



State of Ohio Environmental Protection Agency

Northeast District Office



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Twinsburg, Ohio 44087

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

June 25, 2008

Mr. John Peterka
Heritage - WTI, Inc.
1250 Saint George Street
East Liverpool, OH 43920

**RE: HERITAGE - WTI, INC., FORMERLY VON ROLL AMERICA, INC., LQG/TSD
INSPECTION, OHD 980 613 541 / OHIO ID# 02-15-0589
COLUMBIANA COUNTY, NOTICE OF VIOLATION**

Dear Mr. Peterka:

On May 12 through May 15, 2008, the Ohio Environmental Protection Agency (Ohio EPA) conducted a semi-annual compliance evaluation inspection (CEI) of the Heritage - WTI, (WTI) Inc. facility in East Liverpool, Ohio. Inspectors with the Ohio EPA included Ms. Patricia Natali, Ms. Jodi Billman, Mr. Bill Lutz, Mr. Neil Wasilk, Mr. John Paquelet, and me. WTI was represented by Ms. Carrie Beringer and Ms. Amy Brady with the Environmental, Health, and Safety Department.

WTI was inspected to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC); Chapter 3745. of the Ohio Administrative Code (OAC); and WTI's Ohio Hazardous Waste Facility Installation and Operation Permit renewal issued on March 23, 2005. Ohio EPA's inspection of the facility also included observation of operations during walk through inspections and a review of written documentation of the facility's operating record.

Please respond to each of the items listed in this letter and send the requested information **within 30 days of the date of this letter:**

Violation:

1. **Permit Condition G-5 Emergency Equipment** - Table G.4 of the Contingency Plan (Section G of the Part B Permit Application) includes a complete list of emergency control equipment and spill recovery materials at designated locations throughout the facility. The table includes the quantity of items at each location.

As part of the CEI, the list of emergency equipment described in Table G.4 was compared to items located throughout the facility. During the inspection, Ohio EPA observed that several items (shovels, flashlights) had been removed and not replaced, i.e., the quantity at the location did not match the quantity listed in Table G.4. In addition, sand, listed as an item, had been stocked with an equivalent absorbent and the list had not been modified to reflect the change.

WTI replaced the missing items during the CEI, thereby abating the permit violation.

However, it is the opinion of the Ohio EPA that a modification should be submitted to revise the information on Table G.4 to better reflect the requirements listed in OAC Rule 3745-54-52(E).

OAC Rule 3745-54-52(E) requires a list of emergency equipment be included in the Contingency Plan, the location of the equipment, a physical description of each item on the list, and a brief outline of its capabilities. Please provide a description of the actions WTI will take to reconcile these issues.

General Concerns:

1. Manifest Review - During Ohio EPA's review of manifests, a few issues were found with regard to WTI outgoing hazardous waste.

Manifest #000164543WAS appeared to have an incorrect date by the transporter, due to the transporter not clearly writing the date. Manifest #000164507WAS indicated the transporter wrote an incorrect date for waste pickup at WTI, and then corrected the date. However, the correction was not made clearly enough to easily determine the actual date. Manifest #000177511WAS had been signed and dated with an incorrect date by the designated receiving facility. Manifests #000164556WAS and #000164800WAS were both signed but neither one included dates the hazardous waste was received at the designated facility. These specific instances were discussed with WTI personnel during the CEI. On June 2, 2008, WTI provided the missing and/or corrected information from the designated facilities regarding these five manifests.

In accordance with OAC Rule 3745-52-42(A)(1), when a generator does not receive a copy of a manifest with the handwritten signature of the owner or operator (O/O) of the designated facility within 35 days of the date the waste was accepted by the initial transporter, the generator is responsible for contacting the transporter and/or the O/O of the designated facility to determine the status of the hazardous waste. In accordance with OAC Rule 3745-52-42(A)(2), if the generator does not receive a copy of the manifest with the handwritten signature of the O/O of the designated facility within forty-five days of the date the waste was accepted by the initial transporter, an exception report is to be submitted to the Ohio EPA including information required in OAC Rule 3745-52-42(A)(2)(a) and (b).

WTI is aware of the requirements to track the status of hazardous waste shipments and submit exception reports if necessary. In order for WTI to track waste and submit exception reports when necessary, dates and signatures by both transporters and receiving facilities (as well as the generator) must be clearly written. All corrections must be made so there are no questions regarding the actual dates of waste pickup and receipt. Describe any additional actions to be taken to ensure compliance with the manifest requirements and submit to Ohio EPA within 30 days of the date of this letter.

2. Rack issues in container storage warehouse (Warehouse) and Container Holding Building (Slag Canopy) - The racks used for waste storage in these two areas are in need of inspection and evaluation to ensure all racks/bins have the appropriate number of horizontal bars to fully support the pallets of waste. Three bars appear to be the intended number in the Warehouse so that pallets of waste are secure and level. Two bars are generally found in each bin within the Slag Canopy where larger containers are usually stored.

Ohio EPA noticed that some bins (in both locations) are either missing a bar, or the bars are not spaced correctly, e.g., too far apart. Please describe actions to be taken by WTI in order to ensure all racks/bins in all the facility storage areas have an adequate number of correctly spaced horizontal bars to support the waste stored there and submit to Ohio EPA within 30 days of the date of this letter.

3. Repair schedule for Tank W-5 - Ohio EPA reviewed inspection/evaluations of tank corrosion testing conducted on WTI tanks during the fall of 2007 by an outside contractor. During the testing event, data indicated Tank W-5 had metal loss in course 3/plate 3, greater than 1/8 inch. Tank W-5 is a process water holding tank used to collect and store liquids from clean-up activities and/or spills, or storm water collected from active process areas at farms.

Please provide a schedule for the repair work for Tank W-5 and submit to Ohio EPA within 30 days of the date of this letter. In addition, we would appreciate a repair schedule for the upper portion of the facility's caustic tank which also showed signs of thinning. The caustic tank is a holding tank for caustic material used in the incineration system. It is not regulated by Ohio EPA.

4. Concrete Maintenance - The issue of concrete maintenance was discussed during the fall 2007 CEI, and as a response to that letter, WTI provided an outline of proposed actions, a list of areas to be repaired, and a timeline for activities through spring of 2008. Ohio EPA has observed WTI conducting concrete maintenance activities, including curb repair, expansion joint replacement, and crack repair in accordance with their proposal. WTI is also planning the reapplication of surface sealant in certain areas of the facility.

During the last week of June, Ohio EPA plans to evaluate the concrete maintenance completed in order to evaluate WTI's progress with regard to the proposal submitted. Ohio EPA will continue to monitor the ongoing concrete maintenance program. There is no response necessary for this concern at this time.

Comment:

1. Laboratory - The laboratory was evaluated to determine if issues observed during the fall 2007 CEI had been addressed. It appears all issues had been corrected and/or addressed as requested.

HERITAGE - WTI, INC.
LQG/TSD INSPECTION
JUNE 25, 2008
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2. Procedure for Testing Oxidizers - In the Direct Drum area, a field test to screen for oxidizers is conducted prior to waste being processed in accordance with Standard Operating Procedures. WTI is evaluating whether the oxidizer field test can be documented in some additional manner, such as in a logbook or computer.

As we discussed during the inspection, you may be able to reduce the waste your company generates. If you find ways to recycle, reduce or eliminate the amount of waste that your company generates you may be able to reduce treatment and disposal costs as well as regulatory requirements. If you would like a free, non-regulatory on-site pollution prevention assessment, or if you would like more information about pollution prevention, please contact me at (330) 385-8421. Ohio EPA has helpful information about this at the following web address: <http://www.epa.state.oh.us/ocapp/ocapp/>

The Ohio Department of Development's Office of Energy Efficiency may be able to help with energy efficiency issues. Their website is at: <http://www.odod.state.oh.us/cdd/oeef/>.

Enclosed you will find a copy of the checklists that were completed during the inspection. Should you have any questions, please call me at (330-385-8421). You can find copies of the rules and other information on the division's web page at: <http://www.epa.state.oh.us/dhwm/>.

Sincerely,

for 
Michelle Tarka
Environmental Specialist
Division of Hazardous Waste Management

MT:ddw

Enclosure: CEI Checklists

cc: Frank Popotnik, DHWM, NEDO
Patricia Natali, DHWM, NEDO
Carrie Beringer, Heritage-WTI, Inc.
Harry Sarvis, DHWM, CO
William D'Amico, US EPA, Region V

NOTICE: Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve Heritage-WTI from having to comply with all applicable regulations. This letter does not relieve Heritage-WTI from liability for any past or present violations of the state's hazardous waste laws.

**RCRA/STATE PART 'B' PERMIT
INSPECTION CHECKLIST**

**HERITAGE-WTI, INC.
OHD980613541 02 - 15 - 0589**

**MAY 2008
Revision 1**



OHIO PART B PERMITTED FACILITY RCRA INSPECTION CHECKLIST

Facility: Heritage-WTI, Inc. Ohio Permit: 02-15-0589
 Address: 1250 St. George Street U.S. EPA ID: OHD 980 613 541
East Liverpool, OH 43920 Phone: (330) 385-7336
 County: Columbiana

Inspection Date: 5 / 12 / 08 Time: 8:30 (a.m.) p.m.
thru 5 / 108

Was advance of the inspection given? YES NO

If so, how far in advance was notice given? NA

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspectors:	<u>Patricia Natali</u>	<u>OEPA/on-site</u>	<u>(330)385-8447</u>
	<u>Michelle Tarka</u>	<u>OEPA/on-site</u>	<u>(330)385-8421</u>
	<u>Jodi Billman</u>	<u>OEPA /CO</u>	
Inspectors:	<u>Bill Lutz</u>	<u>OEPA /medo</u>	
	<u>John Paquette</u>	<u>OEPA /medo</u>	
	<u>Neil Wasilk</u>	<u>OEPA /medo</u>	

1 day
5/12

Facility Reps: Carrie Beringer
Army Brady
also spoke to Kevin Uoyel
Jeff Hall

Is facility operating as a generator? YES NO



PERMIT STATUS

Permit Issued: May 19, 1997 (Permit Effective Date)

Permit Expiration Date: May 19, 2002 (5 years after the Permit Effective Date)

Renewal Permit Issued: March 23, 2005 (Renewal Permit Effective Date)

Renewal Permit Expiration Date: March 23, 2015 (10 years after the Permit Effective Date)

Generator Checklist Attached: (2) Yes No

Used Oil Checklist Attached: Yes No

LDR Checklist Attached: Yes No

Universal Waste Checklist Attached: Yes No

Pollution Prevention Checklist Attached: Yes No

Tank System Checklist Attached: Yes No

AUTHORIZED ACTIVITIES

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

Post-Closure Care Corrective Action



REMARKS AND GENERAL INFORMATION

Heritage-WTI, Inc. (WTI) operates a commercial hazardous waste incineration system with ancillary storage and process capabilities. WTI is located in Columbiana County, East Liverpool, Ohio. Since 1992, WTI has accepted characteristic and listed hazardous waste as well as non-hazardous waste and is presently permitted to accept over 480 hazardous waste codes. The facility also accepts waste that may be stored (but not treated) and subsequently sent off-site to another facility for recycling, treatment, or processing. This type of waste is commonly referred to as third-party waste, with asbestos waste being an example. WTI has a fuel blending program in place, whereby off-site generated waste may be received, blended, and incinerated on-site, or sent off-site as fuel.

The facility is not permitted to accept, store, or treat the following wastes: 1) waste with a source concentration greater than 50 ppm of PCBs or waste that is or was regulated by TSCA; 2) waste that is assigned hazardous waste codes F020 through F023, and/or F026 through F028; 3) infectious waste; 4) chemical warfare agents and other chemical weapons; 5) radioactive waste; 6) compressed gases except for those used as the propellant in aerosol cans, and except for specific compressed gas approved by Ohio EPA and listed in the WTI permit; 7) wastes carrying specific P and U waste codes that are prohibited by the permit. Other waste may have treatment restrictions, such as waste containing benzene in concentrations greater than 10% (due to NESHAP restrictions). In addition, WTI is not permitted to store, but may treat, waste characterized as Class 1A flammable liquids (those wastes with a flashpoint >73 degrees and a boiling point < 100 degrees Fahrenheit).

WTI treats liquid, solid, and semi-solid (sludge) waste received in containers or as bulk loads. Specific compressed gases approved for incineration at the facility may be received in containers or bulk. The facility also receives consumer packaged material and lab packs. Bulk liquid waste can be transferred to the facility's Organic Waste Tank Farm for storage and/or blending or fed directly to the incinerator. Bulk solid waste may be transferred to the Bulk Solid Waste Storage Tanks or processed through other approved means. Depending upon the waste, containers may be processed directly to the incinerator, transferred to the Bulk Solid Waste Storage Tanks, blended in the Pump Out Tanks, consolidated into hoppers for processing via the Bucket Hoist, split into smaller containers, or processed through the Extruder.



WTI utilizes a rotary kiln Incineration System for the incineration of 50,000 to 88,000 tons of waste annually. Waste generated from the incineration process includes slag and ash, which is tested in accordance with Section C, Waste Characteristic and Waste Analysis Plan, of the Part B permit application. The slag and ash may be sent off-site for further treatment or for disposal at a hazardous waste landfill. On occasion, water from the Four Stage Wet Scrubber is sent off-site for disposal at a hazardous waste facility. Used brick is generated when the rotary kiln is re-lined, typically once a year. The used brick is sent off-site for disposal at a hazardous waste landfill. Other wastes generated on-site include maintenance and clean-up materials, lab waste generated by the on-site laboratory, and personal protective equipment. Most of these wastes are treated on-site via the Incineration System.

