



State of Ohio Environmental Protection Agency

Northeast District Office



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

May 28, 2008

Dennis Woodard
EHS & S Manager
Gabriel Performance Products, LLC
425 State Road
P.O. Box 488
Ashtabula, OH 44005-0488

**RE: GABRIEL PERFORMANCE PRODUCTS, OHD003913308, PERMIT # 02-04-0078,
ASHTABULA COUNTY, LQG/TSD CEI NOV/PRTC**

Dear Mr. Woodard:

On May 22, 2008, Sherry Slone and this writer, representing Ohio EPA, Division of Hazardous Waste Management (DHWM), visited Gabriel Performance Products, LLC (Gabriel) to conduct a hazardous waste compliance evaluation inspection. Gabriel was represented by Ms. Stacy Racut and you. The purpose of this inspection was to determine Gabriel's compliance with Ohio's hazardous waste laws as found under Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC), as well as, Gabriel's hazardous waste facility installation and operation permit. Gabriel was inspected for compliance with the requirements of the hazardous waste facility installation and operation permit and as a large quantity generator (LQG) of hazardous waste.

On May 23 and May 28, 2008, I received your e-mails concerning the submittal of inspection related information.

Enclosed, please find a copy of the inspection checklists. Based on the inspection, Ohio EPA has determined that Gabriel has violated the following Ohio hazardous waste laws:

1. ORC § 3734.02 (F) Causing A Hazardous Waste To Be Transported To An Unpermitted Facility: Based on a records review by Ohio EPA, on August 17, 2007 and April 18, 2008, Gabriel caused hazardous waste to be transported to Vexor Technology, Inc. (Vexor Technology) in Medina, Ohio. Specifically, the August 17, 2007 shipment consisted of four, 55-gallon drums which were later determined to be a D001/F005 hazardous waste, while the April 18, 2008 shipment consisted of one, 55-gallon drum which was later determined to be a D001 hazardous waste.

Gabriel violated ORC §3734.02 (F) which states in part that no person shall dispose of or cause to be transported, hazardous waste, except at or to, a permitted hazardous waste facility. Vexor Technology is not a permitted hazardous waste facility.

Additionally, Gabriel violated OAC rule 3745-52-11 (Waste Evaluation); OAC rule 3745-52-20 through OAC rule 3745-52-23 (Manifest Use); OAC rule 3745-52-31 and OAC rule 3745-52-32 (Labeling and Marking Containers of Hazardous Waste); and OAC rule 3745-270-07 (Land Disposal Restriction Requirements) since these regulations were not complied with when the waste was initially shipped.

To demonstrate efforts towards abating this violation, Gabriel must identify the disposition of the rejected waste shipments and provide instruction to all affected employees on the adequate evaluation of all wastes. This instruction must be included as part of the facility's personnel training program required under OAC rule 3745-65-16. Identify in writing how Gabriel will prevent a recurrence of this violation, as well as submit documentation concerning the training provided to all affected employees.

2. OAC rule 3745-52-11, Waste Evaluation and OAC rule 3745-3745-270-07(A)(1)(2), Land Disposal Restriction (LDR) Requirements: (A)(1) A generator of a hazardous waste must determine if the waste has to be treated before it can be land disposed. (2) With the initial shipment of waste to each treatment or storage facility, the generator must send a one-time written notice and place a copy in the generator's files. The notice must include the information in Table 1, Column A of this rule.

Gabriel failed to adequately evaluate the hazardous waste appearing on manifest tracking number 00019355323JJK, dated May 22, 2007. The hazardous waste was initially shipped as D001/D038/F003/F005. However, upon receipt by the designated facility, the hazardous waste was found to be D001/D002/D038/F003/F005. To abate this violation, Gabriel must provide instruction to all affected employees on the adequate evaluation of all wastes. This instruction must be included as part of the facility's personnel training program required under OAC rule 3745-65-16. Identify in writing how Gabriel will prevent a recurrence of this violation, as well as submit documentation concerning the training provided to all affected employees.

3. OAC rule 3745-273-14(A)(E); Labeling/marketing Standards for Small Quantity Handlers of Universal Waste: A small quantity handler of universal waste must label or mark the universal waste to identify the type of universal waste as specified in this rule. (A) Universal waste batteries or a container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: "universal waste - battery(ies)," or "waste battery(ies)," or "used battery(ies)." (E) Universal waste lamps must be labeled/marked with one of the following phrases: "universal waste lamp(s)," or "waste lamp(s)" or "used lamp(s)."

