



State of Ohio Environmental Protection Agency

Southeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Laura H. Powell, Acting Director

January 16, 2007

**ATHENS COUNTY
GENERAL FILE
(TENNESSEE GAS PIPELINE)
DHWM/SEDO
OHD079432522**

Mr. Scott J. Lewis
Tennessee Gas Pipeline Company
1211 Greenville Mercer Road
Mercer, PA 16137

Dear Mr. Lewis:

On December 19, 2006 and December 29, 2006, I inspected Tennessee Gas Pipeline's Station 204 in Albany, Ohio to determine Tennessee Gas Pipeline's 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 identified during the inspection, what you need to do to correct the violations, other general comments, and what you need to do to respond to the comments.

The following violations of Ohio's hazardous waste laws were found. In order to correct these violations, you must do the following and send me the required information **within 30 days** of your receipt of this letter:

Violations

- (1) **OAC Rule 3745-279-22(C)(1), Used Oil Storage Requirements:** Containers and above ground tanks used to store used oil at generator facilities shall be labeled or marked clearly with the words, "Used Oil." At the time of the December 19, 2006 inspection, the 55-gallon drum being used in the Pipeline Shop to collect used oil from the oil filter crusher was not labeled with the words, "Used Oil" as required.

When I returned to the facility on December 29, 2006, the used oil container had been properly labeled with the words "Used Oil," abating this violation. Tennessee Gas Pipeline is returned to compliance with this rule, no further action is necessary.

- (2) **OAC Rule 3745-273-13(D)(1), Waste Management - Standards for Small Quantity Handlers of Universal Waste:** A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

At the time of the December 19, 2006 inspection, Tennessee Gas Pipeline was storing their 4- and 8-foot spent fluorescent lamps standing upright a plastic trash barrel. A plastic trash barrel does not provide adequate protection to prevent breakage of the bulb since the bulbs extend above the top of the barrel and there is no lid on the barrel.

When I returned to the facility on December 29, 2006, the 4-foot bulbs were being stored in a closed paperboard drum. You reported that a larger container for the 8-foot bulbs had been ordered but not yet received.

In order to demonstrate your compliance with this rule, send a photograph of the room where the spent lamps are stored which shows the upgraded storage containers.

- (3) **OAC Rule 3745-273-14(E), Labeling/Marking - Standards for Small Quantity Handlers of Universal Waste:** A small quantity handler of universal waste must label or mark the universal waste to identify the type of universal waste as specified in this rule. Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste- Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)."

During the December 19, 2006 inspection, it was observed that neither the lamps, nor containers were labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)", as required by this rule.

When I returned to the facility on December 29, 2006, all the universal waste containers had been labeled. Please submit a photograph of the new container for the 8-foot lamps showing that this container has been properly labeled.

- (4) **OAC Rule 3745-273-15(C), Accumulation Time Limits- Standards for Small Quantity Handlers of Universal Waste:** A small quantity handler of universal waste who accumulates universal waste shall be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

At the time of the December 19, 2006 inspection, Tennessee Gas Pipeline did not have a method of documenting the length of time that universal waste is stored. On December 29, 2006, I observed that the containers holding universal waste had been dated with the date that they began storing the bulbs as a universal waste. Tennessee Gas Pipeline is returned to compliance with this rule, no further action is necessary.

General Comments

- (a) On December 19, 2006, I observed a 20-yard roll-off box of waste sandblast material. This roll-off box was being stored in the grassy area which is southeast of the compressor building and north of the condensate and used oil and storage tanks. Next to the roll-off box were two piles of additional waste sandblast material. These piles had been placed on tarps. The piles were not covered.

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When I returned to the facility on December 29, 2006, the piles were gone and the ground surface where the piles had been stored had been scraped with a backhoe. You reported that the roll-off box I observed on December 19, 2006, had been removed for disposal. You stated that the roll-off box in place that day (December 29, 2006) now contained the two piles I had observed and the soil from where the ground was scraped.