As part of the facility's waste minimization program, WTI recycles water from the Four Stage Wet Scrubber back into the Incineration System as process water. Carbon used in the vapor recovery system may be regenerated by the manufacturer or treated through the Incineration System via the Bulk Solid Waste Storage Tanks. Fluorescent light bulbs are sent off-site for recycling. Containers, such as drums and totes, are typically re-used on-site as satellite accumulation drums or for splitting waste. Most of the pallets used at WTI are constructed of durable materials and consequently WTI has reduced the number of pallets that need to be purchased. Wood pallets that are received at WTI may be sent off-site for re-use. In the lab, the use of an accelerated solvent extractor has reduced solvent waste by 80%. In addition, the purchase of chemicals on an "as-needed" basis has reduced the amount of chemicals exceeding their shelf life before use. WTI has a full-time maintenance department which reconditions and repairs equipment and materials so as to eliminate their disposal. WTI has also implemented a paper reduction initiative, which includes working towards becoming a paperless workplace.

WTI has a groundwater monitoring program in place at the facility as required by the Ohio Facility Installation and Operation Permit. The program includes semi-annual monitoring events at designated wells located on WTI property both within and outside the fence line. The facility has one area of concern (AOC) that is currently under an Administrative Consent Agreement with the Ohio EPA. This AOC, the former Charter Oil Facility Release Area, is also being addressed through Corrective Action as described in the Ohio Facility Installation and Operation RCRA Permit.



GENERAL CONDITIONS OF PERMIT

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 activities regulated by the permit after the expiration date of the permit? Yes ___ No ___ N/A RMK#
- b. Has the Permittee submitted an application for a permit renewal to the director no later than 180 days prior to the expiration date of the permit? [or upon a later date if the Permittee can demonstrate good cause for late submittal] [Condition A.6.(a)] Yes ___ No N/A RMK#

NOTE: The Permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:

- i. The Permittee has submitted a timely and complete application for a renewal permit under OAC rule 3745-50-40; and
- ii. Through no fault of the Permittee, a new permit has not been issued pursuant to OAC rule 3745-50-40 on or before the expiration date of the permit. [Condition A.6.(b)]

2. Has the Permittee submitted the annual permit fee, payable to "Treasurer, State of Ohio," to Ohio EPA on or before the anniversary date of issuance during the term of the permit? [Condition A.26] 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? [Condition A.1.(b) and A.5.] Yes No N/A ___ RMK#

NOTE: If any of the provisions of the permit have been held invalid the remainder of the permit is not affected by that holding. [Condition A.4.]

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

REMARKS

3/28/08 Conting Plan Activation (Pitz)



a. Did the Permittee report orally the incident to Ohio EPA's Division of Emergency and Remedial Response (DERR) and the Division of Hazardous Waste Management (DHWM) East Liverpool Field Office within two hours of becoming aware of the circumstances? [Condition A.20.(a)]

Yes No N/A ___ RMK#

b. After initial notification, did the Permittee immediately report to Ohio EPA's DERR and the East Liverpool Field Office any subsequent changes in the situation as conditions warranted until such time as all information as required by Condition A.20.(b) was submitted?

Yes No N/A ___ RMK#

NOTE: Condition A.20.(b) requires that the Permittee report orally the following information; and Condition A.21(b) requires the Permittee provide a written report including the following information:

1. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and
2. Information concerning a release of any hazardous waste, fire or explosion at the facility which could threaten human health or the environment, including a description of:
 - a. Name, address and telephone number of the owner/operator.
 - b. Name, address and telephone number of facility.
 - c. Description of the incident, name and quantity of materials(s) involved.
 - d. Date and time of release, fire, or explosion.
 - e. The extent of injuries, if any.
 - f. An assessment of the actual or potential hazard to the environment and human health inside and outside the facility where applicable.
 - g. Estimate quantity and disposition of recovered material that resulted from the incident

5. Did the Permittee provide a written report to Ohio EPA's DERR and the East Liverpool Field Office within five days of the time the Permittee became aware of the circumstances reported in Question 4? [Condition A.21.(b)] If so, did the report contain:

Yes No N/A ___ RMK#

a. A description of the noncompliance (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 human health and the environment and to reduce 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.(c)]



6. Has the Permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8.] Yes No N/A RMK#
7. Has the Permittee identified any other instances of noncompliance not provided for in Condition A.22.? Yes No N/A RMK#
- a. If so, did the Permittee report these instances to Ohio EPA's DHWM within a month of the time at which the Permittee is aware of the noncompliance? [Condition A.22.] Yes No N/A RMK#
- b. Do the reports provided contain the information set forth in Condition A.20.? 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 Permittee 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 pursuant to Conditions A.5. and A.14.

REMARKS



MT/CB

PERMIT MODIFICATION, REVISION, REVOCATION

1. Has the Permittee filed a request for a permit modification, revision or revocation since issuance of the renewal permit? [Condition A.2.] Yes No N/A RMK#

2. Has the permit been transferred to a new owner/operator? [Condition A.18.] Yes No N/A RMK#

a. If so, has the transfer been conducted in accordance with ORC Chapter 3734. and the rules adopted thereunder? and [Condition A.18.] Yes No N/A RMK#

b. Before transferring ownership did the Permittee notify the new owner in writing of the requirements of ORC Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.18.] Yes No N/A RMK# #1
recent name change

NOTE: The Permittee's failure to notify the new owner or operator of the requirements of the applicable Ohio law or hazardous waste rules does not relieve the new owner or operator of its obligation to comply with all applicable requirements. [Condition A.18.(c)]

3. If the Permittee is subject to a compliance schedule (OAC rule 3745-50-58(L)(5) and 3745-50-50), has the Permittee submitted reports of compliance or noncompliance with, or any progress reports on, the requirements contained 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#

4. Has the Permittee furnished relevant information which the Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, or to determine compliance with the permit? [Condition A.10.] Yes No N/A RMK#

5. Has the Permittee furnished Ohio EPA, upon request, copies of records required to be kept by the permit? [Condition A.10.] Yes No N/A RMK#

#1 Recent name change eval'd by legal

MT/CB

6. 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. If so, *No...*
- a. Has the Permittee promptly submitted such facts or corrected information to the appropriate entity? [Condition A.24.] Yes No N/A RMK#
7. Is the Permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications to the application? [Condition A.14.(c)] Yes No N/A RMK#
8. Is the Permittee retaining a complete copy of the approved application on-site? [Condition A.14.(c)] Yes No N/A RMK#
9. Is the Permittee planning any physical alterations or additions to the permitted facility? Yes No N/A RMK#
- a. If so, has the Permittee given notice to the director of such alternations/additions? [Condition A.15.] Yes No N/A RMK#
- b. Have such changes been made in accordance with OAC rule 3745-50-51? [Condition A.15.] Yes No N/A RMK#

REMARKS

#1 Facility has future mods planned, as always. Facility follows OAC.



MT

SITE ENTRY - AVAILABILITY OF RECORDS

1. As specified in Condition A. 11., has the Permittee allowed the director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection to:

- a. Enter at reasonable times upon the premises where a regulated activity is located and where records are kept under the conditions of the permit? Yes No N/A ___ RMK#
- b. Have access to and copy any records required to be kept under the conditions of the permit? Yes No N/A ___ RMK#
- c. Inspect and photograph at reasonable times 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 or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by RC Chapter 3734. and the rules adopted thereunder? Yes No N/A ___ RMK#

REMARKS

5/12 checked logbook of incoming waste
(MT)



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MT

SITE ENTRY - AVAILABILITY OF RECORDS

1. As specified in Condition A.11., has the Permittee allowed the director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection to:

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

Yes No N/A ___ RMK#

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

Yes No N/A ___ RMK#

c. Inspect and photograph at reasonable times 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 or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by RC Chapter 3734. and the rules adopted thereunder?

Yes No N/A ___ RMK#

REMARKS

5/12 checked logbook of incoming waste
MT

RECORD KEEPING REQUIREMENTS

CONFIDENTIALITY

1. Has the Permittee requested confidentiality of any information of the permit in accordance with ORC Chapter 3734. and the rules adopted thereunder? [Condition A.25.] *customer info, for example* Yes No N/A RMK#

OPERATING RECORD

2. Is the Permittee maintaining a written operating record at the facility as set forth in OAC rules 3745-54-73 and 3745-54-74? [Condition B.22.] Yes No N/A RMK#
- a. A description of the quantity of each hazardous waste and methods and dates of its treatment and/or storage? Yes No N/A RMK#
- b. The location of each hazardous waste and quantity at each location? Yes No N/A RMK#
- c. Records and results of waste analyses? 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 inspections? Yes No N/A RMK#
- f. Notice to generators that the Permittee has appropriate permit to accept their waste? Yes No N/A RMK#
- g. Documents required to be maintained by land disposal restriction requirements of Chapter 3745-59? Yes No N/A RMK#
3. Is the Permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents: [Condition A.28.]
- a. Waste analysis plan in accordance with OAC rule 3745-54-13 and the conditions of the permit? Yes No N/A RMK#



3. Operating Record:

- b. Contingency plan in accordance with OAC rule 3745-54-53 and the conditions of the permit? Yes No N/A ___ RMK#
- c. Closure plan in accordance with OAC rule 3745-55-12 and the conditions of the permit? Yes No N/A ___ RMK#
- d. Cost estimate for facility closure in accordance with OAC rule 3745-55-42 and the conditions of the permit? [estimate only - adequacy of estimate will be evaluated by CO financial assurance personnel] Yes No N/A ___ RMK#
- e. Personnel training plan and records required by OAC rule 3745-54-16 and the conditions of the permit? Yes No N/A ___ RMK#
- f. Operating record as required by OAC rule 3745-54-73 and the conditions of the permit? Yes No N/A ___ RMK#
- g. Inspection schedules developed in accordance with OAC rules 3745-54-15 and 3745-57-92 and the conditions of the permit? Yes No N/A ___ RMK#
- h. Post-closure plan as required by OAC rule 3745-55-18(A) and the conditions of the permit? Yes No N/A ___ RMK#
- i. Annually-adjusted cost estimate for closure and post-closure, as required by OAC rules 3745-55-42 and 3745-55-44 and the conditions of the permit? Yes No N/A ___ RMK#
- j. All other documents required by permit Conditions A.12 and A.14? Yes No N/A ___ RMK#
4. Have any of the documents identified in Question #3 been revised, amended or modified? If so, Yes No ___ N/A ___ RMK#
- a. Has the Permittee submitted the changes to Ohio EPA? [Condition A.28.(b)] Yes No N/A ___ RMK#
- b. Has the Permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.28.(b)] Yes No N/A ___ RMK#

*ex: annual clos cost ILOC - mods
in early 2008 approved*

ex: conting plan emerg resp Table



4. Operating Record

5. Is the Permittee maintaining copies of all inspection logs at the facility for a period of at least three years from the date of inspection? [Condition A.28.(c)] *M*

Yes No N/A ___ RMK#

6. Is the Permittee maintaining copies of corrective action reports and records as required by Condition D.1. and D.6. for a period of at least three years after all corrective action activities have been completed?

Yes No N/A ___ RMK#

REMARKS



Amy

JP

ANNUAL REPORT REQUIREMENT

7. 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 and the conditions of the permit? [Condition B.25.]

Yes No N/A RMK#

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

BL

8. In compliance with Condition A.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 measurements?

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#

9. 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 WAP? [Condition A.12.(a)]

Yes No N/A RMK#

a. Do the standard operating procedures (SOPs) for obtaining samples include instructions that mirror the method specified in SW-846 and/or the approved WAP?

Yes No N/A RMK#

10. Has Ohio EPA requested submittal of any reports or other information required by the conditions of the permit from the Permittee? If so,

Yes No N/A RMK#

a. Have the submittals been signed and certified accordance to OAC rule 3745-50-42? [Condition A.13.]

Yes No N/A RMK#



Amy of Carrie
Fall 2007

JP

WASTE MINIMIZATION REQUIREMENTS

11. Did the Permittee submit a Waste Minimization Report, to Ohio EPA, SEDO and the Technical Assistance Unit, Office of Pollution Prevention of the permit, within 180 days of permit journalization? [Condition A.29.(a) and (c)]
Yes No N/A ___ RMK#
12. Following the first submittal as identified above in Question #10, has the Permittee submitted, once every two years, updates to this report as required by Condition A.29.(a) to the Technical Assistance Unit, Office of Pollution Prevention? [Condition A.29.(a)]
Yes No N/A ___ RMK#
13. Does the Permittee annually certify in the operating record and the annual report required by OAC rule 3745-54-75(H), (I) and (J) that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the Permittee to be economically practicable? [Condition A.29.(b)]
Yes No N/A ___ RMK#

REMARKS



MANIFEST REQUIREMENTS

1. Is all hazardous waste transported from the facility by a properly registered transporter of hazardous waste in accordance with all applicable laws, rules and standards? [Condition A.16.]

Yes No N/A ___ RMK#

2. 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(C)(D)(E)?

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#



WTI rec'd the signed & dated manifests & provided OEPA after exit interview

MANIFEST REQUIREMENTS

3. Has the Permittee received a return copy of each completed manifest within 35 days of the date the waste was accepted by the initial transporter?

Yes No N/A RMK#

a. If not, has the Permittee complied with the manifest exception reporting requirements of OAC Rule 3745-52-42?

