protected from corrosion? | Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> |

iii. Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time?	Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/>
d. An Equivalent Device? As described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D&E)]	Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/>

SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION

16. Has each secondary containment system been designed, installed and operated to prevent <u>any</u> migration of wastes or liquid to the soil, groundwater, or surface water and is it capable of <u>detecting</u> and <u>collecting</u> releases and accumulated liquids? [3745-66-93(B)(1) and (2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
17. Does the secondary containment system meet the following minimum requirements of [3745-66-93(C)]:	
a. Constructed or lined with compatible materials of sufficient strength to prevent failure? [3745-66-93(C)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
b. Placed on a foundation or base capable of providing support?[3745-66-93(C)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
c. Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time? [3745-66-93(C)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
Yes d. Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? [3745-66-93(C)(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
e. Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner? [3745-66-93(C)(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>

ANCILLARY EQUIPMENT REQUIREMENTS

18. Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
If not , is the ancillary equipment one of the following: [3745-66-93(F)]	
a. Above ground piping (exclusive of flanges, joints, valves and connections) that is inspected daily?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
b. Welded flanges, welded joints and/or welded connections that is inspected daily?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
c. Sealless or magnetic coupling pumps and/or sealless valves?	Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/>
d. Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown and/or loss of pressure-actuated shut-off devices) that is inspected daily?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>

TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE

19. Has there been a leak or spill from any tank system or has any tank system been found unfit for use? If so , did the o/o:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/>
NOTE: If the tank is found to be unfit for use, inspector should explain why.	
a. Immediately cease flow of material into tank and investigate the cause of the release? [3745-66-96(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/>
b. Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time? [3745-66-96(B)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/>
c. Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment? [3745-66-96(B)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/>

- d. For a visible release to the environment, immediately conduct a visual inspection of the release?[3745-66-96(C)] Yes No NA
- e. For a visible release to the environment, prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C)] Yes No NA
- f. For a visible release to the environment, properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)] Yes No NA
- g. Report any release to the environment to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)] Yes No NA
- h. For a release to the environment, submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)] Yes No NA
- i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)(2)] Yes No NA
- j. For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)] Yes No NA

NOTE: The requirements noted in 20.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.

20. In the event that the repairs to the tank system were major (e.g., replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from an independent, registered P.E. attesting that the repaired unit is capable of handling hazardous waste? [3745-66-96(F)] Yes No NA
21. Was a copy of the certification submitted to the director within seven days after returning the system to use? [3745-66-96(F)] Yes No NA
22. If the o/o was unable to repair and return the unit to service as described in 20.a through 20.e, was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)] Yes No NA
23. Does the o/o have a tank system **with a variance from secondary containment** from which a release has occurred but has not migrated beyond the zone of engineering control? **If so,** Yes No NA
- a. Has the o/o complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G)(3)] Yes No NA
- b. If soils cannot be decontaminated/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)] Yes No NA
24. Does the o/o have a tank system **with a variance from secondary containment** from which a release occurred and has migrated from the zone of engineering control? **If so,** Yes No NA
- a. Has the o/o complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)] Yes No NA
- b. If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(4)] Yes No NA

USED OIL GENERATOR COLLECTION CENTER, AND AGGREGATION POINT REQUIREMENTS

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

PROHIBITIONS

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

GENERATOR STANDARDS

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

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

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

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

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

ON-SITE BURNING IN SPACE HEATERS

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] Yes No N/A
If so:
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes No N/A
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A

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

GENERATOR TRANSPORTATION

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

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

COLLECTION CENTERS AND AGGREGATION POINTS

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

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

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - LAMPS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more
Small Quantity Universal Waste Handler (SQUWH) = Less than 5,000 Kg (11,023 lb)

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes No NA
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-11(B)? [3745-273-11(B)] Yes No NA

LABELING

8. Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] Yes No NA
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 NA
10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste – Lamps" or "Waste Lamps" or "Used Lamps"? [3745-273-14(E)] Yes No NA
At the time of the inspection, there were no boxes of spent lamps awaiting recycling. The facility had Recycle-Pak boxes ready for accumulation of lamps when needed.

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

ACCUMULATION TIME

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

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes No NA
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes No NA
12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)]
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes No NA
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes No NA
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes No NA
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes No NA
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes No NA
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes No NA

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 NA

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes No NA
15. Is the material released characterized? [3745-273-17(B)] Yes No NA
16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] Yes No NA

OFF-SITE SHIPMENTS

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

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes No NA

NOTE: SQUWHs are prohibited to send waste to any other facility.

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] Yes No NA
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No NA
20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:
- a. Receive the waste back? [3745-273-18(E)(1)] Yes No NA
 - b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes No NA
21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes No NA
 - b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes No NA
22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] Yes No NA
23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] Yes No NA

EXPORTS

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