



State of Ohio Environmental Protection Agency

Northeast District Office



2110 East Aurora Road
Twinsburg, OH 44087-1924

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

January 31, 2007

RE: HUKILL CHEMICAL CORPORATION
TSD/LQG/TRANSPORTER
OHD001926740/02-18-0315
CUYAHOGA COUNTY
NOTICE OF VIOLATION

Mr. Tim Jones
EH&S Manager
Hukill Chemical Corporation
7013 Krick Road
Bedford, OH 44146

Dear Mr. Jones:

On December 4 and 6, 2006, I conducted a compliance evaluation inspection at Hukill Chemical Corporation (HCC), located in Bedford, Ohio. I inspected HCC to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). HCC was represented by you, Jeff McGlynn, and Ed Potoma. At the end of the inspection, I conducted an exit interview with you, Jeff McGlynn, Ed Potoma, Vince Valentino and Rob Hukill.

Two meetings have been held to clarify and discuss information obtained during the inspection. The first meeting was on December 19, 2006, and the second meeting was on January 10, 2007. Those attending the December 19, 2006 meeting from Ohio EPA were Natalie Oryshkewych and me, and HCC was represented by you, Jeff McGlynn, Ed Potoma, Vince Valentino and Rob Hukill. The January 10, 2007 meeting was attended by Natalie Oryshkewych, Kurt Princic, Bill Skowronski and me, all representatives of Ohio EPA, and Vince Valentino, Rob Hukill, and you, all from HCC.

At both meetings we discussed the pending notice of violation. During the second meeting HCC requested that they be allowed to respond to the pending violations as an attachment when the NOV is sent. On January 16, 2007, I received the memo, via email, from Vince Valentino. The "Hukill Chemical Corporation Comments Concerning Recent Non-Compliance" memo has been attached to this NOV as Attachment 1.

After reviewing my notes and documentation obtained during the inspection, I requested additional paperwork to review. This paperwork included the daily drum logs for December 2006, signed hazardous waste manifests, tank transfer tickets and drum processing reports. I received the remaining drum logs I requested on January 8, 2007.

I have enclosed copies of the inspection checklists for your records. Based on the inspection, review of the documentation submitted, and meetings with facility representatives, Ohio EPA has determined that HCC was in violation of Ohio's hazardous waste laws and its hazardous waste operating permit. The following violations were noted:

1. **Ohio Revised Code Section 3734.02 (E) and (F) and Permit Condition A.5. Storage of off-site hazardous waste in a tank not permitted to accept off site hazardous waste.**

While reviewing paperwork obtained during the inspection, I noted that, on several occasions, drums of hazardous waste had been directly off-loaded into Tank 13. I called you to let you know that off-site waste cannot be placed directly into Tank 13. Tank 13 is a generator waste tank and may store only HCC generated waste. HCC waste includes bottoms from the thin film evaporators or hazardous waste fuel that has been processed through the hochmeyer and auger. I was later contacted by Mr. Valentino who told me that off-site drums of waste were routinely pumped into Tank 13.

Based on the information obtained during the inspection, Ohio EPA has determined that HCC has been conducting unauthorized storage of hazardous waste in Tank 13. HCC has stopped using this tank for unauthorized hazardous waste management activities. If HCC wants to use Tanks 13 for storage of off-site hazardous waste, please submit a permit modification to do so. No further action is required by HCC.

Attachment 1 is HCC's response to the unauthorized storage of off-site waste in Tank 13.

2. **Ohio Revised Code Section 3734.02(E) and (F) and Permit Condition A.5. Storing hazardous waste in an unauthorized area of the facility.**

On December 6, 2006, I noted two placarded trailers (9483 and 9484) parked in an area of the property where I have not seen placarded trailers parked before. The signed manifests showed that one truck arrived at HCC on December 1, 2006 (Manifest 72691, accepted 12/02/06) and one arrived December 5, 2006 (Transporter was Solvent Systems International, Inc., accepted 12/6/06). Normally, when a box trailer arrives it is parked at the loading dock, paper work is checked, drums are unloaded, sampled, entered into inventory (drum inventory log) and are moved into the container storage room within 24 hours of arrival. (See Section D, page 3 of the part B permit application).

I reviewed the drum inventory logs for December and did not find an entry for the drums accompanied by Manifest 72691. Although the drums arrived at HCC on 12/1/2006 (Manifest 72691, 88 drums for reclamation) it appears the shipment was never entered into the drum inventory log. All 88 drums were processed on 12/7/2006 per the hazardous waste drum processing report.

The drums that arrived on 12/5/2006 were a "milk run" of drums from many generators, therefore, there was more than one manifest accompanying this shipment. The following manifests are associated with the shipment: 71768, 72897, 72903, 72894, 72893, 72891, 72889, 72892, 72899, 72900, 72901, 72902, 72896.

The manifests show that the drums were accepted by HCC on 12/06/2006. The drums were not entered into inventory until 12/11/06 (Manifests 71768, 72897, 72903, 72894, 72893, 72891) and 12/12/06 (Manifests 72889, 72892, 72899, 72900, 72901, 72902). The four drums shipped on manifest 72896 were never entered into the drum inventory log based on my review of the drum logs for December 2006.

By acting as a transfer facility, HCC created an unauthorized container storage area, in violation of ORC 3734.02(E) and (F). HCC has since stopped acting as a transfer facility.

To demonstrate an abatement of this violation, please provide the following:

- A. The date the 4 drums on manifest 72896 were entered into the drum inventory log and/or the day they were processed. If they have been processed, please include a copy of the hazardous waste drum processing report.
- B. Manifest 72691. Explain why the 88 drums were not entered into the drum inventory log and why they were not moved into the container storage room.

Per the part B permit application and my previous inspections, drums/totes that arrive onsite have been stored in the container storage room until HCC is ready to process them. HCC will need to modify the part B permit application and modify the drum inventory log to account for drums that are not stored prior to reclamation.

Attachment 1 is HCC's explanation as to why they allowed the trucks to sit onsite.

Based on violation 2, HCC is also in violation of the following rule:

3. Ohio Administrative Code (OAC) rule 3745-54-73(B)(2) and Permit Condition B.21; Operating Record.

The owner or operator must keep a written operating record at the facility. The following information must be recorded: The location of each hazardous waste within the facility and the quantity at each location. The information must include cross-references to specific manifest documentation.

As noted in violation number 2, HCC failed to record the location of the drums of hazardous waste that arrived on trucks 9483 and 9484, (12/1/2006 and 12/5/2006) in the written operating record for the facility, as is required by this rule. The location of all drums/totes containing offsite hazardous waste is found in the drum inventory log. This drum inventory log is printed out daily. The drums that arrived on 12/1/2006 were never entered into the drum inventory log. Drums that arrived on 12/5/2006 were not entered into the log until 12/11/2006/ or 12/12/2006. The drums accompanied by Manifest 72896, do not appear to have been entered into inventory.

Other drums that were not entered into the drum inventory log in December 2006 are listed below:

Manifest 72100, line item 1, 33 drums, received 11/28/2006. Please provide the drum processing report for these drums. If the drums weren't processed until December, explain why they were not in the December drum inventory log and where they were stored prior to processing. (If these drums were processed in November they wouldn't have shown up in the December drum inventory log, which will explain why I didn't see them listed in the December drum inventory log.)

Manifest 72490, 19 drums received 12/2/2006. The drums were processed 12/11/2006. Explain why they were not entered into the drum inventory log and where they were stored prior to processing.

Manifest 72870, 28 drums were received 12/8/2006. The drums were processed 12/11/2006. Because the drums were received on a Thursday and processed on a Monday, they may not have been entered into the drum inventory. Explain where they were stored prior to processing.

Manifest 72708, 88 drums received 12/7/2006. 44 drums were processed on 12/8/2006 and 44 were processed on 12/9/2006. 44 drums should have been listed in the 12/8/2006 drum inventory log since they were not processed until 12/9/2006. Explain why they were never entered into the drum inventory log.

A concern by Ohio EPA with the failure to enter the number of drums received into the drum inventory log is that the storage location of containers of hazardous waste is unaccounted for and that the volume of hazardous waste onsite is greater than the permitted amount of 55,000 gallons of containerized waste.

Another concern Ohio EPA has with the drum inventory log is that it is only accurate for the moment in time it is printed. For example, if I wanted to know how many drums were onsite at 3:00 P.M. the day before my inspection, I would not be able to obtain that information. I would only know how many drums were onsite that day at the time the inventory log had been printed. If I wanted to know how many drums were onsite over the weekend, this information would be unavailable to me because the drum inventory log is not printed out on the weekends.