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Gabriel failed to label/mark universal waste batteries and lamps with the words required by this rule. During the inspection, Gabriel labeled/marked the universal waste batteries and lamps with the words required by this rule. Please identify in writing how Gabriel will prevent a recurrence of this violation.

4. OAC rule 3745-279-22(C), Used Oil Storage Requirements: Generators must store used oil in containers that are labeled with the words "Used Oil."

Gabriel failed to label one, 55-gallon drum, observed in the Boiler House, with the words "Used Oil." During the inspection, Gabriel labeled/marked the drum with the words "Used Oil." Please identify in writing how Gabriel will prevent a recurrence of this violation.

5. Permit Condition B.6 and OAC rule 3745-54-16(C), Personnel Training: (A) Facility personnel shall successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the hazardous waste regulations. The program shall be directed by a person trained in hazardous waste management procedures, and shall include instruction which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to the positions in which they are employed. (C) Facility personnel shall take part in an annual review of this program.

Gabriel failed to provide annual refresher training to one employee (William Brennehan) as required by permit condition B.6. On May 23, 2008, Gabriel provided annual refresher training to this employee. **Based on submitted documentation, Gabriel has adequately abated this violation. No further information is requested.**

Ohio EPA has the following comments regarding the facility:

6. Please identify in writing how Gabriel will ensure hazardous waste that is initially accumulated in a container and subsequently placed into a tank is shipped off-site within 90 days of generation.
7. Ohio EPA has created an electronic news service to provide facilities with quick and timely updates on news and events related to hazardous waste activities in Ohio. For more information, please refer to: <http://www.epa.state.oh.us/dhwm/listserv.html>
8. You may be able to reduce the amount of waste your facility generates by finding ways to recycle, reduce, or eliminate it. Ohio EPA's Office of Compliance

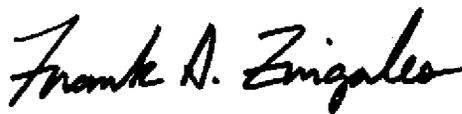
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Assistance and Pollution Prevention (OCAPP) provides free compliance and pollution prevention assistance on environmental issues related to air, land, and water. Should your facility be interested in receiving a free pollution prevention assessment in the future, please contact me or OCAPP. OCAPP may be contacted at (800) 329-7518 or via the internet at:
<http://www.epa.state.oh.us/ocapp/ocapp.html>

Please send all of the above requested documentation to the attention of the undersigned at the Ohio EPA within 30 days of receipt of this letter. Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve Gabriel from having to comply with all applicable regulations.

Should you have any questions, please contact me at (330) 963-1108.

Sincerely,



Frank A. Zingales
Environmental Specialist
Division of Hazardous Waste Management

FAZ:ddw

Enclosure

cc: Natalie Oryshkewych, NEDO, DHWM
Harry Sarvis, CO, DHWM

E-mail this completed form to tammv.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office

**Ohio Environmental Protection Agency
RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

2. Site EPA ID No. EPA ID Number: OHD003913308

3. Site Name Name: Gabriel Performance Products, LLC Website (optional):

4. Site Location Information
 Street Address: 425 State Road
 City, Town, or Village: Ashtabula State: OH
 County Name: Ashtabula Zip Code: 44005

5. Site Land Type (check only one)

Private	County	District	Federal	Indian	Municipal	State	Other
<input type="checkbox"/>							

6. NAICS code(s) www.census.gov/epcd/www/naics.html

A.	B.
C.	D.

7. Facility Representative:
 Additional names can be recorded in number 12.
 Only provide address information if it is different than the site address.

First Name: Dennis MI: Last Name: Woodard
 Phone Number: 440-992-3225 Phone Number Extension:
 E-Mail Address: Dennis_Woodard@gabepro.com
 Fax Number: 440-992-3204 Fax Number Extension:
 Street or P.O. Box: P.O. Box 488
 City, Town or Village: Ashtabula
 State: OH Country: Zip Code: 44005

8. Legal Owner and Operator of the Site
 List Additional Owners and/or Operators in this section
 Comment Section or on another copy of this form page.

