OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office

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

June 25, 2008

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

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

Dear Mr. Jones:

On June 12, 2008, I conducted a compliance evaluation inspection at Hukill Chemical Corporation (HCC), located at 7013 Krick Road, 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 and Jeff McGlynn and Ohio EPA was represented by me.

This inspection included a facility walk through, review of outbound manifests and LDR forms, weekly and daily inspection checklists, waste data sheets, the daily drum inventory log, the daily bulk solvent inventory sheet, and personnel training files for the new employees.

I have enclosed copies of the inspection checklists for your records and copies of the photographs that I took. During the inspection, I found the following violations of Ohio's hazardous waste laws:

1. **Permit Condition C.1(a). The Permittee may not store containers for greater than one year in the container storage room.**

During my review of the June 12, 2008 Drum Inventory log, I noted that there was a drum of hazardous waste that had been in the container storage room for greater than 1 year, in violation of this permit condition.

On June 23, 2008, I received documentation demonstrating that the drum was processed through the auger to Tank 14 on June 19, 2008. **This violation has been abated and no further information is requested.**

2. **Ohio Administrative Code (OAC) 3745-273-13(D)(1); Standards for universal waste lamps, failure to store lamps in a closed container.**

Two cardboard boxes containing universal waste lamps were not closed. One box looked like the flaps at the end of the box had been torn off and broken lamps were noted below the box. The second box had a rectangular hole cut into the end of the box. **This violation was abated during the inspection when the boxes were taped shut. No further information is requested.**

3. **OAC 3745-273-13(D)(2); Standards for universal waste lamps, failure to clean up broken lamp; and,**

4. **OAC 3745-273-17(A); Response to releases-standards for small quantity handlers of universal waste.**

A small quantity handler of universal waste must immediately contain all releases of universal wastes and other residues from universal wastes.

I noted broken bulbs on the floor below a cardboard container of lamps that was not closed. **This violation was abated during the inspection when the broken lamps were cleaned up and the box was properly taped shut. No further information is requested.**

Concern

A requirement for all large quantity generators and permitted hazardous waste facilities is to have job titles and job descriptions for all personnel who handle hazardous waste. Hukill has the necessary paperwork. However, Section H of the facility part B permit application, Personnel Training, page 5 states:

Hukill maintains a master training file with employee roster. Also, for each employee at Hukill Chemical, a folder is placed in an employee training file. The folder contains: a position description enumerating the job title, essential duties and responsibilities and education/experience requirements.

The essential duties (job description) was absent from the training files created for 5 of the newer employees. Per your June 16, 2008 email, the training folders have been updated. No response to the concern is necessary.

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

Marlene M. Kinney
Environmental Specialist
Division of Hazardous Waste Management

MMK:ddw

Enclosures

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

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PROCESS DESCRIPTION SECTION

Give a general process description (include all processes at the facility)

Facility is a permitted hazardous waste treatment and storage facility. HCC generated waste streams are from still bottoms and plant clean up wastes generated from processing hazardous waste.

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WASTE ACTIVITIES AND P2 SUMMARY SECTION

For each of the processes listed above that generate a waste give the following information: (1) name of process generating waste, (2) name or description of waste generated (e.g. sludge, solvent, ash, used oil, spent lamps, etc.), (3) EPA waste codes, if applicable, (4) quantity generated per month, (5) type of accumulation (container, tank, etc.) (6) waste accumulation location in facility, (7) type of on-site treatment (if used), (8) name of off-site management facility and type of waste management activity occurring there, (9) Current P2 activities, and (10) P2 opportunities.

Hazardous Waste solids — Ross Incineration ~1 load/week
M&M

HW Fuel — Ross, Systech, Keystone, Lonestar
at least 1 tanker / per week

Hazardous Water — Systech or Ross

Non hazardous Water — GEM

Scrap Metal — Weingold

Pallets — go for scrap or are refurbished

Empty totes — C.C.C. or K.P. McNamara } Cleave OH

Universal Waste acids & caustics — EET Cincinnati, OH

UW; E waste — Environmental Recycling Bowling Green, OH

REMARKS–GENERAL INFORMATION

Regulatory/Enforcement History (if applicable):

Facility is a permitted hazardous waste treatment and storage facility engaged in solvent recycling and fuel blending activities.