To abate the violation, please provide the information requested for each manifest item listed above. Additionally, HCC must revise the drum inventory log to meet the requirements of this rule.

The following issue was discussed.

Over the course of the last several inspections, the topic of "process chemical" has been discussed, but what it is and what its value is has not been satisfactorily explained. My current understanding of "process chemical" is that it is material that comes off the luwas or the frac tower that is not a product or a waste, but is something that can be "reused". However, there are times that the material is not reusable and is determined to be hazardous waste. When the determination is made that it is hazardous waste, the material is blended into chem fuel. Any material collected in a drum would be a hazardous waste and is labeled hazardous waste instead of process chemical.

During the walk through on December 19, 2006, I noted the following labels on containers located on the back dock:

Process Chemical, Tower MeCl₂, 5/4/2005; and
High Cl, 6 of 6-off of Tower, 12-8-06, hazardous waste label.

I was told the hazardous waste label was incorrect for the material dated 12/8/2006 and that the material was process chemical and usable. Please provide the following information about the drums dated 5/4/2005 and 12/8/2006:

What is the material in the drums, the process(s) that generated the material, how and when it will be re-used, what is its value to HCC, and any waste analysis data.

To resolve the process chemical issue, please provide a written explanation detailing what cuts on the tower or luwas "generate" the material known as process chemical. Please include the criteria that are used to determine if the material is usable or hazardous waste. Please begin keeping a log of the material to demonstrate that 75% of the process chemical is used within each calendar year so as to not be conducting speculative accumulation.

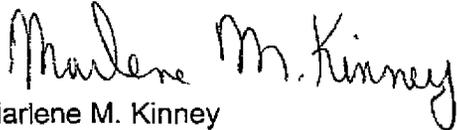
Please submit the requested documentation within 30 days of your receipt of this letter. Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

You can find copies of the rules and other information on the hazardous waste division's web page at <http://www.epa.state.oh.us/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/opp>.

The Division of Hazardous Waste Management has created an electronic news service to provide the regulated community with news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign up for this free service by going to: <http://www.epa.state.oh.us/dhwm/listserv>.

Should you have any questions or concerns, please do not hesitate to call me at (330) 963-1162.

Sincerely,



Marlene M. Kinney
Environmental Specialist
Division of Hazardous Waste Management

MMK:ddw

Enclosure

cc Regional Offsite Administrator, DE-9J, USEPA Region V
Harry Sarvis, DHWM, CO
ec Natalie Oryshkewych, DHWM, NEDO

Inspected when operating under permit
 Issued 10/30/98.

OHIO PART B PERMITTED FACILITY
 RCRA INSPECTION CHECKLIST

Facility: Hubbell Chemical Ohio Permit: 02-18-0315
 Address: 7013 Knick Rd U.S. EPA ID: OH0 001 926 740
Bedford OH 44146 Phone: 440 232 9400
 County: Cuyahoga
 Inspection Date: 12/14/06 Time: _____
 Was advance notice of the inspection given? _____ YES NO
 If so, how far in advance? _____

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspectors:	<u>Marlene Kenney</u>	<u>- OEPA</u>	<u>330-963-1162</u>
Facility Reps:	<u>Tim Jones</u>	<u>HCC</u>	<u>440-232-9400</u> <u>ext 1230</u>

Is facility operating as a generator? YES NO

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

PERMIT STATUS Validated under Permit Issued 10/30/98.

Permit Issued: 12/28/06 LDR Checklist Attached: Yes No
 Permit Effective Date: 12/28/06 Used Oil Checklist Attached: Yes No
 Permit Expiration Date: 12/28/16 Generator Checklist Attached: Yes No
 Permit Renewal Date: _____
 Permit Modification Date(s): _____

AUTHORIZED ACTIVITIES

STORAGE		TREATMENT		DISPOSAL	
<input checked="" type="checkbox"/>	Containers	<input checked="" type="checkbox"/>	Tanks		Injection Well
<input checked="" type="checkbox"/>	Tanks		Incinerator		Landfill
	Waste Pile		Thermal Treatment		Land Application
	Surface Impoundment		Post-Closure		Surface Impoundment

Post-Closure Care Corrective Action

Table of Contents

GENERAL PERMIT COMPLIANCE AND ACTIVITIES	<u>1</u>
PERMIT MODIFICATION, REVISION, REVOCATION	<u>3</u>
SITE ENTRY - AVAILABILITY OF RECORDS	<u>5</u>
RECORDKEEPING/OPERATING REQUIREMENTS	<u>6</u>
OPERATING RECORD	<u>6</u>
DOCUMENTS TO BE MAINTAINED AT FACILITY	<u>7</u>
ANNUAL REPORT REQUIREMENT	<u>8</u>
SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS	<u>8</u>
WASTE MINIMIZATION REQUIREMENTS	<u>9</u>
GROUND WATER MONITORING	<u>10</u>
WASTE ACCEPTANCE AND GENERATION	<u>10</u>
OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS	<u>11</u>
WASTE ANALYSIS/WASTE ANALYSIS PLAN	<u>13</u>
GENERAL INSPECTION REQUIREMENTS	<u>14</u>
SECURITY REQUIREMENTS	<u>16</u>
FACILITY OPERATIONS	<u>16</u>
PERSONNEL TRAINING	<u>17</u>
REQUIRED EQUIPMENT	<u>18</u>
CONTINGENCY PLAN - EMERGENCY PROCEDURES	<u>19</u>
EMERGENCY COORDINATOR	<u>20</u>
IMPLEMENTATION OF CONTINGENCY PLAN	<u>22</u>
CLOSURE REQUIREMENTS	<u>24</u>
POST-CLOSURE MAINTENANCE	<u>25</u>
STORAGE OF HAZARDOUS WASTES IN CONTAINERS	<u>26</u>
CONDITION OF CONTAINERS	<u>26</u>
INSPECTIONS	<u>27</u>
CONTAINMENT SYSTEM	<u>27</u>
AISLE SPACE	<u>28</u>
LAND DISPOSAL RESTRICTION REQUIREMENTS	<u>28</u>
CORRECTIVE ACTION	<u>29</u>

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

*At time of inspection (12/4/06)
Renewal effective 12/28/06*

1. Has the expiration date of the permit passed? If so: Yes No N/A RMK#

a. Is the permittee continuing any activity regulated by the permit after the expiration date of the permit? Yes No N/A RMK#

b. Has the facility submitted an application for a permit renewal to the director no later than 180 days prior to the expiration date of the permit? [Condition A.6] Yes No N/A RMK#

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

3. Is the permittee conducting any hazardous waste management activities (not otherwise exempt by law) which are not authorized by the permit? [Conditions A.1(b) and A.5] Yes No N/A RMK#

*Violations
1 and 2*

*Established an unauthorized container storage area.
Storing offsite waste in Tank 13*

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

5. Has the facility identified any instances of noncompliance with the permit, ORC Chapter 3734, or the rules adopted thereunder, which may endanger human health or the environment? If so: Yes No N/A RMK#

a. Did the facility immediately report the following to Ohio EPA's Emergency Response Unit? [Condition A.20]

i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and Yes No N/A RMK#

ii. Information concerning a release of hazardous waste, fire or explosion at the facility which could threaten human health or the environment outside the facility including a description of:

Yes___ No N/A RMK#___

A. Name, address and telephone number of the owner/operator?

Yes___ No N/A RMK#___

B. Name, address and telephone number of the facility?

Yes___ No N/A RMK#___

C. Name and quantity of material(s) involved?

Yes___ No N/A RMK#___

D. The extent of injuries, if any?

Yes___ No N/A RMK#___

E. An assessment of the actual or potential hazard to the environment and human health outside the facility?

Yes___ No N/A RMK#___

F. Estimated quantity and disposition of recovered material that resulted from the incident?

Yes___ No N/A RMK#___

6. Did the permittee provide a written report to Ohio EPA's Emergency Response Unit and DHWM within five days of becoming aware of the circumstances reported in Questions No. 5? If so, did the report contain: [Condition A.21]

Yes___ No N/A RMK#___

a. A description of the noncompliance and its cause (including exact dates and times)?

Yes___ No N/A RMK#___

b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? and

Yes___ No N/A RMK#___

c. Steps taken or planned to minimize the impact on the environment and to reduce, eliminate and prevent recurrence of the noncompliance?