You have stated that this sandblast material is hazardous for lead. Storage of a hazardous material on the ground is unacceptable. As you know, illegal hazardous waste storage is a serious matter. If it is determined that a release occurred in such a situation, the responsible party could be subject to hazardous waste closure requirements; cited as an illegal treatment, storage and disposal facility; and subject to an enforcement action and possible penalty.

Facility personnel stated that additional sandblasting and painting is planned for 2007. **Within 30 days** of your receipt of this letter, please provide a written response to this letter which states what procedures Tennessee Gas Pipeline will put into place to ensure proper management of sandblast material generated in the future.

- (b) During the December 19, 2006, inspection there were two 5-gallon pails labeled as "No. 71 Wikopon Epoxy Thinner" located in the shop building. A Tennessee Gas Pipeline employee indicated that they were planning to remove the lids from the containers and allow the unwanted product to evaporate. If Tennessee Gas Pipeline does decide to dispose of this material, it must first be evaluated to determine if it is a hazardous waste.

I have reviewed a Material Safety Data Sheet for this product and noted that it has a flash point of 60 F which would make it an ignitable hazardous waste (D001) if disposed. The product also contains methyl isobutyl ketone, n-butyl alcohol, and ethylbenzene which are all constituents of F003 listed hazardous waste.

Hazardous waste generators may not treat their hazardous waste onsite, if it would allow a release of hazardous waste or hazardous waste constituents to the air or to the environment. If this material was stored without lids so that it could evaporate, Ohio EPA would consider it illegal disposal. Generators may not dispose of their hazardous waste onsite without a permit. Evaporating a hazardous waste would make the generator an illegal treatment, storage and disposal facility. This is a serious matter that could subject the generator to an enforcement action and possible penalty.

Within 30 days of your receipt of this letter, please provide a written response to this letter that states whether Tennessee Gas Pipeline will be disposing of this material and if so, how they intend to manage its disposal.

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Enclosed you will find a copy of the checklists that were completed during the inspection. Should you have any questions, please feel free to call me at (740) 380-5248. You can find copies of the rules and other information on the division's web page at <http://www.epa.state.oh.us/dhwm/>. Information about pollution prevention is also available at <http://www.epa.state.oh.us/ocapp/ocapp.html>.

Sincerely,



Elizabeth A. Herron
Environmental Specialist
Division of Hazardous Waste Management

EAH/mlm

Enclosures

cc: Mark C. Ervin, Tennessee Gas Pipeline

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.

e-mail this completed form to tammy.mcconnell@pa.state.oh.us or mail it to Tammy McConnell, Central Office	Ohio Environmental Protection Agency RCRA SITE IDENTIFICATION/VERIFICATION FORM		For Ohio EPA use only																	
2. Site EPA ID No.	EPA ID Number: OHD079432522																			
3. Site Name	Name: Tennessee Gas Pipeline - Station 204		Website (optional):																	
4. Site Location Information	Street Address: 2335 US 50 West																			
	City, Town, or Village: Albany	State: OH																		
	County Name: Athens	Zip Code: 45710																		
5. Site Land Type (check only one)	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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6. NAICS code(s) www.census.gov/epcd/www/naics.html	A.		B.																	
7. Facility Representative: Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	First Name: Scott		MI: J																	
	Last Name: Lewis		Phone Number Extension:																	
	Phone Number: 724 662-6436		E-Mail Address: scott.lewis@elpaso.com																	
	E-Mail Address: scott.lewis@elpaso.com		Fax Number Extension:																	
	Fax Number: 724 662-6484		Street or P.O. Box: 1211 Greenville Mercer Road																	
	Street or P.O. Box: 1211 Greenville Mercer Road		City, Town or Village: Mercer																	
	City, Town or Village: Mercer		State: PA																	
	State: PA		Country: USA																	
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	A. Name of Site's Legal Owner: Elpaso Pipeline Group		Date Became Owner (mm/dd/yyyy):																	
	Owner Type: Mark with an X	<table border="1" style="width: 100%; text-align: center;"> <tr> <td>Private</td> <td>County</td> <td>District</td> <td>Federal</td> <td>Indian</td> <td>Municipal</td> <td>State</td> <td>Other</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>			Private	County	District	Federal	Indian	Municipal	State	Other	<input checked="" type="checkbox"/>	<input type="checkbox"/>						
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	City, Town, or Village:		Owner Phone #:																	
	State:		Country:																	
	Country:		Zip Code:																	
	Zip Code:		B. Name of Site's Operator:																	
	Date Became Operator (mm/dd/yyyy):		Operator Type: Mark with an X																	
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City, Town, or Village:		Operator Phone #:																		
State:		Country:																		
Country:		Zip Code:																		
Zip Code:																				
9. Violations Cited?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No																		
10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)																				
<input type="checkbox"/> Not Regulated																				