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes*____No X*
If yes, refer promptly to your district P2 coordinator. Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other:

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

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

GENERAL REQUIREMENTS

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

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

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

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

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

NOTE: Complete appropriate checklist for each unit.
NOTE: If waste is treated to meet LDRs, use LDR checklist.

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

MANIFEST REQUIREMENTS

12. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] — Yes ☑ No ☐ N/A ☐
13. 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)]

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

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

15. If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] — Yes ☑ No ☐ N/A ☐
16. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1) & (2)] — Yes ☑ No ☐ N/A ☐

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

17. If the generator 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 ☑
18. If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] — Yes ☐ No ☐ N/A ☑
19. 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

20. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] — Yes ☑ No ☐ N/A ☐
21. Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)] — Yes ☑ No ☐ N/A ☐
22. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] — Yes ☑ No ☐ N/A ☐
23. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] — Yes ☑ No ☐ N/A ☐
24. Does the generator provide annual refresher training to employees? [3745-65-16(C)] — Yes ☑ No ☐ N/A ☐
25. Does the generator keep records and documentation of:
    a. Job titles [3745-65-16D(1)]? — Yes ☑ No ☐ N/A ☐
    b. Job descriptions [3745-65-16D(2)]? — Yes ☑ No ☐ N/A ☐
    c. Type and amount of training given to each person[3745-65-16D(3)]? — Yes ☑ No ☐ N/A ☐
    d. Completed training or job experience required [3745-65-16D(4)]? — Yes ☑ No ☐ N/A ☐
26. Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] — Yes ☑ 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
All employees are required to attend the yearly refresher training		

CONTINGENCY PLAN

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

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

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

29. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53 (A) & (B)] Yes ☑ No ☐ N/A ☐
30. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54] Yes ☑ No ☐ N/A ☐
31. 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 throughly 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 - Flash Fire in Hochmeyer 3/21/2008

32. 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

33. 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 ☐
34. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:
    a. Internal communications or alarm system? [3745-65-32(A)] Yes ☑ No ☐ N/A ☐
    b. Emergency communication device? [3745-65-32(B)] Yes ☑ No ☐ N/A ☐
    c. Portable fire control, spill control and decon equipment? [3745-65-32(C)] Yes ☑ No ☐ N/A ☐
    d. Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)] Yes ☑ No ☐ N/A ☐

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

35. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes ☑ No ☐ N/A ☐
36. Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] Yes ☑ No ☐ N/A ☐
37. Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)] Yes ☑ No ☐ N/A ☐
38. 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 ☐
39. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes ☑ No ☐ N/A ☐
40. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)] Yes ☑ No ☐ N/A ☐
41. 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

42. Does the generator ensure that satellite accumulation area(s):
    a. Are at or near a point of generation? [3745-52-34(C)(1)] Yes ☑ No ☐ N/A ☐
    b. Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Yes ☑ No ☐ N/A ☐
    c. Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)] Yes ☑ No ☐ N/A ☐

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

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

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

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

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

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

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

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

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

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

Located in Process room.

46. Are hazardous wastes stored in containers which are:

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

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

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

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

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

47. Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days. Yes ☑ No ☐ N/A ☐

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

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

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

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

51. If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)] Yes ☐ 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.

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

NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

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

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

55. 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 ☐

GENERATOR LDR CHECKLIST
DOES NOT APPLY TO CESQGS

GENERAL REQUIREMENTS			
1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07 (A)(7)]		Yes ☑ No ☐ N/A ☐
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] Berm soil removal		Yes ☑ No ☐ N/A ☐ <LDR
NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07 (A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).			
3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]		Yes ☑ No ☐ N/A ☐
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]		Yes ☑ No ☐ N/A ☐
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,		Yes ☑ No ☐ N/A ☐
	a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)	Yes ☑ No ☐ N/A ☐
FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.			
6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]		Yes ☑ No ☐ N/A ☐
NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.			
NOTE: Written documentation of this determination is not required.			
7.	Did the generator treat his HW /soil on-site to meet the LDR treatment standard?		Yes ☐ No ☑ N/A ☐
NOTE If "Yes" see question #16. every time			
8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility?[3745-270-07(A)(2)]		Yes ☑ No ☐ N/A ☐
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]		Yes ☑ No ☐ N/A ☐
10.	Does the generator have a copy of the LDR notification form on file?[3745-270-07(A)(2)]		Yes ☑ No ☐ N/A ☐
	a.	Is the form kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes ☑ No ☐ N/A ☐
NOTIFICATION FORM			
11.	Does the LDR Notification form contain the following information:		
	a.	Manifest number of the first waste shipment to the TSD?[3745-270-07(A)(2)]	Yes ☑ No ☐ N/A ☐
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes ☑ No ☐ N/A ☐
	c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes ☑ No ☐ N/A ☐
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)].	Yes ☑ No ☐ N/A ☐

NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.				
	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]		Yes ☑ No ☐ N/A ☐
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories				
	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]		Yes ☑ No ☐ N/A ☐
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.				
	g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for?[3745-270-07(A)(2)]		Yes ☑ No ☐ N/A ☐
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.				
PROHIBITED DILUTION				
12.	Is the HW treated by burning? If "No," go to #15.			Yes ☑ No ☐ N/A ☐
13.	Is the HW a metal-bearing HW?			Yes ☑ No ☐ N/A ☐
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.				
14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless **one** of the following conditions apply. [3745-270-03(c)]		
		i.	Contains > 1% TOC?	Yes ☑ No ☐ N/A ☐
		ii.	Contains organic constituents or cyanide at levels greater than the UST levels?	Yes ☐ No ☐ N/A ☐
		iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes ☐ No ☐ N/A ☐
		iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes ☑ No ☐ N/A ☐
		v.	Co-generated with a HW that must be combusted?	Yes ☐ No ☐ N/A ☐
	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?		Yes ☐ No ☑ N/A ☐
15.	Was the HW treated by wastewater treatment?			Yes ☐ No ☑ N/A ☐
	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]		Yes ☐ No ☑ N/A ☑
NOTE: If Yes, HW is improperly being treated by dilution.				
	b.	Does the waste carry the D001 code <u>and</u> contain ≥10% TOC?		Yes ☐ No ☐ N/A ☑
	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?		Yes ☐ No ☐ N/A ☑
NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B) and 3745-270-40(A)(3)].				
NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.				

GENERATOR TREATMENT					
16.	Does the generator treat to meet LDRs on-site [3745-270-40(A)]?				Yes ☐ No ☑ N/A ☐
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?				Yes ☐ No ☑ N/A ☐
	If "Yes"...complete the rest of the checklist. If "No"...stop...you are done.				
	a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]			Yes ☐ No ☐ N/A ☐
	b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]			Yes ☐ No ☐ N/A ☐
NOTE: This is a laboratory analysis but it does not have to be kept by the generator.					
	c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]			Yes ☐ No ☐ N/A ☐
	d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]			Yes ☐ No ☐ N/A ☐
	e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]			Yes ☐ No ☐ N/A ☐
	f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]			Yes ☐ No ☐ N/A ☐
NOTIFICATION FORM					
17.	a.	Contains all information in #11 a-g above and			Yes ☐ No ☐ N/A ☐
	b.	If the treated HW/soil is listed.....notification contains the following certification statement: " I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or trough knowledge of the waste, to support this certification that the waste complies with the treatment stands specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."			Yes ☐ No ☐ N/A ☐
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:			
		i.	Send a one-time notification to the director?[3745-270- 09 (D)]		Yes ☐ No ☐ N/A ☐
		ii.	Maintain a copy of the notice onsite?[3745-270-09(D)]		Yes ☐ No ☐ N/A ☐
		iii.	Include in the notification: [3745-270-09(D)(1)(a)]		
			1.	Name & address of receiving landfill?	Yes ☐ No ☐ N/A ☐
			2.	Description of HW when generated?	Yes ☐ No ☐ N/A ☐
			3.	HW code when generated?	Yes ☐ No ☐ N/A ☐
			4.	Treatability group when generated?	Yes ☐ No ☐ N/A ☐
			5.	Underlying hazardous constituents present when generated?	Yes ☐ No ☐ N/A ☐
		iv.	Contain the right certification statement as required by 3745-70-07(b)(4)?		Yes ☐ No ☐ N/A ☐

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] — Yes ☐ No ✓ N/A ___ RMK#___

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

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE 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#___

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 LAMPS

8. 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#___

9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273- — Yes __ No ☑ N/A ___ RMK#___

13(D)(2)]

10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)] Yes ✓ 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

11. 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.***

12. 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

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

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] — Yes ___ No ☑ N/A ___RMK#___

15. Is the material released characterized? [3745-273-17(B)] — Yes ✓ No ☐ N/A ___RMK#___

16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)] — Yes ___ No ☐ N/A ✓ RMK#___

OFF-SITE SHIPMENTS

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

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)] — Yes ✓ No ☐ N/A ___RMK#___

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

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)] — Yes ✓ No ☐ N/A ___RMK#___

19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] — Yes ✓ No ☐ N/A ___RMK#___

20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do <u>one of the following</u>:

    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# ___ 21.