Yes___ No N/A RMK#___

NOTE: The permittee need not comply with the five day written report requirement if the director, upon good cause shown by the permittee, waives that requirement and the permittee submits a written report within 15 days of the time the permittee became aware of the circumstances. [Condition A.21].

7. Has the permittee identified other instances of noncompliance not provided for in Condition A.22, if so: Yes___ No N/A RMK#___

a. Did the permittee report these instances to Ohio EPA, DHWM? [Condition A.22]? Yes___ No N/A RMK#___

b. Do the reports provided contain the information set forth in Condition A.20? [Condition A.20] Yes___ No N/A RMK#___

c. Has the permittee taken all steps necessary to minimize releases to the environment or prevent any adverse impact on human health or the environment? [Condition A.8] Yes___ No N/A RMK#___

8. Has the permittee planned any changes in the permitted facility or activity which may result in noncompliance with the conditions of the permit?: Yes___ No N/A___ RMK#___

a. If so, has the facility provided Ohio EPA with advance notice of such changes? [Condition A.17] Yes___ No N/A RMK#___

NOTE: Such notification does not waive the permittee's duty to comply with the permit. [Condition A.17]

9. Has the permittee become aware that it failed to submit any relevant facts in the permit or issuance proceedings or that it submitted incorrect or incomplete information in permit issuance proceedings or other submissions to Ohio EPA or the Hazardous Waste Facility Board (HWFB)? If so: Yes___ No N/A___ RMK#___

a. Has the permittee properly submitted such facts or corrected information to the appropriate entity? [Condition A.24] Yes___ No N/A RMK#___

PERMIT MODIFICATION, REVISION, REVOCATION

10. Has the permittee filed a request for a permit modification, revision or revocation since permit issuance? [Condition A.2] Yes ___ No N/A ___ RMK# ___
11. Has the permit, been transferred to a new owner/operator? If so: Yes ___ No N/A ___ RMK# ___
- a. Has the transfer been conducted in accordance with ORC Chapter 3734. and the rules adopted thereunder which includes the permittee notifying the new owner in writing of the requirements of ORC Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules before transferring ownership? [Condition A.18] Yes ___ No N/A RMK# ___
12. Has the permittee submitted reports in any compliance schedule of the permit to Ohio EPA no later than 14 days following each scheduled date, unless otherwise specified? [Condition A.19] Yes No N/A ___ RMK# ___
13. Has the permittee furnished relevant information which Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, to determine compliance with the permit? [Condition A.10] Yes No N/A ___ RMK# ___
14. Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10] Yes No N/A ___ RMK# ___
15. Is the permittee maintaining records of all data used to complete the application and any amendments, revisions or modifications to the application? [Condition A.14©] Yes No N/A ___ RMK# ___
16. Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14©] Yes No N/A ___ RMK# ___
17. Is the permittee planning any physical alterations or additions to any permitted portions of the facility? If so: Yes ___ No N/A ___ RMK# ___

a. Has the permittee given notice to the director of such alterations/additions? [Condition A.15]

Yes___ No N/A RMK#___

SITE ENTRY - AVAILABILITY OF RECORDS

18. As specified in Condition A.11, has the permittee allowed the director or an authorized representative, upon proper identification to:

a. Enter at reasonable times upon the premises where a regulated activity is located or where records are kept under the conditions of the permit?

Yes No N/A ___ RMK# ___

b. Have access to and copy, at reasonable times, any records required to be kept under the conditions of the permit?

Yes No N/A ___ RMK# ___

c. Inspect, at any time, facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit?

Yes No N/A ___ RMK# ___

d. Sample, document, photograph or monitor, at reasonable times, any substances or parameter at the location of the facility to assure compliance with the permit or as otherwise authorized by ORC Chapter 3734. and the rules adopted thereunder?

Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM PART B APPLICATION

Note: *The inspector or permit writer may add questions pertaining to the permittee's application, as appropriate.*

REMARKS

RECORDKEEPING/OPERATING REQUIREMENTS

OPERATING RECORD

1. In accordance with OAC rules 3745-54-73 and 3745-54-74 and Condition B.22 of the permit, does the permittee maintain an Operating Record which contains the following information:

a. A description of the quantity of each hazardous waste and the method(s) and date(s) of its treatment or storage?

Yes No N/A ___ RMK# ___

b. The location of each hazardous waste and quantity at each location including cross-reference to specific manifest numbers?

Yes ___ No N/A ___ RMK# ___

c. Records and results of required waste analysis?

Yes No N/A ___ RMK# ___

d. Summary reports and details of all incidents that required implementation of the contingency plan?

Yes ___ No N/A RMK# ___

e. Records and results of required inspections?

Yes No N/A ___ RMK# ___

f. Documents required to be maintained by LDR requirements of OAC Chapter 3745-270?

Yes No N/A ___ RMK# ___

g. Monitoring, testing, or analytical data, and corrective action where required, from groundwater monitoring and required monitoring of surface impoundments, landfills, waste piles and land treatment units? [3745-54-73(B)(6)]

Yes No N/A ___ RMK# ___

h. **For disposal facilities**, location and quantity of each hazardous waste record on a facility map and cross-references to manifest document numbers? [3745-54-73(B)(2)]

Yes ___ No N/A RMK# ___

Violation #3

DOCUMENTS TO BE MAINTAINED AT FACILITY

2. In accordance with Condition A.28 of the permit, is the permittee maintaining the following documents at the facility:

a. Waste analysis plan in accordance with OAC rule 3745-54-13? Yes No N/A ___ RMK# ___

b. Contingency plan in accordance with OAC rule 3745-54-53? Yes No N/A ___ RMK# ___

c. Closure plan in accordance with OAC rule 3745-55-12? Yes No N/A ___ RMK# ___

d. Cost estimate for facility closure in accordance with OAC rule 3745-55-42? (Estimate only - adequacy will be evaluated by CO financial assurance personnel) [Condition B.36] Yes No N/A ___ RMK# ___

e. Personnel training plan and records required by OAC rule 3745-54-16? [Condition B.6] Yes No N/A ___ RMK# ___

f. Inspection schedules developed in accordance with OAC rules 3745-54-15, 3745-55-74 and 3745-55-95? [Condition B.5] Yes No N/A ___ RMK# ___

Volume 3
g. Operating record in accordance with OAC rule 3745-54-73? [Condition B.22] *Not recording in the location of all containers onsite*

Yes ___ No N/A ___ RMK# ___

h. Post-closure plan, as required by OAC rule 3745-55-18(A)? [Condition A.28(a)(viii)] Yes No N/A ___ RMK# ___

i. Annually-adjusted cost estimate for facility closure and post-closure, as required by OAC rules 3745-55-42 and 3745-55-44? [Condition A.28(a)(ix)] Yes No N/A ___ RMK# ___

3. Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from date of inspection? [Condition B.5]

Yes No N/A ___ RMK# ___

*updated list of
emergency
districts*

4. Have any of the documents in Question No. 2 been revised? [Condition A.15] If so:

Yes No N/A RMK#

a. Has the permittee submitted the revisions to Ohio EPA in accordance with OAC rule 3745-50-51?

Yes No N/A RMK#

b. Have all requirements of OAC rule 3745-50-51 been met, including, where required, Ohio EPA approval?

Yes No N/A RMK#

ANNUAL REPORT REQUIREMENT

5. Is the permittee complying with annual report requirements set forth in OAC rule 3745-54-75 and the additional report requirements set forth in OAC rule 3745-54-77? [Condition B.25]

Yes No N/A RMK#

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

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

a. Date(s), exact place(s), time(s) and method(s) of sampling or measurement?

Yes No N/A RMK#

b. Individual(s) who performed the sampling or measurement?

Yes No N/A RMK#

c. Date(s) analyses were performed?

Yes No N/A RMK#

d. Individual(s) who performed the analyses?

Yes No N/A RMK#

e. Analytical technique(s) or method(s) used?

Yes No N/A RMK#

f. Results of such analyses?

Yes No N/A RMK#

7. Have the methods used to obtain a representative sample of the waste to be analyzed included the appropriate SW-846 method or an equivalent method specified in the approved waste analysis plan? [Condition 12(a)]
Yes No N/A ___ RMK# ___

8. In accordance with Condition A.14 of the permit, is the permittee retaining records of monitoring information as required by the permit for at least three years from the date of sampling, including:

a. All calibration and maintenance records.
Yes No N/A ___ RMK# ___

9. Has Ohio EPA requested submittal of any reports or other information from the permittee? If so:
Yes ___ No N/A ___ RMK# ___

a. Have the submittals been signed and certified according to OAC rule 3745-50-42? [Condition A.13]
Yes ___ No N/A RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

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

REMARKS

WASTE MINIMIZATION REQUIREMENTS

1. Does the permittee certify at least once every year that a program is in place to reduce the volume and toxicity of hazardous waste generated in accordance with Condition A.29(a) and OAC rule 3745-54-73?
Yes No N/A ___ RMK# ___

*Due 180 days after permit issuance
Dec 28, 2006*
Due by June 28, 2007
Have received past waste min reports as required.