Yes No N/A RMK#

4. Manifest Discrepancy Report. If the Permittee received hazardous waste from an off-site source where the weight, piece count or composition of the waste was not the same as on the manifest for that shipment, has the Permittee (OAC Rule 3745-54-72) [Condition B.24.(b)]

a. Noted the discrepancy on the manifest?

Yes No N/A RMK#

b. Attempted to reconcile the discrepancy with the generator?

Yes No N/A RMK#

c. Sent a letter to the Director describing the discrepancy and the attempts to resolve it and a copy of the manifest for the disputed waste shipment, if the discrepancy was not resolved within fifteen (15) days of discovery?

NO LETTERS SINCE LAST CBI-

Yes No N/A RMK#

5. Has the Permittee notified the Ohio EPA in writing at least four (4) weeks in advance of receipt of hazardous waste from a non-United States source? [Condition B.2.]

NOTE SINCE LAST CBI-

NOTE: Notice of subsequent shipments of the same waste from the same non-United States source in that same calendar year is not required.

Yes No N/A RMK#

6. Unmanifested Waste Report. Has the Permittee received unmanifested waste, with waste not excluded from the manifest requirements of OAC Rules 3745-51-05? If so, in accordance with Condition B.24.(c):

Changed per answers Natali email 6/9/08

a. Did the Permittee submit a report to the Director within fifteen days of receipt of the waste?

Yes No N/A RMK#

b. Did the report include information required under OAC Rule 3745-54-76?

Yes No N/A RMK#

WTI report from 3/25/08. Generator was from West Virginia



AVAILABILITY, RETENTION, AND DISPOSITION OF RECORDS

- 1. Has the Permittee complied with the requirements set forth in OAC Rule 3745-54-73 and all applicable sections of the approved Part B permit application regarding an operating record, including information to be recorded and maintenance thereof. [Condition B.22] Yes No N/A ___ RMK#

- 2. Has the Permittee furnished upon Ohio EPA request any and all records at the facility in accordance with OAC Rule 3745-54-74, the approved Part B permit application, and all terms and conditions of this permit? Yes No N/A ___ RMK#

- 3. Has the Permittee retained all records at the facility in accordance with OAC Rule 3745-54-74, the approved Part B permit application, and all terms and conditions of this permit? Yes No N/A ___ RMK#

REMARKS



WASTE ANALYSIS

1. Does the Permittee have a detailed chemical and physical analysis of waste streams which contains all information necessary to properly treat, store or dispose of the waste in accordance with OAC Chapters 3745-54 to 3745-57 and Condition B.3. of the permit? [OAC rule 3745-54-13(A)(1)]

Yes No N/A RMK#

a. If the waste is characterized as a miscellaneous special waste, does the Permittee have sufficient information from the generator in order to properly manage and treat the waste?

approvals group

Yes No N/A RMK#

2. Does the Permittee repeat the analyses required in OAC Rule 3745-54-13 and the WAP,

a. When the generator of the waste notifies the Permittee the process generating the waste has changed?

Yes No N/A RMK#

b. Annually?

approvals group
Yes No N/A RMK#

3. With regard to waste approved as 'Conditional', has the Permittee:

a. Collected the pre-acceptance sample upon receipt of the first shipment?

Yes No N/A RMK#

b. Conducted analytical within two weeks of receipt of the first shipment?

Yes No N/A RMK#

4. If a waste delivery is discrepant from the profile, e.g., application of characteristic codes, does the Permittee revise both the manifest and the profile when appropriate?

Yes No N/A RMK#

a. If the profile requires a modification regarding the processing of the waste and/or the application of D001, D002, and/or D003, has the Permittee submitted a profile revision to the Ohio EPA for review?

approvals
Yes No N/A RMK#

5. Prior to transferring waste to a tank in any of the tank farms, does the Permittee conduct all testing, e.g., compatibility, oxidizer, heating value, prior to the transfer?

Yes No N/A RMK#

only compat



WASTE ANALYSIS

6. Does the Permittee treat any restricted wastes for which a specified technology (or technologies) has/have been established as the LDR treatment standard? Yes ___ No N/A ___ RMK#
- a. If so, is the Permittee using the appropriate technology as required by OAC rule 3745-270-42 (40 CFR 268.42)? Yes ___ No N/A RMK#
7. Has the Permittee submitted for review and approval, all waste profile surveys (WPS) prior to scheduling and receipt at the facility? *Approvals* Yes No N/A ___ RMK#
- a. In the case of conditional approvals, has the Permittee abided by all conditions? Yes No N/A ___ RMK#
- b. In the case of third party waste, has the Permittee ensured that the waste was not incinerated, but transferred off-site to a permitted facility? Yes No N/A ___ RMK#
8. When an outside laboratory is contracted to conduct services for the Permittee, is the laboratory audited and their quality control/quality assurance plan evaluated prior to performing services for the Permittee? Yes No N/A ___ RMK#
- a. Are the results of the audits maintained as part of the facility's operating record? Yes No N/A ___ RMK#
9. Does the Permittee maintain proper functional instruments, use approved sampling and analytical methods, verify the validity of sampling and analytical procedures, and perform correct calculations? Yes No N/A ___ RMK#
10. When the Permittee uses a contract laboratory to perform analyses, does the Permittee inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this permit including all requirements found in the facility's quality control/quality assurance plan? Yes No N/A ___ RMK#
11. Is the Permittee following the procedures described in Section C, Waste Characteristics and Waste Analysis Plan, of the Part B permit and conditions of this permit, e.g., copy over procedures, sampling, analyses, and revisions? Yes No N/A ___ RMK#



WASTE ANALYSES

12. When applicable, and before waste is fed into the incinerator, has the Permittee determined the metals concentration of the waste stream and included the value into the DCS to ensure feed rates are not exceeded? *Operations, metals are determined*
Yes No N/A RMK#
13. Does the Permittee conduct adequate sampling and analytical for PCBs?
Yes No N/A RMK#
- a. Provide the lab procedure for the sampling methodology *Operations does samples, lab does analysis*
Yes No N/A RMK#
14. Has the Permittee determined the composition and heat value of any auxiliary fuel used in the incineration of any hazardous waste during start-up and shut-down procedures and during upset conditions?
Yes No N/A RMK#
- a. If the Permittee used high BTU auxiliary fuel which was hazardous because it was ignitable (EPA waste code D001), did the Permittee perform analytical to ensure the waste contained none of the hazardous constituents listed in the appendix to OAC Rule 3745-51-11?
Yes No N/A RMK#
15. Does the Permittee verify the waste analysis according to the quality assurance section of the waste analysis plan?
Yes No N/A RMK#
16. Has the Permittee performed the following analysis:
- a. Pre-acceptance, a detailed chemical and physical analysis of a representative sample of the hazardous waste in order to determine if the waste is acceptable at the facility and to determine all the information that must be known in order to store and/or treat the waste in accordance with the requirements of OAC Chapters 3745-54 to 3745-57 and 3745-59 and the terms and conditions of this permit and permit application?
Yes No N/A RMK#
- b. Fingerprint, analyses on incoming waste to determine if it matches the identity of the waste specified on the profile and the accompanying manifest or shipping papers? (OAC Rule 3745-54-13(A)(4))
Yes No N/A RMK#
- c. Supplemental analyses when necessary to completely characterize the waste prior to treatment?
Yes No N/A RMK#
17. Does the Permittee use only the analytical test methods as specified in the approved facility Waste Characteristic and Waste Analysis Plan?
Yes No N/A RMK#

11/11/11

WASTE ANALYSIS

18. Does the Permittee obtain samples of waste for analysis using the methods and equipment specified in the approved facility Waste Characteristic and Waste Analysis Plan?

operation or BOP
Yes ___ No N/A ___ RMK#

19. Does the Permittee manage and treat lab pack waste in accordance with the approved facility Waste Characteristic and Waste Analysis Plan?

Field Services
Yes ___ No N/A ___ RMK#

20. Does the Permittee manage and treat restricted waste in accordance with the approved facility Waste Characteristic and Waste Analysis Plan?

Product Management
Yes ___ No N/A ___ RMK#

21. Does the Permittee compare analytical results of samples of the incinerator treatment residues to the appropriate treatment standards or technology standards to ensure the treatment residues meet the applicable treatment standards for that waste? (OAC Rule 3745-59-07(B))

Yes No N/A ___ RMK#

22. Does the Permittee submit a certification with the treatment residue to the land disposal facility stating that the waste or treatment residue has been treated in accordance with the appropriate treatment standards? (OAC Rule 3745-59-07(B)(5))

Yes No N/A ___ RMK#



J.P.

GENERAL INSPECTION REQUIREMENTS

- 1. Is the Permittee following the inspection procedures and schedules described in Section G and Section F of the approved permit application and the requirements of OAC rules 3745-54-15 and 3745-57-92? [Condition B.5.] Yes No N/A ___ RMK#
- 2. Does the Permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [3745-54-15(A)(1)(2)] Yes No N/A ___ RMK#
- 3. Does the Permittee remedy deterioration or any malfunctions discovered by an inspection as required by OAC rule 3745-54-15(C)? [Condition B.5.] Yes No N/A ___ RMK#
- 4. Is the Permittee maintaining records of inspections for a minimum of three years? [Condition B.5.] *all three years not inspected.* Yes No N/A ___ RMK#
- 5. Are all inspection forms filled in completely, signed by the inspector, dated, with corrective actions noted, if appropriate? Yes No N/A ___ RMK#
- 6. Is the Permittee testing the facility Automatic Waste Feed Cut-Off System in accordance with the permit? Yes No N/A ___ RMK#

REMARKS



MT

SECURITY PROVISIONS/FACILITY OPERATIONS

- 1. Is the Permittee complying with the security provisions of OAC rule 3745-54-14(B)(1)(2) and (C) and Section G of the approved permit application? [Condition B.4.]
 - a. Does the Permittee have an employee at the public access gate 24 hours a day, 7 days a week? Or
 - b. An artificial barrier such as a fence (in good repair) which completely surrounds the active portion of the facility? Or
 - c. A means to control entry, at all times, through gates or other entrances, to the active portion of the facility?
- 2. Has the Permittee inspected the fence which encloses the entire plant in accordance with Section F, for breaks, corrosion and effectiveness?
 - a. If damage to the fence is observed, does the Permittee ensure the security of the facility is maintained?
 - b. Does the Permittee repair the damage to the fence as soon as possible?
- 3. Are all entry gates and other locations posted with signs prohibiting unauthorized entry?
- 4. 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 waters? [Condition B.1.]

REMARKS



MT/CB

FACILITY OPERATION

- 1. Has the Permittee constructed and does the Permittee maintain and operate the facility 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 waters? Yes No N/A ___ RMK#
- 2. Is the Permittee complying with all environmental permits for the facility? Yes No N/A ___ RMK#
- 3. Does the Permittee accept for treatment at the facility only the types of hazardous wastes that are included in the Ohio Hazardous Waste Installation and Operation Permit and the approved Part B permit application? Yes No N/A ___ RMK#
- 4. Does the Permittee accept for third party or fuel blending processing only the types of hazardous wastes permitted in the Ohio Hazardous Waste Installation and Operation Permit and the approved Part B permit application? Yes No N/A ___ RMK#
- 5. Does the Permittee treat not more than 176,000 tons (total or 88,000 tons per incinerator system) of hazardous wastes in a year? Yes No N/A ___ RMK#
- 6. Does the Permittee ensure that the wastewater treatment system at the facility is used to treat not more than ten percent (10%) of the total amount of waste received at the facility each year? Yes ___ No N/A RMK#
- 7. Does the Permittee maintain compliance with Chapters 3704., 3734., and 6111 of the Ohio Revised Code and all Rules and standards adopted under these Rules? Yes ___ No N/A ___ RMK#
- 8. Does the Permittee ensure that hazardous wastes received at the facility are not shipped on the Ohio River? Yes No N/A ___ RMK#

REMARKS

#1 Permitted for a wastewater treatment system that is not currently installed



Vince + CB

PERSONNEL TRAINING

1. Is the facility conducting personnel training in accordance with Section H of the approved permit application and the following requirements of OAC rule 3745-54-16: [Condition B.6.]

Yes No N/A ___ RMK#

a. The Permittee 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)(C)]

Yes No N/A ___ RMK#

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

Yes No N/A ___ RMK#

Note: This applies to employees assigned to the facility for the first time or transferred to a new position within the facility.

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

Yes No N/A ___ RMK#

remove space

d. Does the Permittee ensure that new employees do not work alone until their training, including on-the-job training, is complete?

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#

* Any transfers? ^{new position not transfers} Keith Meyer Annette Harris
X-transfers } same job shadowing - Control room/BOP
Apprenticeships } E&I/BOP
Maintenance/BOP
Training Records for Curt Cox & Donna Tribblood
Nick Cosmouidi John Jay Contractor
Rich Kupiec

questions for Karen B about those in Apprenticeship

ask Jeff



Jeff will get updated sheet of the list of ERT

correct ✓
Jeff Hall
PW
2008

Is there documentation of who participates during ER?

PERSONNEL TRAINING

Does the Permittee ensure employees do not respond to facility emergencies until and unless they are trained for emergency response and/or they are up-to-date and current with all their emergency response training?

Yes No N/A RMK#

only 1 person, Bill Bull, hired in Feb 2008 Section H? Section G?

* C.B.?

Does the Permittee modify Section H, Training Plan, in the event changes at the facility such as title changes, job duty (names, addresses, and/or phone numbers), training requirements, and/or changes in the responsibilities of positions listed in the Training Plan?

Yes No N/A RMK#

* Documentation? list of contractors & dates on site

Does the Permittee provide training to contractors on potential hazards they may encounter while working on-site?