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Tennessee Gas Pipeline

Facility Type: LQG

EPA ID#: OHD079432522

Description of Waste

On-Site Management

Off-Site Management

**Process/Activity
Generating Waste**

(e.g. plating bath,
machining, baghouse,
painting, etc)

**Waste
Generated**

(e.g. sludge,
spent solvent,
ash, etc)

**EPA
Waste
Code**

**QTY
Generated**

**Type of
Accumulation/
Storage**

(e.g. container,
tank, etc)

**Type of On-
Site Treatment**

(recycle, wwt, etc)

Waste Location

(see attached map)

**Name, state, and type of
activity occurring at the
facility.**

1	Sandblasting old paint off of gas transmission lines	Spent sandblast media	D008	In 2006, four 20 yd. Roll-off boxes were generated by the re-painting of the transmission lines at the facility	20 yd. Roll-off boxes	Not applicable	The roll-off boxes were stored in the grassy area southeast of the compressor building, north of the condensate and used oil and storage tanks	Clean Harbors Spring Grove, OH
2	Collection of condensate from 3 pipe drip stations	Pipeline condensate	off-specification fuel, not a hazardous waste	3,000 gallons total generated twice per year	3,000 gallon tank	Not applicable	located Southeast of the compressor building, next to the used oil tank	Norlite Corporation Cohoes, New York Burned for energy recovery
3	Compressor engines in the compressor station and crushing of oil filters	Used oil	On-spec.	1,300 gallons total in 2005, oil is changed when indicated by the filter differential pressure	3,000 gallon tank and 55-gallon drums	Not applicable	Tank is located Southeast of the compressor building, next to the pipeline condensate tank Drums are used in the Pipeline Shop to collect used oil from the filter crusher	Safety-Kleen Groveport, OH marketing
4	Cleanout of gas transmission pipes	Pipe sludge	D018	50- 100 pounds per year	55-gallon drums	Not applicable	Drum storage building, which is located west of the other site buildings and near the lake	Clean Harbors Spring Grove, OH Burned for energy recovery

5	Lighting	Fluorescent lamps, 4 and 8 foot	Universal waste	varies	Cardboard containers	Not applicable	Shop building loft	Clean Harbors Spring Grove, OH recycled
6	Backup batteries	batteries	Exempt OAC Rule 3745-266-80	100-150 pounds per year	pallet	Not applicable	Drum storage building*	Clean Harbors Spring Grove, OH recycled
7	Parts washers	Spent solvent	D001	No generation in the last 3 years	Not applicable	Not applicable	One parts washer in the Shop Building and one in the Pipeline Shop	Safety-Kleen Groveport, OH
8	Miscellaneous Painting of equipment	Paint waste	Waste codes vary, disposed of as a lab pack	Facility was in the process of doing a clean out of their paint storage area at the time of the inspection, two 55-gallon drums had been generated	55-gallon drums	Not applicable	Drum storage building	Not yet manifested. Facility plans have Clean Harbors collect the waste.