By June 28, 2007

2. Did the permittee submit the waste minimization report to Ohio EPA, Office of Pollution Prevention and NE District Office within 180 days of journalization of this permit? and updates biennially thereafter? [Condition A.29©]]

Yes No N/A RMK# _____

3. Has the permittee reduced the amount of waste (hazardous waste, solid waste, air emission, waste water discharges, etc.) this year generated at their facility by implementing pollution prevention/waste minimization?

Yes _____ No _____ N/A RMK# _____

If so, what amount of waste has the permittee reduced this year? _____

4. Has the permittee's company saved much money this year by implementing pollution prevention (reducing raw material usage, disposal fees, energy savings, etc.)?

Yes _____ No _____ N/A RMK# _____

If so, how much money has the permittee's company saved this year? _____

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

REMARKS

GROUND WATER MONITORING

1. Has the permittee conducted semi-annual sampling of their monitoring wells?

Yes No N/A _____ RMK# _____

2. Have they reported the results in the Annual Report to the director by March 1st as required by Condition B.25?

for 2005
Yes No N/A _____ RMK# _____
2006 is due March 1, 2007

INSPECTION ITEMS FROM THE PART B APPLICATION

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

REMARKS

WASTE ACCEPTANCE AND GENERATION

1. Is the permittee storing any containers of hazardous waste received from any off-site source that permittee is not permitted to store? [Condition A.1.] Yes No N/A RMK#

2. Has the permittee arranged to receive hazardous waste from a foreign or off-site source that the permittee is not permitted to store? [Condition A.1.] Yes No N/A RMK#

3. Has the permittee notified the director at least four weeks prior to the date the permittee expects to receive hazardous waste from a foreign source, as required by OAC rule 3745-54-12(A)? [Condition B.2(a)] Yes No N/A RMK#

INSPECTION ITEMS FROM THE PART B APPLICATION

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

REMARKS

OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS

1. Is the permittee complying with the following manifest requirements set forth in OAC Chapter 3745-52 and OAC rules 3745-54-70, 3745-54-71, 3745-54-72 and 3745-54-76: [Condition B.24]

a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, U.S. EPA Form 8700-22 and, if necessary, U.S. EPA Form 8700-22A in compliance with OAC rule 3745-52-20(A)?

Yes No N/A ___ RMK# ___

b. The manifest form used contains all information required by OAC rule 3745-52-20 and the minimum number of copies required by OAC rule 3745-52-22?

Yes No N/A ___ RMK# ___

c. The permittee has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with OAC rule 3745-52-20(B)(C)(D)?

Yes No N/A ___ RMK# ___

d. Prepared manifests have been signed by the permittee and initial transporter in compliance with OAC rule 3745-52-23?

Yes No N/A ___ RMK# ___

2. As a permittee that generates hazardous waste, are signed copies of all hazardous waste manifests and any documentation required for exception reports retained for at least three years at the facility as required by OAC rules 3745-52-40 and 3745-54-71(A)(5)?

Yes No N/A ___ RMK# ___

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

3. Does the permittee use only properly registered transporters when removing hazardous wastes?
[Condition A.16]

Yes No N/A ___ RMK# ___

Transporters:

4. Does the permittee give one copy of the manifest to the transporter, send one copy to the generator within 30 days, and keep one copy for at least three years? [3745-54-71(A)]

Yes No N/A RMK#

a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met? [3745-54-71(B)]

Yes No N/A RMK#

b. Are any significant discrepancies in the manifest, as defined in 3745-54-72(A) noted in writing on the manifest document?

Yes No N/A RMK#

5. Have any manifest discrepancies been reconciled within 15 days as required by 3745-54-72(B)? If not:

Yes No N/A RMK#

a. Has the owner/operator submitted the required information to the director?

Yes No N/A RMK#

6. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-54-76(A) been submitted to the director within 15 days?

Yes No N/A RMK#
Not applicable for time between this inspection and last one

WASTE ANALYSIS/WASTE ANALYSIS PLAN

1. Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information of the waste in accordance with OAC Chapters 3745-54 to 3745-57, 3745-218 and 3745-270 and the terms and conditions of the permit? [Condition B.3(a)]

Yes No N/A RMK#

2. Does the permittee follow the procedures described in the WAP (Application _____)? [Condition B.3(b)]

Yes No N/A RMK#

3. In accordance with OAC rule 3745-54-13(A)(3), does the permittee repeat the waste analysis when the process or operation generating the hazardous waste has changed, or at least annually? [Condition B.3]

Yes No N/A RMK#

4. **FOR OFF-SITE FACILITIES:** Are the sampling methods and procedures specified in the permittee's WAP that will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identification of the waste on the manifest [3745-54-13(c)]?

Yes No N/A RMK#

5. **FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER OAC 3745-270-04(A):**

Does the waste analysis plan include procedures and schedules for:

i. The sampling of impoundment contents? [3745-54-13(B)(7)]

Yes No N/A RMK#

ii. The analysis of test data? [3745-65-13(B)(7)]

Yes No N/A RMK#

iii. The annual removal of residues which are not delisted or which exhibit the characteristic of a hazardous waste and either do not meet treatment standards (OAC 3745-270-40 to 3745-270-49) or where no treatment standards have been established? [3745-54-13(B)(7)]

Yes No N/A RMK#

6. **Where applicable:** The methods which will be used to meet additional waste analysis requirements for specific waste management methods specified in rules 3745-54-17, 3745-57-14, 3745-57-41 and 3745-270-07 of the OAC? [3745-54-13(B)(6)]

Yes No N/A RMK#

7. Does the permittee place the results of all waste analyses in the facility operating record in accordance with OAC rule 3745-54-73?

Yes No N/A RMK#

INSPECTION ITEMS FROM THE PART B APPLICATION

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

REMARKS

GENERAL INSPECTION REQUIREMENTS

NOTE: Inspector may attach a copy of the inspection procedures and schedules. If so, the attached document is referenced as Appendix _____.

1. Is the permittee following the inspection procedures and schedules as set forth in the permit (_____ of the approved Part B permit application) and the requirements of OAC rules 3745-54-15(A), (C) and (D)?
[Condition B.5] Yes No N/A _____ RMK# _____

2. Is the permittee following the approved inspection schedule for inspecting: monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment as specified in OAC rule 3745-54-15(B)? Yes No N/A _____ RMK# _____
 - a. Is the schedule kept at the facility? [OAC rule 3745-54-15(B)(2)] Yes No N/A _____ RMK# _____

3. Does the permittee remedy deterioration or any malfunctions discovered by an inspection as required by OAC rule 3745-54-15(C)? [Condition B.5] Yes No N/A _____ RMK# _____

4. In accordance with OAC rule 3745-54-15(D) and Condition B.5 of the permit, do inspection records contain the following information:
 - a. Date and time of inspection? Yes No N/A _____ RMK# _____
 - b. Name of inspector? Yes No N/A _____ RMK# _____
 - c. Notation of observations made? Yes No N/A _____ RMK# _____

d. Date and nature of any repairs or other remedial actions?

Yes No N/A RMK#

INSPECTION ITEMS FROM THE PART B APPLICATION

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

REMARKS

SECURITY REQUIREMENTS

1. Is the permittee complying with the following security provisions of OAC rule 3745-54-14 and Condition B.4 of the permit: [____ of the Part B permit application]
- a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility? Yes No N/A ____ RMK# ____
- b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility? Yes No N/A ____ RMK# ____
- c. A means to control entry, at all times, through gates or other entrances, to the active portion of the facility? Yes No N/A ____ RMK# ____
2. In accordance with OAC rule 3745-54-14©), does the permittee have signs reading "Danger - Unauthorized Personnel Keep Out" posted at entrances of the hazardous waste container storage building number ____? Yes No N/A ____ RMK# ____

FACILITY OPERATIONS

3. Is construction, maintenance and operation of the facility being conducted to minimize the possibility of a fire, explosion, or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, ground or surface water? [OAC rule 3745-54-31; Condition B.1] Yes No N/A ____ RMK# ____
4. Does the permittee properly maintain and operate the facility to achieve compliance with the terms and conditions of the permit including: [Condition A.9]
- a. Effective management practices? Yes ____ No N/A ____ RMK# ____
- b. Adequate funding? Yes ____ No N/A ____ RMK# ____
- c. Adequate operator staffing and training? Yes ____ No N/A ____ RMK# ____

d. Adequate laboratory and process controls?

Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

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

REMARKS

PERSONNEL TRAINING

1. Is the permittee conducting personnel training in accordance with the conditions of the permit and with the following requirements of OAC rule 3745-54-16? [Condition B.6]

Yes No N/A ___ RMK# ___

a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC rule 3745-54-16(A)(B)©]

Yes No N/A ___ RMK# ___

b. The facility provides personnel training to new employees within six months after their date of employment as required by OAC rule 3745-54-16(B)?

Yes No N/A ___ RMK# ___

c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16©)?

Yes No N/A ___ RMK# ___

2. Is the permittee maintaining personnel training records as required by OAC rule 3745-54-16(D) and of the approved application, including: written job titles, job descriptions and documented employee training records? [Condition B.6]

Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

→ should discuss part B permit at next annual refresher training

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

REMARKS

REQUIRED EQUIPMENT

NOTE: Inspector may attach a list of emergency equipment. If so, the attachment document is referenced as Appendix _____.

1. Has the permittee equipped the facility with the following emergency equipment as required by OAC rule 3745-54-32 and Condition B.9 of the permit:
 - a. An internal communications or alarm system? Yes No N/A _____ RMK# _____
 - b. A device such as a telephone which is capable of summoning emergency assistance from local emergency authorities? Yes No N/A _____ RMK# _____
 - c. Portable fire extinguishes and/or fire control equipment, spill control and decontamination equipment? Yes No N/A _____ RMK# _____
 - d. Water in adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers or water spray systems? Yes No N/A _____ RMK# _____
2. Is the permittee inspecting, testing and maintaining the equipment specified in Question No. 1 to ensure its proper operating in accordance with OAC rule 3745-54-33 and Condition B.10 of the permit? Yes No N/A _____ RMK# _____
3. Whenever hazardous waste is being managed at the facility, has the permittee provided all personnel involved in the operation with immediate access to an internal alarm or emergency communication device as required by OAC rule 3745-54-34 and Condition B.11 of the permit? Yes No N/A _____ RMK# _____

INSPECTION ITEMS FROM THE PART B APPLICATION

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

REMARKS

CONTINGENCY PLAN - EMERGENCY PROCEDURES

1. In compliance with Condition B.13 of the permit and OAC rule 3745-54-37(A) and (B), does the permittee:
- a. Familiarize emergency response agencies with the layout of the facility, associated hazards, places where personnel will normally be working, entrances and possible evacuation routes? Yes No N/A RMK#
 - b. Inform such agencies of safety equipment, supplies, proper emergency safety procedures that are applicable to the facility? Yes No N/A RMK#
 - c. Familiarize the local hospital listed in the approved application with the properties of hazardous waste handled at the facility and the types of injuries or illness that could result from fires, explosions or releases at the facility? Yes No N/A RMK#
2. Has a state or local agency declined to enter into the arrangements set forth in OAC rule 3745-54-37(A)? If so: Yes No N/A RMK#
- a. Has the permittee documented the refusal in the operating record as required by OAC rule 3745-54-37(B)? [Condition B.13(b)] Yes No N/A RMK#

3. Has the permittee, in accordance with OAC rule 3745-54-53 submitted a copy of the approved contingency plan (including amendments, revisions or changes) to all local authorities, agencies and response contractors designated in the approved contingency plan? [Condition B.18(b)] Yes No N/A ___ RMK# ___
4. Has the permittee notified all parties identified in the contingency plan in writing of amendments, modifications, or revisions to the plan within ten days of the effective date of the change in the plan? [Condition B.18(b)] Yes No N/A ___ RMK# ___
5. Has the permittee submitted a copy of the approved contingency plan and all revisions, amendments and modifications to the Ohio EPA, Division of Emergency and Remedial Response (DERR) in accordance with OAC rule 3745-54-53? [Condition B.18(c)] Yes No N/A ___ RMK# ___
6. Is the permittee reviewing the approved contingency plan at least annually and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17] Yes No N/A ___ RMK# ___

NOTE: Also see Question No. 4 of Recordkeeping Requirements to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.

EMERGENCY COORDINATOR

7. In accordance with OAC rule 3745-54-55 and Condition B.19 of the permit, is an emergency coordinator on premises or on call at all times? Yes No N/A ___ RMK# ___
8. In accordance with OAC rule 3745-54-55 and Condition B.19 of the permit, is/are the emergency coordinator(s) at the facility familiar with the following:
- a. Contingency plan? Yes No N/A ___ RMK# ___
- b. Facility operations/activities? Yes No N/A ___ RMK# ___

c. Waste characterization and location?

Yes No N/A ___ RMK# ___

d. Location of all records in the facility?

Yes No N/A ___ RMK# ___

e. Facility layout?

Yes No N/A ___ RMK# ___

9. In accordance with OAC rule 3745-54-55, does/do the emergency coordinator(s) have the authority to commit the resources needed to carry out the contingency plan? [Condition B.19]

Yes No N/A ___ RMK# ___

10. Does the permittee have a contingency plan for the facility that: [Condition B.19]

a. Describes the actions facility shall take to comply with OAC rules 3745-54-51 through 3745-54-56 in response to fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil or surface water at the facility?

Yes No N/A ___ RMK# ___

b. Describes arrangements agreed to by local police, fire departments, hospitals, contractors and Ohio EPA and the local emergency response team to coordinate emergency services?

Yes No N/A ___ RMK# ___

c. Includes an up-to-date list of names, addresses and phone numbers (office and home) for all persons qualified to act as emergency coordinator in the order that they will assume responsibility for coordination of emergency response?

Yes No N/A ___ RMK# ___

d. Includes a list of all emergency equipment, including fire extinguishing systems, spill control equipment, communications and alarm systems and decontamination equipment?

Yes No N/A ___ RMK# ___

e. Includes the location and a physical description of each item on the list referenced in Question No. 10(d), and a brief outline of its capabilities?

Yes No N/A ___ RMK# ___

f. Includes an evaluation plan for facility personnel describing signals to be used to begin evacuation, evacuation routes, and alternate evacuation routes, in situations where the primary routes could be blocked by releases of hazardous waste?

Yes No N/A RMK#

REMARKS

IMPLEMENTATION OF CONTINGENCY PLAN

11. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents at the facility including spill or release of hazardous waste or hazardous waste constituents greater than or equal to 55 gallons; any spill or release of hazardous waste or hazardous waste constituents less than 55 gallons may result in a fire or explosion hazard as determined by the Emergency Coordinator; or any spill on-site that may potentially cause on or off-site soil and/or ground or surface water contamination; any spill or release of hazardous waste or hazardous waste constituents that is reported to the National Response Center or local (city or county) emergency response center because the spill exceeded the "RQ" limits; any fire involving hazardous waste; any explosion involving hazardous waste; since the date of the last inspection? If so:

Yes No N/A RMK#

a. Did the permittee immediately implement the approved contingency plan and follow the emergency procedures described in OAC rule 3745-54-56? [Conditions B.14 and B.20]

Yes No N/A RMK#

b. Did the permittee immediately notify Ohio EPA's emergency response team using the 24-hour toll free number (800)282-9378 providing the following information: [OAC rule 3745-54-56(D)(2)]

i. Name and telephone number of the reporter?

Yes No N/A RMK#

ii. Name and address of the facility?