Yes No N/A RMK#

Yes No N/A RMK#

a. Are contractors instructed on site-specific safety requirements and procedures?

Yes No N/A RMK#

m PW - temps that report to WTI

b. Is the training for contractors recorded and maintained at the facility as part of the operating record

Does the Permittee ensure training required by the Training Plan is taught by qualified instructors knowledgeable in the topic to be taught?

Yes No N/A RMK#

Does the Permittee ensure employees receive training for actions to be taken in an emergency situation to minimize hazards to human health and/or the environment? For example:

Yes No N/A RMK#

7. Check training records multiple SOPs + walk throughs SS-300

a. chemical/physical hazards of wastes managed at the facility including safety precautions to minimize risk to human health and the environment?

Yes No N/A RMK#

b. policies and procedures regarding critical monitoring equipment and controls?

Yes No N/A RMK#

c. design, applications, and limitations of personal protective equipment (PPE) provided for employees, including respiratory protections, chemical protective clothing, and general safety equipment?

Yes No N/A RMK#

d. contingency plan activation and emergency response

Yes No N/A RMK#

e. Spill containment and control procedures including equipment location and use and decontamination procedures

Yes No N/A RMK#

SS-300

SS-465

SS-200

ERSOP 13, 14, 15

All total

* Training records for contractors

Yes



Day 1 Employee orientation
Karen + Karen - HR

Jeff ~~and~~ assigns them to a computer + they look at "Items to Remember" re: SOPs required only include a couple imp. points from SOPs so they are not overwhelmed

interactive video training = 120 total

↳ each position has a subset of the 120

Scavenger hunt of plant to break up sitting at a computer for hours.

E + I	MM	ST	SS
Electrian +	! maintenance	Service Techs	Safety Techs



1 employee hired in Feb 2008 has not rec'd all training as of this CEI 2008 ✓
 Jeff H.

there ^{one} of all responders employees in categories 1+2
 Yes all get added

PERSONNEL TRAINING

8. Are all responders, employees holding positions in operations and operations management (Categories 1 and 2 in the Table of Job Categories in the Training Plan), up-to-date and current in fire training such as response to fires or explosions, emergency response team procedures, Hazardous Materials Technician (40 hour), and structural fire brigade?
 Yes No N/A RMK# 1

9. Have these employees also been trained in the areas of:
 a. selection and use of personal protective equipment (PPE), air monitoring instruments, inspection and evaluation of hazards during an emergency event;
 Yes No N/A RMK#
 b. safe use of control equipment, emergency communication procedures and alarm systems, shutdown procedures, and techniques of coordination with other employees and outside responders and agencies.
 Yes No N/A RMK#

* documentation?
 1st time #10.
 as reviewed?
 Ask CB

10. Is the Training Director or designee of the Training Director reviewing the Training Plan, at a minimum, annually to determine any changes that may require a modification of the Training Plan?
 Yes No N/A RMK#
Completed prior to annual compliance training for WTI employer Dec + Jan most recent 2007 2008

Space out →

11. Are all employees categorized as hazardous waste responders receiving Hazardous Waste Management Introductory Training?
 Yes No N/A RMK#
 At a minimum are they being trained initially and on an annual basis for the following?

a. Overview of facility and operations which includes: site security, controlled entry; waste profile system, prohibited/restricted waste; waste arrival and waste unloading; description of waste and hazardous waste materials being managed; sampling, laboratory activities; container, bulk waste, tank storage areas; processing and handling of waste; incineration process (equipment train); and off-site disposal of residues or other waste.
 Yes No N/A RMK#

b. RCRA - types of hazardous waste (listed, characteristic); generator requirements and compliance; TSDF requirements and compliance; record keeping and reporting requirements.
 Yes No N/A RMK#

c. Facility operations - general chemistry; security; inspections; manifesting; processing/ incineration; and sampling.
 Yes No N/A RMK#

* 10. Documentation:
 Last time reviewed & by whom?:
 See #10 above



Initial 40 hr fire brigade training Fire class in Feb

40 hr haywopper responder vs ER fire fighter

Service techs { Don Collins^{IM}
Bill Bell^{only! reading ERT}
Galf Staley^{IM}

Everyone hired prior to Feb 2008 who needed fire training got it in Feb 2008

IM Industrial Maintenance } ~~don't need~~ ARE NOT ERT for fires or explosives
all 40 hr - Haywopper trained

- Rob
- Leon
- Kevin

- Joe
- Jill

State Certified Fire instructors

2007 { March
May
July
Sept
Oct
April 2008
May 14, 2008

Haywopper Instructor training
Train the trainer

Train on ~5 SOPs each quarter + actual conduct drills of SOP by ~~con~~ simulating an incident, e.g. the truck at the front gate Oct 2007
Each crew is trained 1x/yr. it is mandatory + if they miss, they have to make it up during next scenario



2008
Jeff Hall
pn

PERSONNEL TRAINING

d. Emergency Response training - first aid and CPR; structural fire fighting; general contingency plan review; 40 hr Hazwoper -- technician level; activation of emergency response organization; classification of emergency incidents; command and control of emergency incidents; PPE; air monitoring; fire suppression methods; containment of fire suppression run off; emergency and monitoring equipment; waste feed cut-offs, communications and alarms; response to spills or releases.

Yes No N/A RMK#

REMARKS



REQUIRED EQUIPMENT

- 1. Is the Permittee, at a minimum, maintaining the equipment set forth in the approved contingency plan (Section G) at the facility? [Condition B.9.] Yes ___ No N/A ___ RMK#
- 2. Is the Permittee inspecting, testing and maintaining the equipment specified in Question #1 to assure its proper operation as specified in OAC rule 3745-54-33, the inspection plan (Section F) and Section G of the approved permit application? [Condition B.10.] 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 Section 7.4 of the approved permit application? [Condition B.11.] Yes No N/A ___ RMK#

N.Y. Mixed Infectious and Hazardous Waste spill kit with bleach in any form. REMARKS *no MITHS received yet - ok test*

- 1. Maintenance Bldg. Safety Area:
 - Only 2 of 3 SCBAs were in the Area*
- 2. BOP Storage:
 - No sand was in the Area.*
- 3. Safety Area in CPB:
 - Only 6 of 8 flush toilets were in the Room.*
- 4. First Aid Room:
 - Portable volatile organic detector (PID) none at the 2 were in the Room (said to be in use).*
- 5. Safety Trailer
 - only 5 of 10 non-sparking shoes in the trailer.*

REQUIRED AISLE SPACE

1. Is the Permittee maintaining aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility in an emergency as required by OAC Rule 3745-54-35, applicable sections of the approved Part B permit application, and terms and conditions of this permit?

Yes No N/A ___ RMK# /

2. Is the Permittee maintaining the required aisle space in permitted process and storage areas at the facility in accordance with Section D, Process Description, of the approved Part B permit application? For example:

Yes No N/A ___ RMK#

a. Five feet of aisle space in Building A (Drum Warehouse of the Container Processing Building);

Yes No ___ N/A ___ RMK#

b. Three feet of buffer zone between stored waste and process activities in Building B (External Truck Wash);

Yes No ___ N/A ___ RMK#

c. Two and one half (2 ½) feet between each row of pallets on the floor in Container Holding Building (Slag Canopy);

Yes No ___ N/A ___ RMK#

REMARKS

#1 this was a comment during fall 07 cei. We have been observing proper aisle space during the last 6 months. Not an issue.



STAGING REQUIREMENTS

1. Is the Permittee staging waste only in areas designated in Section D, e.g., areas with secondary containment, roofs or canopies, automated fire detection/suppression systems, etc?

Yes No N/A ___ RMK#

a. Is the Permittee abiding by permitted staging times as described in Section D and this permit (Condition C.14.(a) through (j))? A few examples are listed below.

Yes No N/A ___ RMK#

i. **Truck Hold and Sample area**, up to 3 days (Condition C.14.(a)).

Yes No N/A ___ RMK#

ii. **Container Processing Building (CPB)** - containers can be staged for up to 1 day (24 hrs) at the unloading docks and the receiving conveyors.

Yes No N/A ___ RMK#

iii. **CPB/Unloading Docks** - bulk waste and container trucks up to 3 days.

Yes No N/A ___ RMK#

iv. **CPB/Splitting Station Graveyard** - 14 days

1) Is the Permittee managing the containers in accordance with compatibility restrictions?

Yes No N/A ___ RMK#

2) Is the Permittee inspecting these containers daily? (Condition C.14.(b)(2))

Yes No N/A ___ RMK#

v. **CPB/Container Pump-Out Station** - 1 day

checks

Yes No N/A ___ RMK#



STAGING REQUIREMENTS

vi. **CPB/Queuing Lanes/Second Floor** – containers must be removed within 24 hours of initiating shutdown procedures during any outage greater than 72 hours. Has the Permittee abided by this permit condition?

Yes No N/A ___ RMK#

1) Is the Permittee inspecting these containers daily during the outage (Condition C.14.(b)(4)?

Yes No N/A ___ RMK#

noted
vii. **CPB/North Wall** – containers awaiting discrepancy resolution (not related to manifest discrepancies) and drums destined to pump-out have up to five days.

Yes No N/A ___ RMK#

b. Is the Permittee complying with notification agreements to the OEPA field office/on-site inspectors as described in Section D and this permit (Condition C.14)

Yes No N/A ___ RMK#

c. Does the Permittee ensure that containers of waste designated as 'direct feed, not to be stored', are processed within 24 hours of receipt at the facility? *in process"*

Yes No N/A ___ RMK#

d. Does the Permittee ensure that bulk containers are staged on-site only in areas designated for staging in Section D and this permit (Condition C.14).

Yes No N/A ___ RMK#

REMARKS

CONTINGENCY PLAN REQUIREMENTS

EMERGENCY PROCEDURES

1. In compliance with Condition B.13.(a) of the permit, does the Permittee make a diligent effort to:

a. Familiarize the emergency response agencies likely to respond to an emergency at the facility with: the layout of the facility, properties of hazardous waste managed at the facility and associated hazards, places where facility personnel will normally be working, entrances to and roads inside the facility, evacuation routes as depicted in Section G of the permit application?

Yes No N/A ___ RMK#

b. Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the facility, and any further requirements imposed by the permit? and

Yes No N/A ___ RMK#

c. Familiarize local ambulance services, fire departments, hospitals and any other local emergency services with the properties of hazardous waste managed at the facility and the types of injuries or illnesses which could result from fires, explosions or a release of hazardous wastes at the facility?

Yes No N/A ___ RMK#

d. Abide with the agreement between the Permittee and the City of East Liverpool Public Safety Forces regarding the primary emergency authority and support to the primary emergency authority. This agreement can be found in Section G.

Yes No N/A ___ RMK#

EMERGENCY AUTHORITIES

- 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 police departments, fire departments, hospitals, and local emergency response teams that may be called upon to provide emergency services? [Condition B.18.(b)] Yes No N/A ___ RMK#
- 4. Has the Permittee notified the agencies and local authorities in Question #3, in writing, within 10 days of the effective date of any amendments or revisions to the plan? [Condition B.13.(c)] Yes No N/A ___ RMK#
- 5. Has the Permittee submitted a copy of the approved contingency plan and all revisions, amendments and modifications to Ohio EPA's DERR in accordance with OAC rule 3745-54-53? [Condition B.18.(c)] Yes ___ No N/A ___ RMK#
Submitted to agency as reqd by req JM
- 6. Can the Permittee demonstrate that records of agreements and arrangements with local authorities are maintained as part of the facility's operating record? Yes No N/A ___ RMK#

EMERGENCY COORDINATOR

- 6. In accordance with OAC rule 3745-54-55, Condition B.19. of the permit and Section G of the permit application, is an emergency coordinator on premises or on call at all times? Yes No N/A ___ RMK#
- 7. In accordance with OAC rule 3745-54-55, Condition B.19. of the permit, and Section G of the permit application, is/are emergency coordinator(s) at the facility familiar with the following: contingency plan, facility layout, waste characterization and locations, and locations of all records in the facility? Yes No N/A ___ RMK#
- 8. 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? (Section G) Yes No N/A ___ RMK#



CONTENT OF CONTINGENCY PLAN

9. Does the Permittee have a contingency plan for the facility which contains the following elements as required by Condition B.15., OAC rule 3745-54-52, and Section G:

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

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?

Yes No N/A ___ RMK#

c. Includes an up-to-date list of names, addresses and phone numbers (office and home) of 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#

AMENDMENT OF PLAN

10. 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#



IMPLEMENTATION OF PLAN

11. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents at the facility since date of last inspection as described by Condition B.14. of the permit? If so, Yes No N/A RMK#
- a. Did the Permittee immediately implement the approved contingency plan and follow the emergency procedures described in OAC rule 3745-54-56? [Condition B.14.] Yes No N/A RMK#
- b. Did the Permittee collect and manage released material, liquid or solid material resulting from fire, explosion, or emergency response material, and by-products and evaluate to determine whether such material is hazardous waste in accordance with OAC Rule 3745-52-11? *NO DARRIS* Yes No N/A RMK#
- a. Did the Permittee manage the material as hazardous waste until such time as the Permittee demonstrated the waste is not hazardous in accordance with OAC rules 3745-51-03(C) and (D)? [Conditions B.14., B.16.] Yes No N/A RMK#
- c. Within 15 days of the incident did the Permittee submit, to the director, a written report of the incident? If so, *LATTER DUR FOR 5-5-08.* 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#
- d. 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? [Condition B.23.] Yes No N/A RMK#
- e. Does the Permittee's emergency response team assist and advise local community response organizations in response to transportation incidents involving hazardous wastes in transit to or from the facility when possible? [Condition B.20.(b)] *NO SUCH INCIDENTS.* Yes No N/A RMK#
12. Does the Permittee comply with the requirements set forth in OAC Rule 3745-54-56, all applicable sections of the approved Part B permit application, e.g., Section G, the contingency plan, and the conditions of this permit regarding emergency procedures? Yes No N/A RMK#

PLAN IMPLEMENTATION: 3-28-08 for fire in bulk solid waste tank 1502. 5-5-08 FIRE AT FRONT WALL.