A. Name of Site's Legal Owner: Date Became Owner (mm/dd/yyyy):

Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Street or P.O. Box:
 City, Town, or Village: Owner Phone #:
 State: Country: Zip Code:

B. Name of Site's Operator: Date Became Operator (mm/dd/yyyy):

Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Street or P.O. Box:
 City, Town, or Village: Operator Phone #:
 State: Country: Zip Code:

9. Violations Cited? Yes No

10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)

Not Regulated

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

Facility: Gabriel Performance Products, LLC is the owner and operator of the facility for purposes of the Permit.

Occidental Chemical Company is co-operator for purposes of Corrective Action obligations in the Permit.

Address: 725 State Road
Ashtabula, Ohio 44004

County: Ashtabula

EPA ID: OHD 003 913 308

Ohio ID: 02-04-0078

Facility Phone: (440) 992-3200

Inspection Date: May 22, 2008

Time: 0935 - 1405

Advance notice of inspection given? No
If so, how far in advance? _____

	Name	Agency/Title	Phone
OEPA Rep(s):	Frank Zingales Sherry Slone	Ohio EPA/NEDO/DHWM Ohio EPA/NEDO/DHWM	(330) 963-1108
Facility Rep(s):	Dennis Woodard	Gabriel, EHS & S Mgr.	(440) 992-3225

Land Disposal Restricted wastes managed? Yes
If so, complete LDR checklist.

Is the facility operating as a generator? Yes
If so, complete the applicable sections of the Generator Requirements checklist for wastes being managed under generator status.

PERMIT STATUS

Permit Issued: September 30, 2003
Permit Effective Date: September 30, 2003
Permit Expiration Date: September 30, 2013

AUTHORIZED ACTIVITIES: Corrective Action

REMARKS - GENERAL INFORMATION

Include a list of waste(s) being managed at the site a brief description of site activity and waste handling procedures:

FACILITY DESCRIPTION

Gabriel Performance Products, LLC (Gabriel) is engaged in process development and the production of speciality chemicals. The hazardous waste accumulation areas at the facility include one, less-than-ninety (<90) container area and five, <90 day tanks.

HAZARDOUS WASTE MANAGEMENT UNIT DESCRIPTIONS

Hazardous wastes are segregated, accumulated, and stored in containers or tanks prior to off-site disposal. The hazardous waste accumulation area for containers is located in the main warehouse building ¹. The area is separated from other portions of the warehouse building via a wall and overhead door. The area is diked and has no floor drains, except for a blind sump.

Gabriel accumulates hazardous waste in five, <90 day tanks which are identified as T37, T44, T67, T77 and T79. Secondary containment is provided for these tanks.

HAZARDOUS WASTE DESCRIPTION

The facility manages the following hazardous wastes: D001, D002, D003, D018, D028, D038, F003, F005, P005, P022, U003, U007, U008, U041, U328 and U404. For amounts associated with these hazardous wastes, see the most recent annual report submitted by Gabriel.

The facility manages the following hazardous wastes within the <90 day tanks: T37-inactive, T44-D001/F003/F005, T67-D002, T77-D002/D003 and T79-D001/D038/F003/F005.

NOTES / ADDITIONAL INFORMATION

1. Facility closed the permitted container storage area. The facility is a LQG and will continue to use this area for the accumulation of hazardous waste in accordance with OAC rule 3745-52-34. As part of the January 15, 2003 closure certification statement, Gabriel committed to perform generator closure activities in accordance with OAC rules 3745-66-11 and 3745-66-14 prior to decommissioning the area.

Gabriel and Occidental Chemical Corporation will maintain their status as a permitted facility in order to implement Corrective Action activities. Additional information regarding facility description and Corrective Action activities may be found within the RCRA Part B application.

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 <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| 2. Are records of waste determination being kept for at least 3 years?[3745-52-40(C)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 3. Has the generator obtained a U.S. EPA identification number? [3745-52-12] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 4. Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 5. Are annual reports kept on file for at least 3 years?[3745-52-40(B)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 6. Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 7. Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E) & (F)] | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| 8. Does the generator accumulate hazardous waste? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

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 <input type="checkbox"/> | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
|--|------------------------------|--|------------------------------|

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

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

NOTE: Complete appropriate checklist for each unit.

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

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

MANIFEST REQUIREMENTS

- | | | | |
|--|---|-----------------------------|------------------------------|
| 12. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| 13. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

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 <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
|--|---|-----------------------------|------------------------------|

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

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

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

<u>Job Performed</u>	<u>Name of Employee</u>	<u>Date Trained</u>

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 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

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 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 one quart of acutely hazardous waste at any one 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
- 43. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:
 - 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

- 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
- 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.
 - 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]

Tank 61 closure certification report dated November 16, 2006.