* On the initial December 19, 2006 inspection, the batteries were being stored in the outdoor covered storage area of the construction building. At the December 29, 2006, follow-up visit the batteries had been moved to the drum storage building which is where Tennessee Gas plans to store them from now on.

REMARKS-GENERAL INFORMATION

General Process Information

Tennessee Gas Pipeline has an underground natural gas transmission line from the Gulf of Mexico to the Northeastern United States. This transmission line is actually 4 pipelines which run parallel to one another. In order to move the gas through the lines it has to be pressurized. The pressurization is done at compressor stations, which are spaced approximately every 75 miles along the line. The Tennessee Gas Pipeline Station 204 in Albany, Ohio is one such station. The facility has a set of 12 compressors housed in the compressor building. If the gas in the line still has enough pressure to continue moving when it reaches the compressor station then it passes through without being re-pressurized. Tennessee Gas Pipeline Station 204 has not been needed since August 2006, so the compressors have not been run since then.

The lines between stations are cleaned using "pigs" which are sent through the line to remove accumulated pipe sludge. The pigs can also be fitted with electronics that are used to monitor the pipeline integrity. The pipe sludge is a hazardous waste for benzene.

The section of pipeline that is maintained by Station 204 has three drip gas collection points. The pipeline condensate is collected using a portable tank that can be truck mounted. The condensate is then stored in a 3,000 gallon tank located at the station. The condensate has a high Btu value and transported to Norlite Corporation where it is burned for energy recovery. The condensate is classified as an off-specification fuel and therefore is ^{not} regulated as a hazardous waste when it is burned for energy recovery. During 2006 no pipeline condensate was generated since the compressor station has not been used since August 2006.

During 2006 Tennessee Gas Pipeline Station 204 was repainting the portion of transmission line that is above ground at the facility. Before the painting was done the piping was sandblasted to remove the old paint. The waste sandblast material is reportedly hazardous for lead. Four 20 yard roll-off boxes of waste were reportedly generated. On December 19, 2006, when the first inspection visit was made to the facility, one 20 yard roll-off box containing sandblast material was being stored on-site. Next to the roll-off box were piles of sandblast material. A tarp was under the piles but they were not covered. At the December 29, 2006 follow up visit the first roll-off box had been removed for disposal and the two piles of sandblast material had been placed in a second roll-off box. The ground surface where the piles had been stored had been scraped with a backhoe and the soil was put into the roll-off box.

Regulatory/Enforcement History

Tennessee Gas Pipeline Station 204 has not been previously inspected for hazardous waste.

LARG. QUANTITY GENERATOR REQUIREMENTS

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

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

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

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

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A RMK#
2. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes No N/A RMK#
3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41] Yes No N/A RMK# 1

WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? If so: Yes No N/A RMK#
 - a. Has the generator notified U.S. EPA of export/import activity? [3745-52-53] Yes No N/A RMK#
 - b. Has the generator complied with special manifest requirements? [3745-52-54] Yes No N/A RMK#
 - c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] Yes No N/A RMK#
 - d. Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes No N/A RMK#
 - e. Are export related documents being maintained on-site? [3745-52-57] Yes No N/A RMK#

GENERATOR CLOSURE REQUIREMENTS

5. Has the generator closed any <90-day accumulation unit(s) since the date of the last inspection? If so: Yes No N/A RMK#

a. Describe the unit(s) which the generator has closed.

b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]

Yes ___ No N/A RMK# ___

c. Please provide a description of the documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standards.

NOTE: *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]*

REMARKS

1.) Facility was not a large quantity generator in 2005. An annual report will be required March 2007 for waste generated in 2006.

MANIFEST REQUIREMENT:

You must start this part of the inspection by telling the company representative about the certification statement on the hazardous waste manifest using the following question and statement:

Are you aware of what the statement that you sign on the manifest says? Yes No

If the answer is no, show them what the statement says using a signed manifest.