Kevin

J.P.

CLOSURE REQUIREMENTS

GENERAL CLOSURE REQUIREMENTS

- 1. Is the Permittee maintaining at the facility, the approved closure plan which contains the elements set forth in OAC Rule 3745-55-12 and the approved Part B permit application, Section I? [Condition B.29.]
Yes No N/A ___ RMK#
- 2. Is the Permittee keeping at the facility included in Section I of the approved Part B permit application, the latest closure cost estimate as required by OAC Rule 3745-55-42? [Condition B.36.(a) and (d)]
Yes No ___ N/A ___ RMK#
- 3. Did the Permittee adjust the closure cost estimate for inflation within 60 days prior to the anniversary date of the establishment of the financial instrument used to comply with OAC Rule 3745-55-43 and Permit Condition B.39.
Yes No ___ N/A ___ RMK#
- 4. Did the Permittee submit to the Ohio EPA the latest closure cost estimate as required by OAC Rule 3745-55-42(D)?
Yes No ___ N/A ___ RMK#
- 5. Does the Permittee revise the closure cost estimate whenever there is a change in the facility's Closure Plan that increases the cost of closure, as required by OAC Rule 3745-55-42(C).
Yes No ___ N/A ___ RMK#

AMENDMENT OF CLOSURE PLAN

- 6. Has the Permittee amended the closure plan?
Yes No ___ N/A ___ RMK#
 - a. If so, has the plan been amended in accordance with OAC Rule 3745-55-12(C)? [Condition B.28.]
Yes No N/A ___ RMK#

REMARKS



CLOSURE PROCEDURES

- 7. Has the Permittee closed the facility? If so, Yes ___ No N/A ___ RMK#

- a. Was closure conducted in accordance with the closure performance standard of OAC rules 3745-55-10 through 3745-55-20 and 3745-57-90 through 3745-57-93 and the approved Part B permit application, [Condition B.26.] Yes ___ No N/A ___ RMK#

- b. After receiving the final volume of hazardous waste, did the Permittee remove from the facility 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#

- c. Has the Permittee decontaminated and/or disposed of all facility equipment, structures and soils as required by OAC rule 3745-55-14, the approved closure plan, and the approved Part B permit application? [Condition B.32.] Yes ___ No N/A ___ RMK#

- d. 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#

- e. Did an independent, qualified, registered professional engineer certify that each hazardous waste management unit or the facility was closed in accordance with the specifications in the approved closure plan and the terms and conditions of this permit as required by OAC Rule 3745-55-15? Yes ___ No ___ N/A ___ RMK#

- f. 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#



JP

CLOSURE PROCEDURES

8. Financial Assurance for Facility Closure. Does the Permittee maintain continuous compliance with OAC Rule 3745-55-43? [Condition B.37.]

Yes No N/A ___ RMK#

NOTE: *The Permittee shall provide documentation of financial assurance, which meets the requirements of OAC Rule 3745-55-51, in at least the amount of the cost estimates required by Permit Condition B.36.*

9. Liability Requirements. Does the Permittee maintain continuous compliance with the requirement of OAC Rule 3745-55-47? [Condition B.38.]

Yes No N/A ___ RMK#

NOTE: *The Permittee shall provide documentation of liability by providing liability coverage which meets the requirements of OAC Rule 3745-55-51 for sudden accidental occurrences in the amount required by the applicable rules, exclusive of the legal defense costs.*

REMARKS



TRANSPORTATION OF WASTE TO THE FACILITY

- 1. Does the Permittee use the Ohio River for transport of hazardous waste to the facility?
- 2. Does the Permittee advise all transporters in transit to the facility with hazardous waste shipments of the current weather, road, and traffic conditions on a continuing basis? [Condition B.41.(a)]
- 3. Does the Permittee use its best efforts to encourage transporters to use routes, as described in Section B of the approved Part B permit application and designated by WTI, in order to minimize the risk of transportation related incidents? [Condition B.41.(b)]

not permitted for river transp
Yes No N/A RMK#

Yes No N/A RMK #

Yes No N/A RMK#

REMARKS

TRANSPORTATION OF HAZARDOUS WASTE BY THE PERMITTEE

- 1. Does the Permittee have a current permit from the public utilities commission of Ohio in accordance with OAC Rule 3745-53-11(A)?
- 2. Does the Permittee accept and handle hazardous waste in accordance with the manifest requirements as described in OAC Rule 3745-53-20?
 - a. Does the transporter only accept hazardous waste, in the state of Ohio, if the waste is accompanied by a manifest, signed in accordance with OAC Rule 3745-52-20?
 - b. Does the transporter return a signed copy of the manifest to the generator before leaving the generator's property?
 - c. Does the transporter ensure the manifest accompanies the hazardous waste?

not by WTI - under Heritage
Yes No N/A RMK# *licens*

under Heritage
Yes No N/A RMK#

Yes No N/A RMK#

Yes No N/A RMK#

Yes No N/A RMK#



Amy

INSPECTION OF RIVERBANK AND FILL MATERIAL

1. Does the Permittee follow the inspection schedules, procedures, and criteria for riverbank and fill as outlined in Section F of the approved Part B permit application?

Yes No N/A ___ RMK# ___

2. Does the Permittee conduct monitoring as outlined in the permit (Condition B.44)?

a. a **monthly** visual evaluation of the effects of erosion along the bank of the Ohio River adjacent to the facility.

Yes No N/A ___ RMK# ___

b. an inspection of the soil integrity in the area of the installed sheet metal pile wall through visual inspections and standard surveying techniques.

Yes No N/A ___ RMK# ___

c. surveying inspections conducted once every five years unless visual inspections indicate movement of the soils.

Yes No N/A ___ RMK# ___

3. Does the Permittee take corrective action as necessary to remediate any conditions detected through the inspection procedures in an expeditious manner?

Yes No N/A RMK# ___ *if so.*

4. Does the Permittee maintain all documentation (e.g. inspection records, survey results, etc.) as related to the monitoring, maintenance, and remediation of the riverbank and fill material?

Yes No N/A ___ RMK# ___



REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

1. Does the Permittee follow the procedures for handling ignitable, reactive and incompatible wastes set forth in the approved Part B permit application and OAC rule 3745-54-17? [Condition B.7.(a)] *NOT SINCE LAST CASE* Yes No N/A RMK#
2. Does the Permittee, where applicable, ensure that all wiring and electrical equipment at the facility meet the National Fire Prevention Association's standards for hazardous locations as published in "National Electric Code" National Fire Codes, 1985 Edition, Vol. 3, Chapter 5, Special Occupancies, Articles 500-503, pp. 176 through 189? [Condition B.7.(e)] Yes No N/A RMK#
3. Does the Permittee provide, and require the use of, spark proof tools during all operations involving the handling of all ignitable and/or reactive wastes (Condition B.7.(c))? Yes No N/A RMK#
4. Does the Permittee ensure that incompatible wastes are not placed in the same container?
a. Does the Permittee ensure that hazardous wastes are not placed in an unwashed container that previously held an incompatible waste or material
Yes No N/A RMK# *for #1*
5. Does the Permittee provide electrical grounding for all containers and tanks, and transport vehicles during all operations involving the handling of ignitable or reactive wastes? [Condition B.7.(b)] Yes No N/A RMK#
6. Does the Permittee ensure all containers are placed on pallets or equivalent devices to keep the bottom of the container above the paved surface so that in the event of a leak, spilled waste will flow freely to the collection sumps? Yes No N/A RMK#
7. Does the Permittee prohibit smoking and open flames in each area where ignitable, reactive, and/or incompatible hazardous wastes are managed, as well as other active areas on-site, and post appropriate signs? Yes No N/A RMK#



HAZARDOUS WASTE MANAGEMENT

CONTAINER MANAGEMENT AND STORAGE

1. From the time of the last inspection, has the Permittee stored more than 684,380 total gallons of containerized waste at any one time at the facility, in the container storage areas, waste staging areas, and waste processing areas? [Condition C.1.(a)]

Yes No N/A RMK#

- a. Has the Permittee complied with the designated Storage capacity limits for each of the permitted storage areas?
Building A – 510,000 gallons
Building B – 15,180 gallons
Building C – 13,200 gallons
Container Holding Building (slag canopy) – 100,000
Truck Hold and Sample – 46,000

Yes No N/A RMK#

NOTE: For the purposes of the capacity in Question #1, each container will be considered to be storing an amount equal to its capacity.

a. Does the Permittee store waste for more than one year in any storage area (Condition C.1)?

NOTE: The possible exception to this rule is described in permit condition. Yes No N/A RMK#

2. Does the Permittee ensure that all hazardous wastes are stored in containers that are in good condition, e.g., not leaking, over pressurized, badly contracted, severely rusted, or with apparent structural defects, e.g., badly dented or crimped?

Yes No N/A RMK# /

- a. If not, did the Permittee transfer the hazardous waste from such container to one that was in good condition or manage the waste in some other manner that complies with the requirements of the Ohio hazardous waste rules?

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? [Condition C.5.(b)]

Yes No N/A RMK#

NOTE: The provisions of Conditions C.1.(a) and C.2. do not apply to the Permittee's activities as a generator accumulating hazardous waste on-site for less than 90 days in compliance with OAC rule 3745-52-34(A).

#1 | observed bulging drums during walk - appropriate actions were taken



CONTAINER MANAGEMENT AND STORAGE

4. Does the Permittee ensure all containers are placed on pallets or equivalent devices to keep the bottom of the container above the paved surface so that in the event of a leak, spilled waste will flow freely to the collection sumps (Condition C.5.(e))? Yes No N/A ___ RMK#
5. Has the generator marked containers with the words "Hazardous Waste" [OAC rule 3745-52-34(A)(3)]? Yes No N/A ___ RMK#
6. Is the accumulation date on each container [OAC rule 3745-52-34(A)(2)]? Yes No N/A ___ RMK#
7. Is the Permittee using containers made of or lined with, materials which will not react with the hazardous waste to be stored? [Condition C.4. & OAC 3745-55-72] Yes No N/A ___ RMK#
8. Are containers holding hazardous waste always kept closed during storage, except when it is necessary to add or remove waste (Condition C.5.(b))? Yes No N/A ___ RMK#
9. Does the Permittee ensure all container storage is conducted within the approved permitted container storage units as described in Condition C.1 of the permit? [Condition C.5(a) and OAC 3745-55-73] Yes No N/A ___ RMK#
10. Does the Permittee ensure containers holding hazardous waste are not opened, handled, or stored in a manner which may rupture the container or cause it to leak? [Condition C.5.(b)] *SINCE LAST CBS* Yes No N/A RMK#
11. Does the Permittee ensure that all containers and inner liners used to hold organic hazardous wastes are destroyed at the facility by incineration in the rotary kiln unless the container is empty as defined in OAC rule 3745-51-07? Yes No N/A ___ RMK#
12. Does the Permittee manage facility generated or on-site generated lab-packed waste in accordance with the applicable storage requirements? [Condition C.5.(c)] Yes No N/A ___ RMK#
- a. Are lab pack containers transferred to processing and/or storage areas by the end of day shift they are generated? Yes No N/A ___ RMK#
- b. Are the containers labeled, covered (at a minimum, plastic covers with elastic bands), dated and placed on pallets? Yes No N/A ___ RMK#



CONTAINER MANAGEMENT AND STORAGE

13. If the lab packed waste is sent off-site for disposal, does the Permittee package the waste in drums containing absorbent material compatible with the waste in the container? [Condition C.5.(d)]
Yes No N/A RMK#
14. Does the Permittee maintain a containment system for the permitted container storage area in accordance with the plans and specifications in Section D of the Part B permit application? [Condition C.6.(a)]
Yes No N/A RMK#
- a. Are additional containment systems constructed and maintained in a similar manner as existing systems [Condition C.6.(a)]?
Yes No N/A RMK#
- b. Is information regarding design details and storm water management submitted to the Ohio EPA in the form of a permit modification in the event new containment systems are constructed [Condition C.6.(a)]?
Yes No N/A RMK#
15. Does the Permittee maintain the containment system as follows: [Condition C.6.(b)]
- a. The containment system is designed with sufficient capacity to contain 10% of the total volume of the containers or the volume of the largest container?
Yes No N/A RMK#
- b. The containment system is free of cracks and gaps and is sufficiently impervious to contain leaks and spills and accumulated precipitation until collected and material is detected and removed?
Yes No N/A RMK#
- c. Does the Permittee ensure that the coating utilized in lining the secondary containment system is compatible with each waste stored in the permitted container storage area?
Yes No N/A RMK#
- i) Is the chemically resistant lining on the base of the secondary containment in good repair?
Yes No N/A RMK#
- ii) Is the chemically resistant lining capable of withstanding any degrading effects imposed through initial and/or prolonged contact (e.g., 24 hours) with released waste materials [Condition C.6.(b)]?
Yes No N/A RMK#
- d. Did the Permittee install a separate secondary containment structure, within the existing containment structure, for hazardous waste deemed incompatible with the liner material [Condition C.6.(b)]?
Yes No N/A RMK#