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

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#
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) or 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 - NONE ON-SITE DURING INSPECTION

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 - NONE ON-SITE DURING INSPECTION

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#
No breakage observed.
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)]
- 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 - NO RELEASES OBSERVED DURING INSPECTION

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-transport 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:
- 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:
- 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

USED OIL PROHIBITIONS

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

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] Yes No N/A RMK#___
5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] Yes No N/A RMK#___
6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 or 3745-65 to 3745-69? [3745-279-22(A)] Yes No N/A RMK#___
7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No N/A RMK#___
8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil"? [3745-279-22(C)] Yes No N/A RMK#___
9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
- a. Stopped the release? Yes No N/A RMK#___
- b. Contained the release? Yes No N/A RMK#___
- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A RMK#___
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A RMK#___

10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes No N/A RMK# _____
- a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes No N/A RMK# _____
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A RMK# _____
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A RMK# _____
11. Does the generator have the used oil hauled only by transporters that have obtained an EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes No N/A RMK# _____

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

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

REMARKS

TANK SYSTEM REQUIREMENTS (OAC 3745-66-91 TO 3745-66-991)

1. Specify the type of tank system(s) used for hazardous waste management and if secondary containment (where required) has been provided:

NOTE: New Tank System - Installation commencing after July 14, 1986.

Existing Tank System - Installation or operation commencing on/before July 14, 1986.

(a) New tank system(s)? [3745-66-93(A)(1)] If so, Yes No N/A RMK# _____

i. Has secondary containment been provided? Yes No N/A RMK# _____

(b) Existing tank system(s) used to manage: F020, F021, F022, F023, F026 or F027? [3745-66-93(A)(2)] If so, Yes No N/A RMK# _____

i. Has secondary containment been provided? Yes No N/A RMK# _____

(c) Existing tank system(s) of known (documentable) age which is 15 years or greater? [3745-66-93(A)(3)] If so, Yes No N/A RMK# _____

i. Has secondary containment been provided? Yes No N/A RMK# _____

(d) Existing tank system(s) of known (documentable) age which is less than 15 years? [3745-66-93(A)(3)] Yes No N/A RMK# _____

[Secondary containment not required until tank reaches 15 years of age]

(e) Existing tank system(s) for which the age cannot be documented? [3745-66-93(A)(4)] If so, Yes No N/A RMK# _____

i. Has secondary containment been provided? Yes No N/A RMK# _____

[Secondary containment is required for all existing tank systems for which the age cannot be documented. The tanks were required to have secondary containment when the facility turned 15 years, or by January 12, 1995.]

2. Is the tank system used to manage a material that became a hazardous waste after January 12, 1987? [3745-66-93(A)(5)] If so, Yes No N/A RMK# _____

(a) Has secondary containment been provided? Yes No N/A RMK# _____

NOTE: Secondary containment is required within the time intervals in OAC 3745-66-93(A)(1) to (A)(4). The date the material became a hazardous waste must be used in place of January 12, 1989.

NOTE: If the tank system has no secondary containment, or a variance from secondary containment requirements has been granted, skip to page 5 of this Tank Systems Checklist.

3. Is the secondary containment one of the following:

(a) An External Liner? [3745-66-93(E)(1)(a) - (1)(f)] If so,

Yes No N/A RMK# _____

i. Is liner designed or operated to contain 100% of the capacity of the largest tank?

Yes No N/A RMK# _____

ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on & infiltration from a 25-year, 24-hour storm?

Yes No N/A RMK# _____

iii. Is liner free of cracks and gaps?

Yes No N/A RMK# _____

iv. Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release?

Yes No N/A RMK# _____

v. Are chemically resistant water stops in place at all joints? (concrete liners only)

Yes No N/A RMK# _____

vi. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? (concrete liners only)

Yes No N/A RMK# _____

(b) Vault System? [3745-66-93(E)(2)(a) - (2)(f)] If so,

Yes No N/A RMK# _____

i. Is vault system designed to contain 100% of the capacity of the largest tank?

Yes No N/A RMK# _____

ii. Is vault system designed and operated to prevent run-off and infiltration into the vault system, or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm?