If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:

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#___

22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] — Yes ___ No ❑ N/A ✓ RMK#___

23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] — Yes ___ No ❑ N/A ✓ RMK#___

EXPORTS

24. 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

OHIO PART B PERMITTED FACILITY
RCRA INSPECTION CHECKLIST

Facility: Hukill Chemical Corporation Ohio Permit: 02-18-0315

Address: 7013 Krick Rd. U.S. EPA ID: OHD 001 926 740
Bedford OH 44146 Phone: 440-232-9400

County: Cuyahoga

Inspection Date: 6/12/08 Time: _____

Was advance notice of the inspection given? _____ YES ✓ NO
If so, how far in advance? _____

	Name	Agency/Title	Phone
Inspectors:	Marlene Kinney	Ohio EPA/NEDO/DHWM	330-963-1162
Facility Reps:	Tim Jones	EH&S Manager / Hukill	440-232-9400 (1123)

Is facility operating as a generator? ✓ YES _____ NO

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

PERMIT STATUS

Permit Issued: 12/28/2006 LDR Checklist Attached: ☑ Yes ☐ No
Permit Effective Date: 12/28/2006 Used Oil Checklist Attached: ☐ Yes ☑ No
Permit Expiration Date: 12/28/2016 Generator Checklist Attached: ☑ Yes ☐ No

Permit Renewal Date: _____

Permit Modification Date(s): _____

AUTHORIZED ACTIVITIES

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

☑ Post-Closure Care ☑ Corrective Action

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GENERAL PERMIT COMPLIANCE AND ACTIVITIES

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#___

4. 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#___

Has the permit, been transferred to a new owner/operator? If so:

Yes✓ No___ N/A___ RMK#___

11.

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#___

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#___
g.	Operating record in accordance with OAC rule 3745-54-73? [Condition B.22]	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 #___

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

Yes___ No___ N/A✓ RMK#___

4.

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#___

2. Did the permittee submit the waste minimization report to Ohio EPA, Office of Pollution Prevention and _____ 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_ **If so,** what amount of waste has the permittee reduced this year? _____

No✓

N/A_

RMK #___

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? 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 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 #___

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#___

6.

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©)]? — 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:

   !. 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), ©) and (D)? [Condition B.5]

Yes ✓ No ☐ N/A RMK #___

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#___

2.

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©)? [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_ d. Adequate laboratory and process controls? Yes ✓ No☐ N/A ___ RMK#___

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

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 #___

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#___

4.

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©)]

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#___

in auger

Flash fire which caused CO_2 system to engage. Flash immediately suppressed

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☐ and N/A✓ RMK#___

Implemented emergency procedures.

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#___

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

No

☐

N/A

RMK

#___

2.

3. Does the permittee comply with the requirements of OAC rule 3745-270-03 and does not in any way dilute a restricted waste or treatment residue as a substitute for adequate treatment? Yes ✓ No☐ N/A ___ RMK#___

4. Does the permittee retain supporting data used to determine if wastes managed at the facility are restricted from land disposal in the facility files as required by OAC rule 3745-270-07(A)(5)? Yes ✓ No☐ N/A ___ RMK#___

   a. Are copies of all notices, certifications, demonstrations, waste analysis and other documentation produced pursuant to OAC Chapter 3745-270 retained for a period of three years as required by OAC rule 3745-270-07(A)? Yes ✓ No☐ N/A ___ RMK#___

5. Is the permittee in compliance with the requirements of OAC rule 3745-270-50 regarding the storage of wastes restricted or prohibited from land disposal under OAC rule 3745-270-50? Yes___ No☐ N/A ✓ RMK#___

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: Yes___ No☑ N/A ✓ RMK#___

Have not been required to submit monthly progress reports

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