Yes No N/A RMK#

- iii. Time and type of incident? Yes___ No N/A RMK#___
- iv. Name and quantity of materials involved? Yes___ No N/A RMK#___
- v. The extent of injuries? Yes___ No N/A RMK#___
- vi. The possible hazards to human health or the environment outside the facility? Yes___ No N/A RMK#___
- c. Did the permittee collect and manage as hazardous waste all liquid or solid material resulting from fire, explosion, released material or emergency response materials until such time as the permittee can demonstrate to Ohio EPA that such waste are not hazardous wastes? [Condition B.16] Yes___ No N/A RMK#___
- d. Within 15 days of the incident did the permittee submit to the director a written report of the incident? If so: Yes___ No N/A RMK#___
- I. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23] Yes___ No N/A RMK#___
- e. Did the permittee note in the operating record the time, date and details of any incident that required the implementation of the approved contingency plan as required by OAC rule 3745-54-56(J)? [Condition B.23] Yes___ No N/A RMK#___

INSPECTION ITEMS FROM THE PART B APPLICATION

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

REMARKS

CLOSURE REQUIREMENTS

- 1. Does the permittee maintain the approved closure plan at the facility? [Condition B.29] Yes No N/A ___ RMK# ___
- 2. Is the permittee keeping at the facility and submitting annually to Ohio EPA, the latest closure cost estimate as required by OAC rule 3745-55-42(D) [Condition B.36] Yes No N/A ___ RMK# ___
- 3. Has the permittee amended the closure plan? If so: Yes ___ No N/A RMK# ___
a. Has the plan been amended in accordance with OAC rule 3745-55-18(D)? [Condition B.28] Yes ___ No N/A ___ RMK# ___

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

- 4. Has the permittee closed the facility? If so: Yes ___ No N/A ___ RMK# ___
a. Did the permittee complete closure of the facility 180 days after receiving the final volume of hazardous waste, as required by Condition B.31 of the permit? Yes ___ No N/A RMK# ___
b. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26] Yes ___ No N/A RMK# ___
c. Did the permittee carry out the approved closure plan as set found in Section ___ of the approved permit application? [Condition B.27] Yes ___ No N/A RMK# ___
d. After receiving the final volume of hazardous waste, did the permittee remove all hazardous waste and complete closure activities in accordance with the schedule specified in the approved closure plan and as required by OAC rule 3745-55-13? [Condition B.31] Yes ___ No N/A RMK# ___

e. Has the permittee decontaminated and/or disposed of all facility equipment, structures and soils as required by OAC rule 3745-55-14 and the approved closure plan? [Condition B.32]

Yes___ No N/A RMK#___

f. Has the permittee certified that the facility has been closed in accordance with the specifications in the approved closure plan as required by OAC rule 3745-55-15? [Condition B.33]

Yes___ No N/A RMK#___

g. Has the permittee submitted a survey plat to the director and local zoning authority no later than the submission of certification of closure of each hazardous waste disposal unit? [Condition B.34]

Yes___ No N/A RMK#___

REMARKS

POST-CLOSURE MAINTENANCE

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

1. Has the permittee inspected the components, structures, and equipment at the site in accordance with the inspection schedule in §___ of the permit application on a quarterly basis? [OAC rule 3745-55-17(A)(1)(b)] [Condition B.35]

Yes No N/A ___ RMK#___

Make sure former hazardous waste tank farm dike is in good repair

2. Has the permittee conducted and recorded an inspection of at least the following? [Condition B.35]

Yes No N/A ___ RMK#___

- a. Security control devices (gates, locks, fences and signs);
- b. Erosion control;
- c. Cover settlement, subsidence and displacement;
- d. Vegetative cover conditions;
- e. Integrity of run-on/run-off control measures;
- f. Cover drainage system functioning;
- g. Monitor well conditions; and
- h. Benchmark integrity.

3. Is the permittee using the inspection forms found in the approved Part B permit application? [§____ of the approved permit application] Yes No N/A ____ RMK# ____
4. Have suitable repairs been made within a reasonable amount of time? [Condition B.35] Yes ____ No N/A RMK# ____
5. Have repairs been indicated on the Notification Repair Form? [Condition B.35] Yes ____ No N/A RMK# ____
6. Was the Notification of Repair Form submitted to Ohio EPA within one week after determining that repairs are necessary? [Condition B.35] Yes ____ No N/A RMK# ____

INSPECTION ITEMS FROM THE PART B APPLICATION

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

REMARKS

STORAGE OF HAZARDOUS WASTES IN CONTAINERS

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

CONDITION OF CONTAINERS

1. Are containers holding hazardous wastes in good condition as required by OAC 3745-55-71? [Condition C.4] If not:
- Yes No N/A ___ RMK# ___
- a. Did the permittee transfer the hazardous waste from such a container to one that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit? [Condition C.4]
- Yes ___ No N/A RMK# ___
2. Does the permittee ensure that all containers used at the facility are compatible with the hazardous waste to be stored in them as required by OAC rule 3745-55-72? [Condition C.5]
- Yes No N/A ___ RMK# ___
3. Does the permittee keep all containers closed during storage except when it is necessary to add or remove waste as required by OAC rule 3745-55-73? [Condition C.6(a)]
- Yes No N/A ___ RMK# ___
4. *violation 2*
Does the permittee store all containerized hazardous waste on the container storage containment system as described in Condition C.7 of the permit? [Condition C.7]
- Yes ___ No N/A ___ RMK# ___

INSPECTIONS

NOTE: Inspector may attach a container inspection checklist. If so, the attached document is referenced as Appendix _____.

5. Is the permittee inspecting the container area weekly in accordance with OAC rule 3745-55-74 and the approved inspection schedule in Section ___ of the Part B permit application to detect leaking containers and deterioration of containers and the containment system? [Condition C.9]
- Yes No N/A ___ RMK# ___
- a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken as required by OAC rule 3745-54-15(D)?
- Yes No N/A ___ RMK# ___

CONTAINMENT SYSTEM

6. Does the permittee maintain the containment system as described in the approved permit application, Section ____, including: [Condition C.7]
- Yes No N/A ____ RMK# ____
- a. Sufficient capacity to hold 10% of the total volume of containers or the volume of the largest container, whichever is greater.
- Yes No N/A ____ RMK# ____
- b. A system which is free of gaps and sufficiently impervious to contain leaks and spills?
- Yes No N/A ____ RMK# ____
7. Has the permittee had a spill or leak of wastes? If so:
- Yes No N/A ____ RMK# ____
- a. Was spilled or leaked waste removed in a timely manner? [Condition C.7(e)]
- Yes No N/A ____ RMK# ____

NOTE: *This time period is not to exceed 24 hours. [Condition C.7(e)]*

aisle SPACE

8. Is the permittee maintaining adequate aisle space to allow unobstructed movement of personnel and equipment in the event of an emergency as required by OAC rule 3745-54-35 and Condition B.12 of the permit?
- Yes No N/A ____ RMK# ____

INSPECTION ITEMS FROM THE PART B APPLICATION

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

REMARKS

LAND DISPOSAL RESTRICTION REQUIREMENTS

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

1. Does the permittee comply with all applicable regulations regarding land disposal prohibitions and restrictions as required by OAC Chapter 3745-270? Yes No N/A ___ RMK# ___
2. Does the permittee comply with the notification and certification requirements of OAC rule 3745-270-07(A)? Yes No N/A ___ RMK# ___
3. Does the permittee comply with the requirements of OAC rule 3745-270-03 and does not in any way dilute a restricted waste or treatment residue as a substitute for adequate treatment? Yes No N/A ___ RMK# ___
4. Does the permittee retain supporting data used to determine if wastes managed at the facility are restricted from land disposal in the facility files as required by OAC rule 3745-270-07(A)(5)?
 - a. Are copies of all notices, certifications, demonstrations, waste analysis and other documentation produced pursuant to OAC Chapter 3745-270 retained for a period of three years as required by OAC rule 3745-270-07(A)? Yes No N/A ___ RMK# ___
5. Is the permittee in compliance with the requirements of OAC rule 3745-270-50 regarding the storage of wastes restricted or prohibited from land disposal under OAC rule 3745-270-50? Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

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

REMARKS

CORRECTIVE ACTION

1. Has the permittee submitted the monthly progress report for all corrective action activities? (This report is due by the 15th of the month following the reporting period.)
[Condition _____]

Yes ___ No N/A RMK# _____

2. Has the permittee identified any new WMUs or releases at the facility? [Condition E.10]? If so:

Maintenance Well SW-3 had a statistically significant event
Yes No N/A _____ RMK# _____

a. Did the permittee follow the steps indicated in Conditions E.10(a) and (b) and E.11?

for 1,1-DCA
Yes ___ No N/A RMK# _____

INSPECTION ITEMS FROM THE PART B APPLICATION

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

REMARKS

LDR CHECKLIST

GENERAL 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 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 do not meet treatment standards? [3745-270-07(A)(1)]
- Yes No N/A RMK#

NOTE: *Wastes with EPA hazardous waste numbers K174 and K175 (chlorinated aliphatic wastes) have specific requirements in rule 3745-270-33. Waste with EPA hazardous waste numbers K176, K177 and K178 (inorganic chemical wastes) have specific requirements in rule 3745-270-36.*