NOTE: *While the statement is a certification that a P2 strategy is in place, signing the statement does not establish any legal obligations with which the company must comply. In other words, there is no violation of the hazardous waste rules if they sign the manifest and they don't have a program in place.*

1. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes No N/A RMK#

2. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] Yes No N/A RMK#

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)]*

3. Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)] Yes No N/A RMK#

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)].*

4. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: Yes No N/A RMK#

a. 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 RMK#

5. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)] Yes No N/A RMK#

6. Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not: Yes No N/A RMK#

- a. 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 RMK#
- b. If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes No N/A RMK#
7. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes No N/A RMK#

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.*

REMARKS

PERSONNEL TRAINING

- 1. Does the generator keep records required by 3745-65-16(D) including:
 - a. Job titles, as they relate to hazardous waste management, and the name of each employee filling each job? Yes No N/A ___RMK#___
 - b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position? Yes No N/A ___RMK#___
 - c. Type and amount of both introductory and continuing training to be given to each person filling a position? Yes No N/A ___RMK#___
 - d. Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)? Yes No N/A ___RMK#___

NOTE: If the facility's business practices precludes written job titles/descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be used to document that all necessary employees have been trained.

- 2. 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 ___RMK#_2___
- 3. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]
 - a. Emergency procedures? Yes No N/A ___RMK#___
 - b. Emergency equipment? Yes No N/A ___RMK#___
 - c. Emergency systems? Yes No N/A ___RMK#___

4. Does emergency training described in 3(a), (b) and (c) above include, *where applicable*: [3745-65-16(A)(3)(a-f)]
- a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? Yes No N/A ___RMK#___
- b. Key parameters for automatic waste feed cut-off systems? Yes No N/A ___RMK#___
- c. Communication or alarm system? Yes No N/A ___RMK#___
- d. Response procedures for fire/explosions? Yes No N/A ___RMK#___
- e. Response to groundwater contamination incidents? Yes No N/A ___RMK#___
- f. Shutdown procedures? Yes No N/A ___RMK#___
5. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A ___RMK#___
6. 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 ___RMK#___
7. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No N/A ___RMK#___
8. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)] Yes No N/A ___RMK#___
9. 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 ___RMK#___

10. **Optional:** 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 manifests, etc.

<u>Job Performed</u>	<u>Name of Employee</u>	<u>Date(s) Trained</u>

REMARKS

2.) Tennessee Gas Pipeline has an on-line training program for their employees, which is done yearly.

CONTINGENCY PLAN

1. Does the generator have a contingency plan which describes the following: [3745-65-52(A) through (F)]
- a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? Yes No N/A ___RMK#___
- b. Arrangements with emergency authorities? [3745-65-37] Yes No N/A ___RMK#___
- c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? Yes No N/A ___RMK#___
- d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? Yes No N/A ___RMK#___
- e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary? Yes No N/A ___RMK#___

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. [3745-65-52(B)]

2. Is the plan designed 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 ___RMK#___
3. 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 ___RMK#___
4. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] Yes No N/A ___RMK# 3___

EMERGENCY COORDINATOR

5. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes No N/A ___ RMK# ___

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

6. 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 ___ RMK# ___
- a. Was the contingency plan implemented? [3745-65-51(B)] Yes ___ No N/A RMK# ___
- b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes ___ No N/A RMK# ___
- c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes ___ No N/A RMK# ___

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.

REMARKS

- 3.) The Emergency Operations and Procedures plan is updated quarterly.

PREPAREDNESS AND PREVENTION [3745-52-34(A)(4)]

1. 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 ___RMK#___
2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]
- a. Internal alarm system? Yes No N/A ___RMK#_4_
- b. Emergency communication device? Yes No N/A ___RMK#_4_
- c. Portable fire control, spill control and decon equipment? Yes No N/A ___RMK#___
- d. Water of adequate volume/pressure? Yes No N/A ___RMK#___
3. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes ___ No N/A ___RMK#___
4. Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33] Yes ___ No N/A ___RMK#___
5. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32*)? [3745-65-34] Yes No N/A ___RMK#___
6. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A ___RMK#___
7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes No N/A ___RMK#___
- a. 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 RMK#___

REMARKS

4.) The facility uses a horn blast system for signaling, and cell phones and radios for emergency communication.

GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)] Yes No N/A RMK#

2. Is the facility a metal finisher that generates waste water treatment sludge with a F006 waste code? If yes: Yes No N/A RMK#

NOTE: If yes, they may accumulate F006 waste on-site for up to 180 days; or up to 270 days if they must transport the F006 waste over 200 miles for off-site metals recovery; without an Ohio hazardous waste permit, provided that they meet these special conditions (OAC 3745-52-34(G) and (H)):

a. The generator has implemented pollution prevention practices that reduce the amount of any hazardous substances, pollutants or contaminants entering F006 or otherwise released to the environment prior to its recycling (see your P2 coordinator for a copy of Federal Register 3/00 for a listing of examples of P2 measures, the facility should be prepared to demonstrate this request); Yes No N/A RMK#

b. The F006 waste is legitimately recycled through metals recovery. Yes No N/A RMK#

c. No more than 20,000 kg. of F006 is accumulated on-site at any one time. Yes No N/A RMK#

d. The facility complies with the applicable management standards for containers, tanks or containment buildings for LQGs. Yes No N/A RMK#

SATELLITE ACCUMULATION AREA REQUIREMENTS [3745-52-34(C)(1)]

3. Does the generator ensure that satellite accumulation area(s):

a. Are at or near a point of generation? Yes No N/A RMK#

b. Are under the control of the operator of the process generating the waste? Yes No N/A RMK#

c. Do not exceed a total of 55 gallons of hazardous waste? Yes No N/A RMK#

- d. Do not exceed one quart of acutely hazardous waste at any one time? Yes No N/A RMK#
- e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? Yes No N/A RMK#

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. The inspector should refer to Guidance Document #DHWM-008, Satellite Accumulation Under Ohio Hazardous Waste Rules.

4. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so: Yes No N/A RMK#
- a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? Yes No N/A RMK#
- b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? Yes No N/A RMK#

USE AND MANAGEMENT OF CONTAINERS

5. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes No N/A RMK#
6. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes No N/A RMK#
7. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A RMK#
- b. In good condition? [3745-66-71] Yes No N/A RMK#
- c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A RMK#

- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A ___ RMK#___
8. Is the container accumulation area(s) inspected weekly? [3745-66-74] (*Note location in general information section of checklist*) Yes ___ No N/A ___ RMK#___
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A ___ RMK#___
9. For ignitable and/or reactive hazardous waste(s):
- a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes No N/A ___ RMK#___
- b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] Yes No N/A ___ RMK#___

PRE-TRANSPORT REQUIREMENTS

10. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] Yes No N/A ___ RMK#___
11. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A ___ RMK#___
12. 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 ___ RMK#___

REMARKS

USED OIL INSPECTION CHECKLIST (Short Version)

NOTE: *This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.*

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes ___ No N/A ___ RMK# ___
- Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] Yes ___ No N/A RMK# ___
2. Is used oil being used as a dust suppressant? [3745-279-12(B)] Yes No N/A ___ RMK# ___
3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12©? Yes ___ No N/A RMK# ___

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes ___ No N/A RMK# ___
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 RMK# ___
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] Yes No N/A ___ RMK# ___
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 ___ RMK# ___
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22©] Yes ___ No N/A ___ RMK# 5
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 RMK# ___
- b. Contained the release? Yes ___ No N/A RMK# ___

- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A RMK#___
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No N/A RMK#___
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes ___ No ___ N/A RMK#___
- 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 RMK#___
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes ___ No N/A RMK#___
- c. Are the combustion gases from heater vented to the ambient air? Yes ___ No N/A RMK#___
11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes ___ No N/A RMK#___

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. 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 RMK#___
13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes ___ No N/A RMK#___
14. 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 RMK#___

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes No N/A ___ RMK#___

REMARKS

5) On December 19, 2006, the drum being used in the Pipeline Shop to collect used oil from the oil filter crusher was not labeled with the words "used oil."