16. Does the Permittee remove spilled or leaked waste or accumulated precipitation within 24 hours from the time the spilled and/or leaked waste is discovered to have reached the sump or collection area? [Condition C.6(c)]
 Yes No N/A RMK#
17. Does the Permittee inspect container storage areas in accordance with the approved inspection schedule contained in Section F, of the Part B permit application, to detect leaking containers and deterioration of containers and the containment system caused by corrosion and other factors? [Condition C.8.]
 Yes No N/A RMK#
18. Does the Permittee record the inspection described in #17 in the inspection log along with any remedial action taken? [Condition C.8.]
 Yes No N/A RMK#
19. On days when containerized wastes are added or removed to and/or from any of the permitted areas for storage, does the Permittee conduct an inspection as described in Section F of the approved Part B permit application and maintain the inspection results in the facility operating record? [Condition C.8.]
 Yes No N/A RMK#
20. Does the Permittee ensure that containers holding ignitable or reactive waste are located at least 50 feet (15 meters) from the facility's property line (Condition C.10.(a))?
 Yes No N/A RMK#
21. Does the Permittee take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and follow the storage and processing procedures specified in Section D of the approved Part B permit application and Permit Condition B.7 (Condition C.10.(b))?
 Yes No N/A RMK#
22. If the Permittee has closed the container storage area, did the Permittee:
- a. Remove all hazardous waste residues from the containment system in accordance with the procedures in the closure plan set forth in Appendix I-1 of the permit application? [Condition C.13.(a)]
 Yes No N/A RMK#
- b. If the Permittee demonstrated that not all contaminated soils can be practically removed or decontaminated, did the Permittee close the unit and perform post-closure care following a plan approved by the director? [Condition C.13.(b)]
 Yes No N/A RMK#

REMARKS



TANK STORAGE, TREATMENT, AND MANAGEMENT

Does the Permittee limit the storage of hazardous waste in tanks to the following, as required by Condition D of the VRA permit: Yes No N/A RMK#

Bulk Solid Waste Storage Tanks (pits):

1. Does the Permittee limit the volume of waste to each of the pits to 600 cubic yards? Yes No N/A RMK#
2. Does the Permittee restrict the following types of waste from the pits:
 - a. Hazardous waste carrying D002 Yes No N/A RMK#
 - b. Hazardous waste carrying D003 Yes No N/A RMK#
 - c. Free liquids Yes No N/A RMK#
3. Does the Permittee visually inspect the base of the pits for cracks, gaps, and/or deterioration at least annually? Yes No N/A RMK#
4. If any damage is observed, does the Permittee stop adding waste to the damaged pit and schedule repairs as soon as possible? Yes No N/A RMK#
5. Does the Permittee ensure one foot of freeboard is maintained from the ground level at the roll-up doors? Yes No N/A RMK#
6. If the presence of any free liquid is observed during transfer of waste to the pits, is off-loading stopped and does the Permittee follow the procedures outlined in Section D of the approved Part B permit application? Yes No N/A RMK#

NONE SINCE LAST C.E.I.

REMARKS



TANK STORAGE, TREATMENT, AND MANAGEMENT

Organic Waste Tanks (Storage and Blending) CONTAINMENT

1. Does the Permittee maintain a containment system for the permitted tank storage areas in accordance with the plans and specifications in Section D of the Part B permit application and the permit and the tank manufacturer? [Condition D.(A)]
Yes No N/A ___ RMK#
2. Is the containment system designed with sufficient capacity to contain 10% of the total volume of the containers or the volume of the largest container?
Yes No N/A ___ RMK#
3. Is the containment system free of cracks and gaps and sufficiently impervious to contain leaks and spills and accumulated precipitation until collected and material is detected and removed?
Yes No N/A ___ RMK#
4. Does the Permittee ensure the coating utilized in lining the secondary containment system is compatible with each waste stored in the permitted container storage area?
Yes No N/A ___ RMK#
5. Did the Permittee provide the containment system with an adequate roof, walls, and berms to prevent run-on into the containment system from spills, releases, and/or precipitation events?
Yes No N/A ___ RMK#
6. Does the Permittee manage all material removed from the collection system that is a hazardous waste as a hazardous waste?
Yes No N/A ___ RMK#

REMARKS



TANK STORAGE, TREATMENT, AND MANAGEMENT

BLENDING AND TREATMENT

1. Are all tanks used to store and/or blend hazardous waste designed and constructed in accordance with the appropriate standards and requirements from all applicable, accredited, organizations such as the American Society of Mechanical Engineers (ASME) and the American Petroleum Institute (API) and OAC Rule 3745-55-92(B)?
Yes No N/A RMK#
2. When blending activities are conducted in any of the tanks, does the Permittee perform compatibility testing prior to combining the waste in accordance with Section C of the approved Part B permit application?
Yes No N/A RMK#
3. Does the Permittee ensure each tank is equipped with safety devices and equipment as described in the permit and Section D of the approved Part B permit application? For example, level and temperature alarms, safety cutoffs, and pressure and vacuum relief safety devices? [Condition D.4.(c)]
Yes No N/A RMK#
4. Does the Permittee inspect the tanks in accordance with the inspection frequency recorded in Section F of the approved Part B permit application? [Condition D.5.]
Yes No N/A RMK#
5. Does the Permittee monitor tank (shell) wall thickness of each tank where applicable in accordance to design and construction codes and industry practices? [Condition D.5.(e)]
Yes No N/A RMK#
 - a. Are the tanks monitored and tested with a frequency as required by the permit and the approved Part B permit application?
Yes No N/A RMK#
 - b. Are tanks replaced or repaired when tank wall thickness has been reduced to the minimum design shell thickness required?
Yes No N/A RMK#
6. Does the Permittee ensure that the tanks are not overfilled and are equipped with automatic shut off and/or high level warning devices to prevent overfilling?
Yes No N/A RMK#
7. Has a leak or spill occurred in the tank system within the last six months?
Yes No N/A RMK#
 - a. If so, did the Permittee comply with the requirements of OAC Rule 3745-55-96, Condition D.6., and Section G of the approved Part B permit application?
Yes No N/A RMK#

#1 Spoke to Kevin - WS in July (sched for repair) + Caustic will be addressed. Get with CB for schedule/commitment



TANK STORAGE, TREATMENT, AND MANAGEMENT

BLENDING AND TREATMENT

8. Does the Permittee ensure that incompatible wastes are not placed in the same pipe or tank? [Condition D.10.]
Yes No N/A ___ RMK#
9. *SINCE LAST CRI*
Does the Permittee ensure that hazardous waste are not placed in an unwashed pipe or tank that previously held an incompatible waste or material, unless the Permittee complies with OAC 3745-54-17? [Condition D.10]
Yes No N/A ___ RMK#
10. Does the Permittee ensure that ignitable or reactive wastes are placed only in tanks that: [Condition D.9]
- a. Maintain a nitrogen blanket over volatile organic waste sufficient to prevent air intrusion and maintain internal tank atmosphere under the lower explosive limit:
Yes No N/A ___ RMK#
- b. Are equipped with a vent emission control system which collects vapors during normal operations and conveys them to be thermally destroyed by incineration or to be treated by the Regenerable Activated Carbon Adsorption Cleaning System?
Yes No N/A ___ RMK#
- NOTE:** Under abnormal conditions, such as when pressures in the tank(s) rise above a pre-determined set point, the tank farm by-pass system will activate as described in Section D.
- c. Are equipped with flame arresters or equivalent devices as described in Section D?
Yes No N/A ___ RMK#
11. **Direct Drum Pump-Out Unit**
- a. Does the Permittee operate this unit in compliance with the requirements found in Section D, e.g., limit the number of containers to four pallets of compatible material and staging prohibited beyond 24 hours?
Yes No N/A ___ RMK#
12. **Direct Organic Tanker Unloading Units**
- a. Does the Permittee ensure the scales used to measure feed rates to the incinerator are maintained, operating accurately, and inspected in accordance to Section F?
Yes No N/A ___ RMK#



CORRECTIVE ACTION

1. Has the Permittee submitted the progress reports in accordance with corrective action requirements? [Condition E.] Yes No N/A RMK#
2. Has the Permittee submitted an application for a Class 3 permit modification under OAC Rule 3745-50-51 to terminate the corrective action tasks of the Schedule of Compliance? Yes No N/A RMK#
not yet - will soon
3. Has the Permittee identified any new WMUs or releases at the facility? [Condition E.10.] Yes No N/A RMK#
- a. If so, did the Permittee follow the steps indicated in Conditions E.10.(a) and E.10.(b)? Yes No N/A RMK#

REMARKS



GROUND WATER MONITORING

1. Has the Permittee conducted semi-annual sampling of their monitoring wells in accordance with the requirements set forth in the approved Ground Water Monitoring Plan, Attachment 6 to the permit, and all subsequent revisions and modifications to the plan? *[Condition B.43.]*

Yes No N/A ___ RMK#

a. Have the results been submitted in a timely manner and in accordance with the Ground Water Monitoring Plan?

Yes No N/A ___ RMK#

NOTE: The permit does not specify the months in which the sampling must occur. The schedule in the past has been sampling in January and July with the Supplemental Annual Ground Water Report being submitted in February

2. Has the Permittee submitted the supplemental annual report as required by the Ground Water Monitoring Plan?

Yes No ___ N/A ___ RMK#

NOTE: The permit does not specify the month in which the report must be submitted. The schedule in the past has been the Supplemental Annual Ground Water Report being submitted in February.

3. Has the Permittee conducted its detection monitoring program for compliance with OAC Rules 3745-54-90 through 3745-54-101?

Yes No N/A ___ RMK#

4. Has the Permittee responded to comments or questions regarding compliance with the Ground Water Monitoring Program submitted by the Ohio EPA in a timely manner?

Yes No N/A ___ RMK#

5. Has the Permittee maintained the Ground Water Monitoring results as part of the facility's operating record?

Yes No N/A ___ RMK#

REMARKS



SOLID OR SEMI-SOLID WASTE GENERATED BY THE PERMITTEE

1. Does the Permittee manage the solid and semi-solid wastes generated at the facility as hazardous wastes until they are specifically delisted? [Condition I(A).10] Yes No N/A ___ RMK#
2. Does the Permittee manage the treatment residue generated from the incineration system in accordance with procedures outlined in Section D of the approved Part B permit application and all applicable Ohio hazardous waste regulations? [Condition I(A).10] Yes No N/A ___ RMK#
3. Does the Permittee sample and analyze the treatment residues generated by the facility in accordance with Section C of the approved Part B permit application? [Condition B.43. and Condition I(A).10] Yes No N/A ___ RMK#
4. Has any of the waste generated by the Permittee and analyzed in accordance with Section C, failed to meet LDR standards within the last six month? Yes No ___ N/A ___ RMK#

If so, please describe the situation, including how many containers failed, why they failed (if known), and the corrective action taken by the Permittee.

~~and~~ slag - sometimes fails for metals - sent out for stabilization

5. Does the Permittee ensure disposal, of solid or semi-solid wastes that it generates, at a facility authorized, i.e., permitted to dispose of such wastes? Yes No N/A ___ RMK#
6. Has any of the waste generated by the Permittee and transported off-site to a disposal facility, failed acceptance criteria at the facility? Yes No N/A ___ RMK#

~~no~~ no "box" at uc

If so, what actions did the Permittee take?

7. Has the Permittee/generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the Director? [OAC 3745-52-34] Yes No N/A ___ RMK#

REMARKS

extension letter filed at OCHA



INCINERATION

1. Is the Permittee maintaining a destruction removal efficiency (DRE) of 99.99% for each POHC tested? Yes No N/A ___ RMK#
2. Is the Permittee maintaining a negative pressure in the secondary combustion chamber (SCC) to prevent fugitive emissions? [Condition I(A).1(b)] Yes No N/A ___ RMK#
3. *if not - opted under Title V requirements (in 2008 - 3 or 4/mo)*
Is the Permittee maintaining the required temperature of the spray dryer outlet /electrostatic precipitator (ESP) inlet temperature, as a control for dioxin/furan formation? [Condition I(A).1(b)] Yes No N/A ___ RMK#
4. Is the Permittee maintaining the carbon feed rate to the enhanced carbon injection system (ECIS) which collects dioxin/furan formed during the incineration process? [Condition I(A).1(b)] Yes No ___ N/A ___ RMK#
5. Does the Permittee adhere to the annual metal feed limits as described in Attachment 2 of the RCRA Permit? Yes No ___ N/A ___ RMK#
6. Does the Permittee only incinerate hazardous wastes as identified in Permit Condition I(A).2. and subject to Permit Conditions I(A).3 through I(A).5, and I(A).8?
 - a. Compressed gases and gas mixtures approved for treatment by incineration including gases used as propellant in aerosol cans and compressed gaseous waste streams listed in Section C. Yes No N/A ___ RMK#
 - b. Waste containing polychlorinated biphenyls (PCBs) ~~in excess of 50 ppm~~ ^{and} waste that is ~~or was at one time~~ ^{never been} regulated by TSCA, 40 CFR 761? *less than* Yes No N/A ___ RMK#
 - c. Dioxin bearing waste requiring treatment technology achieving 99.99% DRE and assigned hazardous waste codes F020 through F023, F026, and F027. *not worded right* Yes No N/A ___ RMK#
 - d. Infectious wastes *no* Yes ___ No N/A ___ RMK#
 - e. Chemical warfare agents (CWA) and other chemical weapons or debris generated from the manufacture and/or cleanup of CWAs. *no* Yes ___ No N/A ___ RMK#
 - f. Radioactive wastes *(not above bkg)* *no* Yes ___ No N/A ___ RMK#
 - g. Other prohibited wastes as described in Section C. *no* Yes ___ No N/A ___ RMK#

REMARKS



INCINERATION

7. Does the Permittee maintain the waste feed cut-off (WFCO) system to terminate waste feed to the incineration system when a triggering event occurs? [Condition I(A).1(c)]

Yes No N/A ___ RMK#

a. Is the WFCO system tested weekly in accordance with Attachment 1 of the RCRA Permit?