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#

NOTE: *In other words, is combustion a legitimate treatment method.*

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]

Yes No N/A RMK#

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]

Yes No N/A RMK#

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#

REMARKS

NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)]
 Yes No N/A RMK#

14. 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 of 3745-270-07? [3745-270-07(A)(3)]
 Yes No N/A RMK#

15. 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 of 3745-270-07? [3745-270-07(A)(4)]
 Yes No N/A RMK#

16. 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 of 3745-270-07? [3745-270-07(A)(9)]
*Don't generate lab pack waste
 Broker it to another facility*
 Yes No N/A RMK#

17. 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))*

18. 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

Am treat waste as a permitted TSD

** See approved WAP in Part B Permit Application*

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)]
 - 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. Has the generator followed their WAP [3745-270-07(A)(5)]? Yes No N/A RMK#
- 5. 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.*

- 6. Has the generator sent a notification and certification with the initial shipment of waste? [3745-270-07(A)(5)(c)] *as a TSD - yes* Yes No N/A RMK#
- 7. 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#
- 8. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following:
 - a. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes No N/A RMK#
 - b. A description of the waste, including EPA hazardous waste codes 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.*

- 9. 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)]
- b. Has the director been notified of such changes? [3745-270-09(D)]

Yes ___ No N/A RMK# ___

Yes ___ No N/A RMK# ___

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

- 10. 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# ___

- 11. Does each notification/certification form completed, contain the information found in Table1? [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.*

REMARKS

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 3745-270-45? [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 from regulation as a hazardous waste under 3745-51-03(F)(1) maintain the following information?

Yes ___ No ___ N/A RMK# ___

- 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)(1) have the following information? [3745-270-07(D)(3)]

Yes ___ No ___ N/A RMK# ___

- 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# ___

REMARKS

Do Not treat to meet LDR.

TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS

1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-13? [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:
a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)]

5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? If so:

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 3745-270 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. The testing frequency specified in the facility's WAP and have they followed the protocol?
Yes ___ No N/A RMK# ___

REMARKS

HAZARDOUS WASTE TRANSPORTER REQUIREMENTS

REMARKS - GENERAL INFORMATION

Please provide a brief description of site activity/waste handling procedures:

1. Registration with Public Utilities Commission of Ohio [3745-53-11] Yes No N/A ___ RMK# ___
2. Has the transporter received a U.S. EPA ID number? [3745-53-11(B)] Yes No N/A ___ RMK# ___
3. All hazardous wastes accepted have been accompanied by a manifest? Yes No N/A ___ RMK# ___
 - a. If no, was the waste generated by a CESQG or by a SQG shipped under a reclamation agreement? [3745-53-20(H)(1)] Yes ___ No N/A ___ RMK# ___
4. The transporter has signed the manifest as required by 3745-53-20 and carried the manifest with the waste shipment? [3745-53-20(C)] Yes No N/A ___ RMK# ___
5. Manifests are retained for at least three years? [3745-53-22(A)] Yes No N/A ___ RMK# ___
6. The transporter has delivered the entire quantity of waste accepted from the generator in accordance with manifest instructions? Yes No N/A ___ RMK# ___
 - a. If not, did the transporter contact the generator for further instructions and revise the manifest accordingly? [3745-53-21(A)(B)] Yes No N/A ___ RMK# ___
7. **For hazardous waste delivered by the original transporter to a rail or water transporter:** Did the original transporter comply with the manifest handling requirements of 3745-53-20(E)(F)? Yes ___ No N/A RMK# ___
8. **For hazardous waste shipped out of the country:** Has the transporter retained signed copies of the manifest for at least three years indicating that the waste left the U.S.A.? [3745-53-22(D)] Yes ___ No N/A RMK# ___

11/16/06 discharge of non-haz. Leaking drum.
cleaned up

9. Has the transporter ever had a discharge of hazardous waste during the time that the waste was under the transporter's control? If so: Yes ___ No N/A ___ RMK# ___

a. Was immediate action taken? [3745-53-30(A)] Yes No N/A ___ RMK# ___

b. Was Ohio EPA's Office of Emergency Response immediately notified as required by 3745-53-30(C)(1)? Yes ___ No N/A RMK# ___

c. Did the transporter report in writing to Ohio EPA's Office of Emergency Response? [3745-53-30(C)(2)] Yes ___ No N/A RMK# ___

d. Was the discharge cleaned up as required by Ohio EPA or a federal agency to remove hazard to human health or the environment? [3745-53-31] Yes ___ No N/A RMK# ___

10. Does the transporter store manifested hazardous wastes in containers temporarily while wastes are in transit? If so: Yes No N/A ___ RMK# ___

for a few days or less

a. Are wastes stored for only ten days or less? Yes No N/A ___ RMK# ___

b. Do wastes remain properly DOT packaged during storage? [3745-53-12] Yes No N/A ___ RMK# ___

NOTE: Temporary storage in stationary tanks is not permitted under transfer facility requirements and such storage requires a RCRA permit and is subject to interim status requirements for storage facilities. Any type of storage by the transporter which is not specifically authorized under OAC 3745-53-12 transfer facility requirements is subject to full RCRA regulations.

A "transfer facility" means any transportation-related facility, including loading docks, parking areas, storage areas and other similar areas where hazardous waste is held during the normal course of transportation. (This does not include the designated facility.)

11. Does the transporter import hazardous waste into the United States? If so: Yes ___ No N/A ___ RMK# ___

a. Did the transporter comply with OAC Chapter 3745-52? [3745-53-10(C)(1)] Yes ___ No N/A RMK# ___

12. Does the transporter mix hazardous wastes of different U.S. DOT descriptions by placing them into a single container? If so:

Yes ___ No N/A RMK# ___

a. Did the transporter comply with OAC Chapter 3745-52? [3745-53-10(C)(2)]

Yes ___ No N/A RMK# ___

13. Does the transporter receive SQG wastes for transport pursuant to a reclamation agreement?

Yes ___ No N/A ___ RMK# ___

If so, was the following information recorded in a log or shipping paper carried with the shipment as required by 3745-53-20(H):

a. Name, address and U.S. EPA ID # of SQG?

Yes ___ No N/A RMK# ___

b. Quantity of waste?

Yes ___ No N/A RMK# ___

c. DOT required shipping information?

Yes ___ No N/A RMK# ___

d. Date waste was accepted?

Yes ___ No N/A RMK# ___

14. If the transporter receives SQG wastes for transport as described in Question No. 13, are records related to the shipments maintained for at least three years following expiration of the reclamation agreement? [3745-53-20(H)(4)]

Yes ___ No N/A RMK# ___

REMARKS

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

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.

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

Safety Equipment Used:

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A
2. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes No N/A
3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] Yes No N/A
4. Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] Yes No N/A
5. Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] Yes No N/A
6. Does the generator accumulate hazardous waste? Yes No N/A

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

7. Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02 (E) & (F)? Yes No N/A

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

8. Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]
 - a. Container that meets 3745-66-70 to 3745-66-77? Yes No N/A
 - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97 (C) and *Treat in a permitted tank* Yes No N/A
 - c. Drip pads that meet 3745-69-40 to 3745-69-45? Yes No N/A
 - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No N/A

NOTE: Complete appropriate checklist for each unit.

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

9. Does the generator export hazardous waste? If so: Yes No N/A
 - a. Has the generator notified U.S. EPA of export activity? [3745-52-53(A)] Yes No N/A
 - b. Has the generator complied with special manifest requirements? [3745-52-54] Yes No N/A
 - c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] Yes No N/A

d. Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes No N/A

e. Are export related documents being maintained on-site? [3745-52-57(A)] Yes No N/A

MANIFEST REQUIREMENTS

10. 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

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

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]

12. Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)] Yes No N/A

NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]

13. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes No N/A

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

NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity of the waste they generate.

15. If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Yes No N/A

16. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes No N/A

17. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes No N/A

NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.

PERSONNEL TRAINING

18. 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
Need to include the Permit.