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 ___ RMK# ___
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes No N/A ___ RMK# ___

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE LAMPS

3. Does the SQGUHW 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 N/A ___ RMK# 7
4. 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 RMK# ___
5. 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 ___ RMK# 7

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.

- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes No N/A RMK#
16. 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 N/A RMK#
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes No N/A RMK#
17. 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 N/A RMK#
18. 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 N/A RMK#

EXPORTS

19. Is waste being sent to a foreign destination? If so: Yes No N/A RMK#
- 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 N/A RMK#
- b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)] Yes No N/A RMK#
- c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes No N/A RMK#

REMARKS

7.) At the time of the December 19, 2006 inspection, lamps were stored in an open trash can. The container had not been labeled as a universal waste or marked in a way that would allow documentation of the length of time waste is stored.

LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] **If so:** Yes No N/A ___ RMK# ___
- a. **For determinations based solely on knowledge of the waste:** Is supporting data retained on-site? [3745-270-07(A)(6)] Yes No N/A ___ RMK# ___
- b. **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes No N/A ___ RMK# ___
2. Has the generator determined each Ohio EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2), see Table 1] Yes No N/A ___ RMK# ___
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes No N/A ___ RMK# ___
4. Does the generator generate a characteristic hazardous waste? **If so:** Yes No ___ N/A ___ RMK# ___
- a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes No N/A ___ RMK# ___
- NOTE:** *If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.*
5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] **If so:** Yes ___ No ___ N/A RMK# ___
- a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes ___ No N/A RMK# ___
- NOTE:** *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]*
6. Has the generator **correctly** determined if restricted wastes meet or exceed treatment standards? [3745-270-07(A)(1)] Yes No N/A ___ RMK# ___

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] Yes No N/A ___ RMK# ___

NOTE: *A generator may dilute a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit (§402 of CWA), that treats waste in a CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non-wastewater.*[3745-270-03(B)]

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] Yes No N/A ___ RMK# ___

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes No N/A ___ RMK# ___

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] **If so:** Yes ___ No N/A ___ RMK# ___

a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05]

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] **If so:** Yes ___ No N/A ___ RMK# ___

a. The facility can land dispose of the waste. [3745-270-06]

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? **If so:** Yes ___ No N/A ___ RMK# ___

a. Has the facility complied with 3745-270-04? Yes ___ No N/A RMK# ___

NOTIFICATION AND CERTIFICATION REQUIREMENTS

1. If a generators' waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1? [3745-270-07(A)(2)] Yes No N/A ___ RMK# ___
2. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1? [3745-270-07(A)(3)] Yes No N/A ___ RMK# ___
3. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1? [3745-270-07(A)(4)] Yes ___ No N/A RMK# ___
4. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1? [3745-270-07(A)(9)] Yes ___ No N/A RMK# 6
5. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] **If so:** Yes ___ No ___ N/A RMK# ___
- a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes ___ No N/A RMK# ___

NOTE: *Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit. (See 270-07(A)(7))*

6. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)] Yes No N/A ___ RMK# ___

REMARKS

- 6.) Lab pack waste had been generated but not yet manifested off-site at the time of the inspection.