Yes No N/A RMK# _____

iii. Are chemically resistant water stops in place at all joints?

Yes No N/A RMK# _____

iv. Is there a compatible interior coating to prevent migration into the concrete?

Yes No N/A RMK# _____

v. For ignitable or reactive waste: is the vault system provided with means to prevent against the formation or ignition of vapors?

Yes No N/A RMK# _____

vi. Is vault system provided with an exterior moisture barrier?

Yes No N/A RMK# _____

(c) Double-Walled Tank? [3745-66-93(E)(3)(a) - (3)(c)] If so,

Yes No N/A RMK# _____

i. Is double-walled tank designed as an integral structure to contain any release from the inner tank?

Yes No N/A RMK# _____

ii. If metal, are the primary tank interior and outer shell exterior surfaces protected from corrosion?

Yes No N/A RMK# _____

iii. Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time?

Yes No N/A RMK# _____

4. Is the secondary containment system for the tank(s) an equivalent device as described in 3745-66-93(D)(4) which has been approved by the Director? [3745-66-93(D)(E)]

Yes No N/A RMK# _____

SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION (OAC 3745-66-93(B)(C))

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

ANCILLARY EQUIPMENT REQUIREMENTS (OAC 3745-66-93(F))

7. Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)?
If not, is the ancillary equipment:
- (a) Inspected daily? AND: Yes No N/A RMK# _____
- (b) Is ancillary equipment one of the following:
- i. Above ground piping (exclusive of flanges, joints, valves and connections)? Yes No N/A RMK# _____
- ii. Welded flanges, welded joints and/or welded connections? Yes No N/A RMK# _____
- iii. Sealless or magnetic coupling pumps and/or sealless valves? Yes No N/A RMK# _____
- iv. Pressurized above ground piping systems with automatic shut-off devices (e.g. excess flow check valves, flow metering shutdown, and/or loss of pressure-actuated shut-off devices)? Yes No N/A RMK# _____

REMARKS

NEW TANK SYSTEM REQUIREMENTS (OAC 3745-66-92)

1. Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-66-92(A)] Yes No N/A RMK# _____

2. Does the written assessment include the following: [OAC 3745-66-92(A)]

(a) Certification by an independent, registered, professional engineer? Yes No N/A RMK# _____

(b) Consideration of the design standards of the system? Yes No N/A RMK# _____

(c) Consideration of the hazardous characteristics of the waste(s)? Yes No N/A RMK# _____

(d) An evaluation by a corrosion expert (if the external system/components are metal)? Yes No N/A RMK# _____

(e) A determination of design and operational measures that will be needed to protect the tank system from potential damage (for underground tank components)? Yes No N/A RMK# _____

(f) Design considerations to ensure that the tank foundations will maintain the load of a full tank? Yes No N/A RMK# _____

(g) Design considerations for anchoring the unit to prevent floatation (for tanks situated in a seismic fault zone or saturated zone)? Yes No N/A RMK# _____

(h) Design considerations to ensure that the tank system will withstand the effects of frost heave (for underground tank systems)? Yes No N/A RMK# _____

3. Are there written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)] Yes No N/A RMK# _____

Do the written statements address all of the following:

(a) Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)] Yes No N/A RMK# _____

(b) Statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)] Yes No N/A RMK# _____

(c) Proper backfilling? [3745-66-92(C)] Yes No N/A RMK# _____

(d) Tightness test; if the tank was found not to be tight, does the statement indicate that proper repairs were made? [3745-66-92(D)] Yes No N/A RMK# _____

(e) Proper support and protection of ancillary equipment? [3745-66-92(E)] Yes No N/A RMK# _____

(f) Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)] Yes No N/A RMK# _____

TANK SYSTEMS WITHOUT SECONDARY CONTAINMENT (OAC 3745-66-91)