Yes No N/A ___ RMK#

8. Does the Permittee adhere to the restrictions for the treatment of waste that are required to meet LDR treatment standards for dioxins and furans, such as F032, F039, K043, and/or K099? [Condition I(A).2]

Yes No N/A ___ RMK#

9. Does the Permittee ensure that waste is not fed to the SCC? [Condition I(A).2]

Yes No N/A ___ RMK#

10. Does the Permittee determine the composition and heat value of any auxiliary fuel used in the incineration of any hazardous waste, during start-up and shut down procedures, and during upset condition?

Yes No ___ N/A ___ RMK#

NOTE: The Permittee may use high BTU hazardous waste, but only if it contains EPA waste code D001 and waste analysis is performed to demonstrate the waste contains no other hazardous constituents listed in the appendix to OAC Rule 3745-51-11.

Does the Permittee adhere to the annual metal feed limits as described in Attachment 2 of the RCRA Permit and ensure the limits are not exceeded?

Yes No ___ N/A ___ RMK#

a. Does the Permittee monitor the feed rates of the metals listed in Attachment 2 of the RCRA Permit?

Yes ___ No ___ N/A ___ RMK#

b. Are the results of the monitoring recorded in the facility's operating record?

Yes No ___ N/A ___ RMK#

12. Does the Permittee inspect the incinerator and associated equipment in accordance with Section F?[Condition I(A).4]

Yes No ___ N/A ___ RMK#

REMARKS

dup
dup
dup



INCINERATION - TESTING

13. Does the Permittee test the performance of the incineration system to demonstrate the continued dioxin/furan control using the test protocols employed during the October 2002 testing event or the approved MACT CPT Plan or an equivalent test plan as specifically approved by Ohio EPA? [Condition I(A).3.(h)]

Yes No N/A ___ RMK#

a. Is the performance evaluated in accordance to Permit Condition I(A).3.(h)(ii)?

Yes No N/A ___ RMK#

*at PN
D. case*

14. Does the Permittee test the incineration system as directed by the Ohio EP, to verify that the operating requirements established in the RCRA permit result in compliance with Attachment 2 to the permit and all applicable sections of the permit and the approved Part B permit application? *CPT*

Yes No ___ N/A ___ RMK#

15. Does the Permittee test the incineration system to determine whether amendment of the ~~performance standards~~ *performance standards* contained in the permit or additions thereto, is indicated as necessary? *OPCS*

Yes No ___ N/A ___ RMK#

16. At a minimum, does the Permittee test the incineration system for the performance standards in the permit at a frequency required by the MACT standards and listed in the Clean Air Act Title V Permit?

Yes No ___ N/A ___ RMK#

17. Does the Permittee install, test, operate, and maintain all instrumentation and controls including all associated instrument loops, monitors, analyzers, alarms, and the distributed control system (DCS), in accordance with the design plans, performance specifications, and maintenance procedures prior to, and while, treating hazardous waste in the incineration system? [Condition I(A).3.(c)]

Yes No ___ N/A ___ RMK#

REMARKS



INCINERATION – ECIS, PLUM SUPPRESSION, START-UP/SHUT-DOWN

18. Does the Permittee operate the enhanced carbon injection system (ECIS) in accordance to Permit Condition I(A).3.(r)?
- Yes No N/A ___ RMK#
- a. It must be operating at all time waste is in the incineration system.
- Yes No N/A ___ RMK#
- b. It is monitored, recorded, and tested in accordance with Attachments 1 and 3 to the RCRA Permit.
- Yes No ___ N/A ___ RMK#
- c. *weight fed* The activated carbon feed system for the ECIS *is* calibrated monthly.
- Yes No ___ N/A ___ RMK#
- d. The result of the calibration recorded in the facility's operating record.
- Yes No N/A ___ RMK#
- e. The carbon feed rates at the two injection points are at or above the rates demonstrated during the CPT/Trial Burn conducted in September 2003 (Condition 1) and December 2003 (Condition 2). The feed rate is an average of the feed rate demonstrated by the two tests mentioned above.
- Yes No ___ N/A ___ RMK#
19. Does the Permittee ensure the plume suppression system ~~or reheat fan~~ is operating continuously while waste is in the incineration system, except during maintenance? [Condition I(A).(v)]
- yes* Yes No ___ N/A ___ RMK#
- a. *plume suppression less than 24, less than 5 x a yr* If the system is shut down for periods greater than 24 hours or more often than ten times during the calendar year while burning hazardous waste, does the Permittee request written authorization from the Ohio EPA?
- record* Yes No ___ N/A ___ RMK#
- b. Does the Permittee ensure the plume suppression system reheat fan is monitored, recorded, and tested in accordance with Attachments 1 and 3 in the RCRA permit?
- WTI hasn't done this* Yes No ___ N/A ___ RMK#
20. With regard to Start-Up and Shut-down, does the Permittee comply with the requirements of OAC Rule 3745-57-45(C) and Condition I(A).3.(w)?
- Yes No ___ N/A ___ RMK#
- a. Is the incinerator system inspected thoroughly prior to each start-up?
- Yes No ___ N/A ___ RMK#
- b. Does the Permittee ensure that shutdown procedures begin with the termination of waste feed to the system?
- Yes No ___ N/A ___ RMK#

REMARKS



INCINERATION – MODIFICATIONS AND INSPECTIONS

21. Has the Permittee a submitted permit modification request to the Ohio EPA for changes to the incineration system, associated heat recovery or flue gas cleaning equipment, or operation procedures as detailed in the RCRA permit or the approved Part B permit application which would affect the achievement of the performance standards contained in Permit Condition I(A).3, or any other permit conditions? [Condition I(A).3.(y)] Yes No N/A RMK#
22. Does the Permittee conduct regular and timely inspections of the facility and its operations in accordance with Section F and all applicable permit conditions? [Condition I(A).4. Inspections]
- a. Does the Permittee record all inspection data and incorporate within the operating record? Yes No N/A RMK#
- b. Does the Permittee thoroughly, visually inspect the integrity of the secondary containment, roadways, containment sumps in the storm water collection "B" and "C" areas, and the security fence at a frequency outlined in Section F of the approved Part B permit application? Yes No N/A RMK#
- c. Does the Permittee ensure the plume suppression system reheat fan is monitored, recorded, and tested in accordance with Attachments 1 and 3 in the RCRA permit? Yes No N/A RMK#
- b. Does the Permittee continually monitor the distributed control system (DCS) including the analyzers, monitors, temperature probes, scales, micro-motion meters, alarms, etc., for proper operation and recording of data? Yes No N/A RMK#
- e. Does the Permittee test the emergency response equipment and communications in accordance with Section F of the approved Part B permit application? Yes No N/A RMK#
- f. Does the Permittee maintain all inspection records in the operating log in accordance with OAC Rule 3745-54-73? Yes No N/A RMK#

REMARKS



INCINERATION – MONITORING REQUIREMENTS AND REGENERABLE ACTIVATED CARBON ADSORPTION CLEANING SYSTEM

23. Does the Permittee maintain, calibrate, and operate monitoring equipment at all times while incinerating hazardous waste as specified in the approved Part B permit application, Attachment 3, and the terms and conditions, of the RCRA permit? [Condition I(A).5.] Yes No N/A RMK#

a. Does the Permittee record the monitoring equipment data while incinerating hazardous waste for all materials fed to the incineration system? Yes No N/A RMK#

b. Does the Permittee maintain all monitoring data recorded in the operating log in accordance with OAC Rule 3745-54-73? [Condition I(A).8.] Yes No N/A RMK#

c. Has the Ohio EPA requested sampling and analysis of the waste and exhaust emissions to verify that the operating requirements established in the RCRA permit are being met? [Condition I(A).5.(c)] Yes No N/A RMK#

24. Does the Permittee maintain the re-generable activated carbon adsorption cleaning system so as to remove, at a minimum, 95% of the total organic vapors from the exhaust gas prior to being discharged from the system to the atmosphere and in accordance with the terms and conditions of the RCRA permit and Section D of the approved Part B permit application? [Condition I(A).9.] *per consent order w/ USEPA* Yes No N/A RMK#

a. Does the Permittee replace the carbon boxes in accordance with Section D? *Consent order - Sept 2006 mod + Feb 2007 mod* Yes No N/A RMK#

b. Does the Permittee maintain a record of the replacement history in the facility's operating log? [Condition I(A).9.(a)] Yes No N/A RMK#

REMARKS

D matches consent order long (Sept 06 + Feb 07 mod)



TREATMENT IN MISCELLANEOUS UNITS

Currently, the Extruder is the only miscellaneous unit operating.

1. Does the Permittee operate the extruder as specified in Section D of the approved Part B permit application and the terms and conditions of the RCRA permit? [Condition F.] Yes No N/A RMK#
 - a. Operates at a maximum rate of 18,000 lbs./hour? Yes No N/A RMK#
 - b. Has secondary containment, automated fire detection and suppression, safety cutoffs, bypass systems, and pressure controls in place and operating properly? Yes No N/A RMK#
 - c. Operates with a continuous nitrogen blanket to maintain an inert atmosphere within the unit? Yes No N/A RMK#
2. Does the Permittee restrict from treatment in the miscellaneous units those wastes described in the RCRA permit and Section C of the approved Part B permit application as prohibited/restricted? Yes No N/A RMK#
3. Does the Permittee inspect the miscellaneous units daily in accordance with Section F of the approved Part B permit application? [Condition F.7.] *When in use* Yes No N/A RMK#
 - a. Are the inspection records maintained in the facility's operating log? Yes No N/A RMK#
4. In the case of a leak or spill associated with any of the miscellaneous units, did the Permittee respond in accordance with Section G of the approved Part B permit application and Condition F.8.? For example: *They would, if they had a spill* Yes No N/A RMK#
 - a. Did the Permittee immediately stop the flow of hazardous waste and conduct an inspection to determine the cause of the release? Yes No N/A RMK#
 - b. Did the Permittee remove the waste from the unit or secondary containment system within 24 hours of detection of the leak? Yes No N/A RMK#
5. Does the Permittee ensure no reactive waste is processed through the extruder? [Condition F.9.(a)] Yes No N/A RMK#
6. Does the Permittee ensure incompatible waste is not placed in the same unit or placed in a unit that previously held an incompatible waste or material unless in accordance with OAC Rule 3745-55-99? [Condition F.9.(b)] Yes No N/A RMK#

REMARKS



LAND DISPOSAL RESTRICTION REQUIREMENTS

PROHIBITION AGAINST DILUTION

- 1. Does the Permittee dilute a restricted waste or a treatment residue from a restricted waste? [OAC Rule 3745-270-03]
 - a. As a substitute for adequate treatment to achieve compliance with LDR treatment standards? Yes No N/A RMK
 - b. To circumvent the effective date of a prohibition (e.g., to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)? Yes No N/A RMK
 - c. To otherwise avoid a prohibition in OAC Rules 3745-270-30 through 3745-270-39? Yes No N/A RMK
 - d. To other wise avoid a prohibition imposed by Section 3004 of RCRA? Yes No N/A RMK

NOTE: If the answer to any of the Questions 1(a) through 1(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of OAC rule 3745-270-03.

Dilution of wastes is permissible under some conditions. See OAC rule 3745-270-03(B) (40 CFR 268.3).

WASTE EVALUATION REQUIREMENTS

- 2. Has the Permittee adequately evaluated all wastes to determine if they are restricted from land disposal? [OAC rule 3745-270-07(A)] Yes No N/A RMK#
 - a. **For determinations based solely on knowledge of the waste:** Is supporting data used to make this determination being retained on-site? [OAC rule 3745-270-07(A)(6); Condition B.40.(a)] Yes No N/A RMK#
 - b. **For determinations based upon analytical testing:** Is a copy of waste analysis data being retained on-site? [OAC rule 3745-270-07(A)(6)] Yes No N/A RMK#

* See LDR Checklist (10 pages) - also completed during this cei by *Michelle* referred to that checklist to complete this one, & interviewed WTI



LAND DISPOSAL RESTRICTION REQUIREMENTS

3. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g., wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [OAC rule 3745-270-07(A)] Yes No N/A ___ RMK#
4. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [OAC rule 3745-270-07(A)] Yes No N/A ___ RMK#
5. Does the entity generate any listed waste(s) which are restricted from land disposal? If so, *kiln brick* Yes No ___ N/A ___ RMK#
- a. Do such wastes also exhibit hazardous waste characteristics as identified in OAC rules 3745-51-20 to 3745-51-24? Yes No ___ N/A ___ RMK#
- b. For listed wastes which also exhibit a characteristic: Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [OAC rule 3745-270-09(A)] Yes No N/A ___ RMK#

NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC rule 3745-270-09(B)]

NOTIFICATION/CERTIFICATION

6. **For wastes that do not meet treatment standards:** Has the generator submitted a one-time written notice to the treatment/storage facility receiving the wastes, in writing, that wastes being received do not meet treatment standards? [OAC rule 3745-270-07(A)(2)] *send WR w/ all* Yes No N/A ___ RMK#
- If so, does the notification include the following:
- a. EPA hazardous waste number? [OAC rule 3745-270-07(A)(2)] Yes No N/A ___ RMK#
- b. Appropriate treatment standard for the waste? [OAC rule 3745-270-07(A)(2)] Yes No N/A ___ RMK#
- c. The manifest number associated with the shipment of waste? [OAC rule 3745-270-07(A)(2)] Yes No N/A ___ RMK#
- d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(2)] Yes No N/A ___ RMK#



LAND DISPOSAL RESTRICTION REQUIREMENTS

e. Applicable wastewater/non-wastewater category [OAC rule 3745-270-07(A)(3)]

Yes No N/A ___ RMK#

f. For hazardous debris, list the contaminants subject to treatment, as described in paragraph (B) of OAC rule 3745-270-45; and an indication that these contaminants are being treated to comply with OAC rule 3745-270-45.