GENERATORS TREATING HAZARDOUS WASTE

1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40? Yes ___ No ___ N/A RMK# ___
2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)] Yes ___ No N/A RMK# ___
- a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)] Yes ___ No N/A RMK# ___
- b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] Yes ___ No N/A RMK# ___
3. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] Yes ___ No N/A RMK# ___
4. Have the treated wastes met the applicable treatment standards in 3745-270-40? Yes ___ No N/A RMK# ___

NOTE: *If the waste is a characteristic waste, which has been treated to render it non hazardous and subsequently sent to a solid waste landfill, proceed to question 7 & 8.*

5. Has the generator sent a notification and certification with the initial shipment of waste? [3745-270-07(A)(5)(c)] Yes ___ No N/A RMK# ___
6. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)] Yes ___ No N/A RMK# ___
7. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following:
- i. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes ___ No N/A RMK# ___
- ii. A description of the waste, including EPA hazardous waste numbers and treatability group, and UHCs? [3745-270-09(D)(1)(b)] Yes ___ No N/A RMK# ___

NOTE: *If the waste will be treated and monitored for all UHCs then they do not need to be listed on the notice.*

8. Has the process/operation generating the waste or the solid waste landfill facility changed? If so: Yes ___ No ___ N/A RMK# ___
- a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)] Yes ___ No N/A RMK# ___
- b. Has the director been notified of such changes? [3745-270-09(D)] Yes ___ No N/A RMK# ___

NOTE: *The director need only be notified on an annual basis but no later than December 31.*

9. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: Yes ___ No ___ N/A RMK# ___
- a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49(C)] Yes ___ No N/A RMK# ___
10. Does each notification/certification form completed, contain the information found in Table 1? [3745-270-07(A)(3)] Yes ___ No N/A RMK# ___

NOTE: *If the waste will be treated and monitored for all constituents, there is no need to put them all on the LDR notice.*

HAZARDOUS DEBRIS

1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)? Yes ___ No ___ N/A RMK# ___
2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.) Yes ___ No ___ N/A RMK# ___
3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so: Yes ___ No ___ N/A RMK# ___
- a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)] Yes ___ No N/A RMK# ___

NOTE: *If immobilization has been used in a treatment train, it must be the last treatment technology used.*

4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so: Yes ___ No ___ N/A RMK# ___
- a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)] Yes ___ No N/A RMK# ___
5. Is the waste a PCB waste under 40 CFR Part 761? If so: Yes ___ No ___ N/A RMK# ___
- a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 270? [3745-270-45(A)(5)] Yes ___ No N/A RMK# ___
6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)] Yes ___ No N/A RMK# ___
7. Does the owner/operator of a treatment facility that claims the debris is excluded under 3745-51-03(F)(1) maintain the following information?
- a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)] Yes ___ No ___ N/A RMK# ___
- b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)] Yes ___ No N/A RMK# ___
- c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)] Yes ___ No N/A RMK# ___
8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F) have the following information? [3745-270-07(D)(3)]
- a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)] Yes ___ No N/A RMK# ___
- b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)] Yes ___ No N/A RMK# ___

c. Technology used from Table 1? [3745-270-07(D)(1)(c)]

Yes ___ No N/A RMK# ___

9. Has the above notification been sent to the director? [3745-270-07(D)(1)]

Yes ___ No N/A RMK# ___

TREATING FACILITIES

1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-14? [3745-270-07(B)]

Yes ___ No N/A RMK# ___

2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)]

Yes ___ No N/A RMK# ___

Note: *No further notification is necessary until such time that the waste changes or the receiving facility changes.*

3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07? [3745-270-07(B)(3)]

Yes ___ No N/A RMK# ___

4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so:**

Yes ___ No ___ N/A RMK# ___

a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)]

Yes ___ No N/A RMK# ___

5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-58-30? **If so:**

Yes ___ No ___ N/A RMK# ___

a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)), excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)]

Yes ___ No N/A RMK# ___

b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4) [3745-270-07(B)(6)]

Yes ___ No N/A RMK# ___

c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)]

Yes ___ No N/A RMK# ___

6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)] Yes ___ No N/A RMK# ___
7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-70 have:
- a. Copies of all notices and certifications required in 3745-270? Yes ___ No N/A RMK# ___
- b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49? Yes ___ No N/A RMK# ___
- c. Followed the testing frequency specified in the facilities WAP? Yes ___ No N/A RMK# ___

REMARKS