1. For existing tank system, without secondary containment: Is there a written assessment on file which includes the following considerations: [3745-66-91(A)(B)]
 - (a) Design standards? [3745-66-91(B)(1)] Yes No N/A RMK# _____
 - (b) The characteristics of hazardous waste(s) that have been or will be handled? [3745-66-91(B)(2)] Yes No N/A RMK# _____
 - (c) Corrosion protection measures? [3745-66-91(B)(3)] Yes No N/A RMK# _____
 - (d) The age of the tank system has been estimated or documented? [3745-66-91(B)(4)] Yes No N/A RMK# _____
 - (e) A leak test has been conducted? (For non-enterable underground tanks) [3745-66-91(B)(5)(a)] Yes No N/A RMK# _____
 - (f) A leak test or an internal inspection by qualified P.E. has been conducted? (For other than non-enterable underground tanks and for ancillary equipment) [3745-66-91(B)(5)(b)] Yes No N/A RMK# _____
 - (g) Is assessment certified by independent, registered, P.E.? [3745-66-91(A)] Yes No N/A RMK# _____
2. Have the tests specified in 1e and 1f been conducted annually on the tanks and ancillary equipment until secondary containment is provided? [3745-66-93(I)] If so, Yes No N/A RMK# _____
 - (a) Have tests been certified by independent, registered, P.E.? Yes No N/A RMK# _____
3. For tanks without secondary containment used to store or treat wastes which become hazardous wastes after July 14, 1986, has the assessment been completed within 12 months of the date the waste became a hazardous waste? [3745-66-91(C)] Yes No N/A RMK# _____

TANK SYSTEM - GENERAL OPERATING REQUIREMENTS (OAC 3745-66-94)

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

TANK SYSTEM - INSPECTION REQUIREMENTS (OAC 3745-66-95)

1. Has the o/o documented the inspections required in 3745-66-95, in the operating record, including inspection of the following:
- (a) Spill control equipment (daily)? [3745-66-95(A)(1)] Yes No N/A RMK#___
 - (b) Above ground portion of tank (daily)? [3745-66-95(A)(2)] Yes No N/A RMK#___
 - (c) Data from leak detection equipment (daily)? [3745-66-95(A)(3)] Yes No N/A RMK#___
 - (d) Construction materials and area immediately surrounding the tank for signs of erosion or release of hazardous waste (daily)? [3745-66-95(A)(4)] Yes No N/A RMK#___
 - (e) Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(B)(1)] Yes No N/A RMK#___
 - (f) Where applicable, all sources of impressed current at least bi-monthly? [3745-66-95(B)(2)] Yes No N/A RMK#___

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES (OAC 3745-66-98 AND 3745-66-99)

1. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with one of the following: [3745-66-98(A)]
- (a) Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-65-17(B)? [3745-66-98(A)(1)] OR; Yes No N/A RMK#___
 - (b) Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A)(2)] OR; Yes No N/A RMK#___
 - (c) The tank is used solely for emergencies? [3745-66-98(A)(3)] Yes No N/A RMK#___

NOTE: Generators are not allowed to treat wastes (other than elementary neutralization) on-site without a permit.

2. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Code (1977 or 1981)? [3745-66-98(B)] Yes No N/A RMK#___
3. Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material? [3745-66-99] Yes No N/A RMK#___
- (a) If so, have the requirements of 3745-65-17(B) been met? Yes No N/A RMK#___

TANK SYSTEM - WASTE ANALYSIS REQUIREMENTS (OAC 3745-66-991)

1. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-991] Yes No N/A RMK# _____
- (a) Conducted waste analysis and trial treatment storage tests? [3745-66-991(A)] OR; Yes No N/A RMK# _____
- (b) Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-991(B)] Yes No N/A RMK# _____

TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE (OAC 3745-66-96)

1. Has there been a leak or spill from any tank system or has any tank system been found unfit for use? If so, did the o/o: Yes No N/A RMK# _____
- (a) Immediately cease flow of material into tank and investigate the cause of the release? [3745-66-96(A)] Yes No N/A RMK# _____
- (b) Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time? [3745-66-96(B)(1)] Yes No N/A RMK# _____
- (c) Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment? [3745-66-96(B)(2)] Yes No N/A RMK# _____
- (d) Immediately conduct a visual inspection of the release? [3745-66-96(C)] Yes No N/A RMK# _____
- (e) Prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C)(1)] Yes No N/A RMK# _____
- (f) Properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)(2)] Yes No N/A RMK# _____
- (g) Report the release to the Director within 24 hours unless it was less than 1 lb. and was cleaned up immediately? [3745-66-96(D)(1)(2)] Yes No N/A RMK# _____
- (h) Submit a written report of the incident to the Director within 30 days of the release? [3745-66-96(D)(3)] Yes No N/A RMK# _____
- (i) Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)] Yes No N/A RMK# _____
- (j) For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)] Yes No N/A RMK# _____

NOTE: The requirements noted in 1.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.

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

REMARKS