19. Does the personnel training program include instructions to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] Yes No N/A

20. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes No N/A

21. 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

22. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No N/A

23. Does the generator keep records including: job titles [D(1)], job descriptions [D(2)], type and amount of training given to each person [D(3)] and documentation of completed training or job experience required [D(4)]? [3745-65-16(D)] Yes No N/A

24. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes No N/A

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

Job Performed	Name of Employee	Date Trained

CONTINGENCY PLAN

25. Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes No N/A

26. Does the plan describe the following:

a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste [3745-65-52(A)]? Yes No N/A

b. Arrangements with emergency authorities [3745-65-52(C)]. Yes No N/A

c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)] Yes No N/A *CI submitted*

d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)] Yes No N/A

e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)] Yes No N/A

NOTE: If the facility already has a "Spill Prevention, Control and 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)]

27. 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

28. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] Yes No N/A *New Emergency Coordinator*

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

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

EMERGENCY PROCEDURES

30. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes No N/A

a. Was the contingency plan implemented? [3745-65-51(B)] Yes No N/A

b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes No N/A

c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes No N/A

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

PREPAREDNESS AND PREVENTION

31. 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

32. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:

a. Internal alarm system? [3745-65-32(A)] *Fire alarm* Yes No N/A

b. Emergency communication device? [3745-65-32(B)] Yes No N/A

c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes No N/A

d. Water of adequate volume/pressure? [3745-65-32(D)] Yes No N/A

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

33. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes No N/A

34. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes No N/A

35. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] Yes No N/A

36. 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 No N/A

37. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes No N/A

38. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes No N/A

39. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes No N/A

SATELLITE ACCUMULATION AREA REQUIREMENTS

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

a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes No N/A

b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes No N/A

c. Do not exceed one quart of acutely hazardous waste at anyone time? [3745-52-34(C)(1)] Yes No N/A

d. Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)] Yes No N/A

e. Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)] Yes No N/A

41. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so: Yes No N/A

a. Did the generator comply with 3745-52-34(A)(1)through(4) or other applicable generator requirements within three days? [3745-52-34(C)(2)] Yes No N/A

b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)] Yes No N/A

c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes No N/A

NOTE: *The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less 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

42. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes No N/A

43. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes No N/A

44. Are hazardous wastes stored in containers which are:

a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes No N/A

b. In good condition? [3745-66-71] Yes No N/A

c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A

d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes No N/A

NOTE: Record location on process summary sheets and photograph the area.

45. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORCS 1.44(A) "Week" means seven 7 consecutive days. Yes No N/A

a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A

46. Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes No N/A

47. Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)] Yes No N/A → space

48. If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)] Yes No N/A

49. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] Yes No N/A

NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

50. If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] Yes No N/A

NOTE: Please provide a description of the unit and documentation provided by the generator 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 - generator is also a transporter

51. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)] Yes No N/A

52. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A

53. 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

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

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 BATTERIES

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes ___ No N/A RMK# ___
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes No N/A ___ RMK# ___
Saw 1 box of batteries
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes ___ No N/A ___ RMK# ___
- b. Mix battery types in one container? Yes ___ No N/A ___ RMK# ___
- c. Discharge batteries to remove the electric charge? Yes ___ No N/A ___ RMK# ___
- d. Regenerated used batteries? Yes ___ No N/A ___ RMK# ___
- e. Disassemble them into individual batteries or cells? Yes ___ No N/A ___ RMK# ___
- f. Remove batteries from consumer products? Yes ___ No N/A ___ RMK# ___
- g. Remove the electrolyte from the battery? Yes ___ No N/A ___ RMK# ___

If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)]

Yes No N/A RMK#

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)]

Yes No N/A RMK#

a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]

Yes No N/A RMK#

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]

Yes No N/A RMK#

7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]

Yes No N/A RMK#

UNIVERSAL WASTE PESTICIDES

Did not see any.

8. Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)]

Yes No N/A RMK#

9. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]

Yes No N/A RMK#

10. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97; 3745-66-100 and -66-101 of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]

Yes No N/A RMK#

11. If pesticides are stored in a transport vehicle, is it closed, structurally sound and compatible with the pesticide(s)? [3745-273-13(B)(4)]

Yes No N/A RMK#

12. Are containers, tanks, or transport vehicles that contain universal waste pesticides, labeled with either "Universal Waste Pesticides" or "Waste Pesticides"? [3745-273-14(B)]

Yes No N/A RMK#

UNIVERSAL WASTE THERMOSTATS

Did not see any

13. Are thermostats that show evidence of leaking, spilling, or damage that could cause leaks, properly contained? [3745-273-13(C)(1)] Yes ___ No N/A RMK# ___
14. If the thermostats are contained, are the containers closed, structurally sound, compatible with contents of the thermostats and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(C)(1)] Yes ___ No N/A RMK# ___
15. If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]
- a. Remove the ampules in a manner to prevent breakage and are they removed over or in a containment device? [3745-273-13(C)(2)(a)(b)] Yes ___ No N/A RMK# ___
- b. Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)(d)] Yes ___ No N/A RMK# ___
- c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)] Yes ___ No N/A RMK# ___
- d. Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)] Yes ___ No N/A RMK# ___
- e. Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)] Yes ___ No N/A RMK# ___
- f. Pack removed ampules in containers with packing material to prevent breaking during storage, handling and transportation? [3745-273-13(C)(2)(h)] Yes ___ No N/A RMK# ___
16. If mercury, clean-up residues, or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-13(C)(3)(a)] Yes ___ No N/A RMK# ___

a. If the waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to Chapter 3745-52.) [3745-273-13]

Yes ___ No N/A RMK# ___

b. If the mercury, residues and/or other wastes are not hazardous, are they managed in compliance with applicable law? [3745-273-13(C)(3)(c)]

Yes ___ No N/A RMK# ___

17. Are thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)?" [3745-273-14(D)]

Yes ___ No N/A RMK# ___

UNIVERSAL WASTE LAMPS

18. 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# ___

19. 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# ___

20. 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# ___

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

21. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes No ___ N/A ___ RMK# ___
- 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 N/A RMK# ___

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

22. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)] Yes No N/A ___ RMK# ___
- 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 ___ N/A ___ RMK# ___
- 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 ___ N/A ___ RMK# ___
- 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 ___ N/A ___ RMK# ___
- 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 ___ N/A ___ RMK# ___
- 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 ___ N/A ___ RMK# ___
- 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 ___ N/A ___ RMK# ___

EMPLOYEE TRAINING

23. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] Yes No N/A RMK#

RESPONSE TO RELEASES

24. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes No N/A RMK#
25. Is the material released characterized? [3745-273-17(B)] Yes No N/A RMK#
26. 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 N/A RMK#

OFF-SITE SHIPMENTS

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

27. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] Yes No N/A RMK#

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

28. 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 N/A RMK#
29. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes No N/A RMK#
30. 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 N/A RMK#

b. Agree to where the shipment will be sent? [3745-273-18(E)(2)]

Yes ___ No ___ N/A RMK# ___

31. 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:

Yes ___ No N/A RMK# ___

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# ___

33. 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# ___

34. 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

35. 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



Department:



DMWM

Locked to DMWM

Subdepartment:



DMWM-Hazardous Waste

Office Location:



NEDO

Locked to NEDO

Media:



LAND

Locked to LAND

Doc Type:



RTC

Doc Subtype:



<NONE>

Program:



<NONE>

County:



18 - CUYAHOGA

(Auto Load)

<NONE>

(Override)

Facility ID:



OHD001926740

Facility Name:



HUKILL ENVIRONMENTAL SERVICES

(Auto Load) input is 29 characters long.

(Override) input is 0 characters long.



2/2/2007

Record ID:





State of Ohio Environmental Protection Agency



Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 467-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

February 2, 2007

RE: HUKILL CHEMICAL CORPORATION
OHD001926740/02-18-0315
CUYAHOGA COUNTY
RETURN TO COMPLIANCE

Mr. Tim Jones
EH&S Manager
Hukill Chemical Corporation
7013 Krick Road
Bedford, OH 44146

Dear Mr. Jones:

Ohio EPA is in receipt of your correspondence dated January 24, 2007. The letter and its attachments were submitted in response to Ohio EPA's January 9, 2007 notice of violation letter related to the ground water field inspection.

Based upon Ohio EPA's review of your submittal, Hukill Chemical has returned to compliance with the violations noted in Ohio EPA's January 9, 2007 notice of violation letter.

1. OAC Rule 3745-54-97 (D): Custom engraved tags were installed on each well for visible well identification.
2. OAC Rule 3745-54-97 (C): A manhole cover was installed on Well F to protect the well casing from damage and to prevent surface runoff from entering the well vault.

If you have any questions or comments, please call me at (330) 963-1162.

Sincerely,

Marlene M. Kirney
Environmental Specialist
Division of Hazardous Waste Management

MMK:ddw

ec: Rich Kurlich, DDAGW, NEDO
Natalie Oryshkewych, DHWM, NEDO