Yes No N/A ___ RMK#

g. For contaminated soil list the constituents subject to treatment as described in paragraph (D) of OAC rule 3745-270-49, and the following statement:
This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards.

Yes No N/A ___ RMK#

7. **For wastes that meet treatment standards:** Has the generator submitted a one-time written notice and certification to the treatment, storage or disposal facility receiving the wastes stating waste being received meet applicable treatment standards? [OAC rule 3745-270-07(A)(3)]

Yes No N/A ___ RMK#

If so, does the notice/certification include the following:

a. EPA hazardous waste number? [OAC rule 3745-270-07(A)(3)]

Yes No N/A ___ RMK#

b. The corresponding treatment standards and applicable prohibitions for the waste? [OAC rule 3745-270-07(A)(3)]

Yes No N/A ___ RMK#

c. The manifest number associated with the shipment of waste? [OAC rule 3745-270-07(A)(3)]

Yes No N/A ___ RMK#

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(3)]

Yes No N/A ___ RMK#



LAND DISPOSAL RESTRICTION REQUIREMENTS

e. Is the certification signed by the generator or an authorized representative? [OAC rule 3745-270-07(A)(2)]

Yes No N/A RMK#

f. For contaminated soil list the constituents subject to treatment as described in paragraph (D) of OAC rule 3745-270-49, and the following statement:
This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards.

Yes No N/A RMK#

8. Does the Permittee retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years? [OAC rule 3745-270-07(A)(8)]

Yes No N/A RMK#

END OF PERMIT CONDITIONS

Heritage-WTI, Inc., CEI checklist draft_2008.wpd



Spring

2008

LARGE 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

GENERAL REQUIREMENTS

- 1. Has the LQUWH obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)] Yes No N/A RMK#

PROHIBITIONS

- 2. Did the LQUWH dispose of universal waste? [3845-273-31(A)] Yes No N/A RMK#
- 3. Did the LQUWH dilute or treat universal waste, except when responding to releases or by managing specific wastes as provided in OAC 3745-273-33? [3745-273-31(B)] Yes No N/A RMK#

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES:

- 4. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)] Yes No N/A RMK#
- 5. If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? Yes No N/A RMK#
- 6. Does the LQUWH conduct any of the following activities:
 - a. Sort batteries by type? *MAYBE OCCASIONALLY* Yes No N/A RMK#
e.g. H.H.W.
 - b. Mix battery types in one container? Yes No N/A RMK#
 - c. Discharge batteries to remove the electric charge? *REQUEST THAT CUSTOMER DISCHARGE BATTERIES* Yes No N/A RMK#
 - d. Regenerate 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)? [3745-273-33(A)(2)]

Yes No N/A RMK#

7. If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)(3)]

Yes No N/A RMK#

a. If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)]

Yes No N/A RMK#

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)]

Yes No N/A RMK#

8. Are the battery(ies) or container(s) of batteries located with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-34(A)]

Yes No N/A RMK#

UNIVERSAL WASTE PESTICIDES ~~PROBABLY NOT RETURNED~~

9. Does the LQUWH 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? [3745-273-33(B)(1)]

Yes No N/A RMK#

10. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-33(B)(2)]

Yes No N/A RMK#

11. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 66-101, except for paragraph (C) of 3745-66-97; rule 3745-66-100 and 3745-66-101 of the OAC met? [3745-273-33(B)(3)] *met as HU on site*

Yes No N/A RMK#

12. If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-33(B)(4)]

Yes No N/A RMK#

13. Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides"? [3745-273-34(B)(1)&(2)]

Yes No N/A RMK#

met as HU on site



14. Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)]
- Yes No N/A RMK#

UNIVERSAL WASTE THERMOSTATS *CB reviews outbound manifests - haven't sent any out lately since last year*

15. Are thermostats that show evidence of leakage, spillage or damage that could cause leaks, properly contained? [3745-273-33(C)(1)]
- Yes No N/A RMK#

16. 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? [3745-273-33(C)(1)]
- Yes No N/A RMK#

17. If the mercury-containing ampules are removed, does the LQUWH: [3745-273-33(C)(2)]

- a. Remove the ampules in a manner to prevent breakage and is the removal done over a containment device? [3745-273-33(C)(2)(a)(b)]
- Yes No N/A RMK#

- b. Have a clean-up system readily available to transfer spilled material to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-33(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? [3745-273-33(C)(2)(e)]
- Yes No N/A RMK#

- d. Ensure employees are thoroughly familiar with proper waste handling and emergency procedures? [3745-273-33(C)(2)(f)]
- Yes No N/A RMK#

- e. Ensure removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-33(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? [3745-273-33(C)(2)(h)]
- Yes No N/A RMK#



18. If mercury or clean-up residues resulting from spills or leaks or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-33(C)(3)(a)]

Yes ___ No N/A 1 RMK# ___

a. If the waste is characteristic, was it managed in compliance with 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*) [3745-273-33(C)(3)(b)]

Yes ___ No N/A ___ RMK# ___

b. If the mercury, residues and/or other waste are not hazardous, are they managed in compliance with applicable law? [3745-273-33(C)(3)(c)]

Yes ___ No N/A ___ RMK# ___

19. Are the thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)" [3745-273-34(D)]

Yes ___ No N/A RMK# ___

UNIVERSAL WASTE LAMPS

20. Does the LQUHW 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? [3745-273-33(D)(1)]

Yes No N/A ___ RMK# ___

21. 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 constituents to the environment? [3745-273-33(D)(2)]

Yes No N/A ___ RMK# ___



22. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamps?" [3745-273-34(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

23. Is the waste accumulated for less than one year? [3745-273-35(A)]

Yes No N/A RMK#

a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on handler to demonstrate) [3745-273-35(B)]

Yes No N/A RMK#

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

24. Has the length of time the universal waste has been accumulated documented by one of the following: [3745-273-35(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? [3745-273-35(C)(1)]

Yes No N/A RMK#

b. Marking or labeling the individual item of universal waste with the date that it became a waste or was received? [3745-273-35(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? [3745-273-35(C)(3)]

Yes No N/A RMK#

profile data

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? [3745-273-35(C)(4)]

Yes No N/A RMK#



- e. Placing the universal waste in a specific accumulation area and identifying the earliest that any universal waste in the area became a waste or was received? [3745-273-35(C)(5)]
- 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 is received? [3745-273-35(C)(6)]

Yes No N/A RMK#

Yes No N/A RMK#

Auto data

EMPLOYEE TRAINING

25. Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36]

Yes No N/A RMK#

RESPONSE TO RELEASES

26. Were releases of universal waste and other residues immediately contained? [3745-273-37(A)]
27. Was the released material characterized? [3745-273-37(B)]
28. If the released material was a hazardous waste, was it managed as required in OAC 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) [3745-273-37(C)]

Yes No N/A RMK#

haven't had any

Yes No N/A RMK#

Yes No N/A RMK#

OFF-SITE SHIPMENTS

NOTE: *not a transporter anymore*
If a LQUWH self-transportes wastes, then the handler must comply with the Universal Waste transporter requirements.

29. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)]

Yes No N/A RMK#

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

30. 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? [3745-273-38(C)]

Yes No N/A RMK#



31. Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)]

Yes No N/A RMK#

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

Yes No N/A RMK#

a. Receive the waste back? [3745-273-38(E)(1)]

Yes No N/A RMK#

b. Agree to where shipment will be sent? [3745-273-38(E)(2)]

Yes No N/A RMK#

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

Yes No N/A RMK#

a. Sending the waste back to originating handler? [3745-273-38(F)(1)]

Yes No N/A RMK#

b. Sending the shipment to a destination facility? [3745-273-38(F)(2)]

Yes No N/A RMK#

34. If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)]

Yes No N/A RMK#

*hasn't happened -
what waste used*

35. If the handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-38(H)]

Yes No N/A RMK#



TRACKING UNIVERSAL WASTE SHIPMENTS

36. Are universal waste received from another handler? If so: Yes No N/A RMK#
- a. Is a record of each shipment kept? [3745-273-39(A)] Yes No N/A RMK#

NOTE: This record can be in the form of a log, invoice, manifest, bill of lading, or other shipping document. This also applies to question No. 35(a).

37. Does the record include the following:
- a. Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)] Yes No N/A RMK#
- b. Quantity of each type of universal waste? [3745-273-39(A)(2)] Yes No N/A RMK#
- c. Date received? [3745-273-39(A)(3)] Yes No N/A RMK#
38. Is universal waste shipped to another handler? If so: Yes No N/A RMK#
- a. Is a record of each shipment kept? [3745-273-39(B)] Yes No N/A RMK#

39. Does the record include the following?
- a. Name and address of universal waste handler, destination facility, or foreign destination? [3745-273-39(B)(1)] Yes No N/A RMK#
- b. Quantity of each type of universal waste? [3745-273-39(B)(2)] Yes No N/A RMK#
- c. Date shipped? [3745-273-39(B)(3)] Yes No N/A RMK#
40. Are records kept for three years? [3745-273-39(C)(1)(2)] Yes No N/A RMK#

EXPORTS

41. Is waste being sent to a foreign destination? If so: *not currently, but will in future* Yes No N/A RMK#
- a. Does the large quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56 and 3745-52-57? [3745-273-40(A)] Yes No N/A RMK#



- b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA "Acknowledgment of Consent" 3745-52-50 to -52-57? [3745-273-40(B)]
- c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)]

Yes ___ No N/A ___ RMK# ___

Yes ___ No N/A ___ RMK# ___

REMARKS



Spring 2008

LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] (possibly also cite 3745-52-11) If so: Yes No N/A ___ RMK# ___

a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)] Yes No N/A ___ RMK# ___

b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)] all slag & ash tested Yes No N/A ___ RMK# ___

2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] (possibly also cite 3745-52-11) Yes No N/A ___ RMK# ___

3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] scrubber acid - by analytical Yes No N/A ___ RMK# ___

4. Does the generator generate a characteristic hazardous waste? If so: Yes No ___ N/A ___ RMK# ___

a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] by analytical Yes No N/A ___ RMK# ___

NOTE: If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so: Yes No ___ N/A ___ RMK# ___ by analytical

a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes No N/A ___ RMK# ___

NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]



6. Has the generator **correctly** determined if restricted wastes meet or do not meet treatment standards? [3745-270-07(A)(1)] Yes No N/A RMK#

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

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

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

Note: In other words, is combustion a legitimate treatment method

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

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

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



11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] **If so:**

Yes ___ No ___ N/A RMK# ___

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

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? **If so:**

Yes ___ No ___ N/A RMK# ___

a. Has the facility complied with 3745-270-04?

Yes ___ No N/A RMK# ___

REMARKS



NOTIFICATION AND CERTIFICATION REQUIREMENTS

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

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

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

REMARKS



GENERATORS TREATING HAZARDOUS WASTE

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

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

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

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



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

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

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

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

REMARKS



HAZARDOUS DEBRIS

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

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

- 4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so: Yes__ No__ N/A RMK#__
 - a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)] Yes__ No N/A RMK#__
- 5. Is the waste a PCB waste under 40 CFR Part 761? If so: Yes__ No__ N/A RMK#__
 - a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)] Yes__ No N/A RMK#__
- 6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)] Yes No N/A__ RMK#__
- 7. Does the owner/operator of a treatment facility that claims the debris is excluded under 3745-51-03(F)(1) maintain the following information? Yes__ No__ N/A RMK#__
 - a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)] Yes__ No__ N/A RMK#__



b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)]

Yes ___ No N/A RMK# ___

c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)]

Yes ___ No N/A RMK# ___

8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F) have the following information? [3745-270-07(D)(3)]

Yes ___ No N/A RMK# ___

a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)]

Yes ___ No ___ N/A ___ RMK# ___

b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)]

Yes ___ No N/A ___ RMK# ___

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

Yes ___ No N/A RMK# ___

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

Yes ___ No N/A RMK# ___

REMARKS



TREATING FACILITIES

1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-13? [3745-270-07(B)] Yes No N/A RMK#

2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)] Yes No N/A RMK# *sent w/ every load*

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

3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07? [3745-270-07(B)(3)] Yes No N/A RMK#

4. Are wastes or treatment residues being sent to another TSD to be further managed? If so: Yes No N/A RMK#

a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)] Yes No N/A RMK#

5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? If so: Yes No N/A RMK#

a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)), excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)] Yes No N/A RMK#

b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4) [3745-270-07(B)(6)] Yes No N/A RMK#

c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)] Yes No N/A RMK#

6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)] Yes No N/A RMK#

7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have: Yes No N/A RMK#



a. Copies of all notices and certifications required in 3745-270?

Yes ___ No N/A RMK#___

b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49?

Yes ___ No N/A RMK#___

c. Followed the testing frequency specified in the facility's WAP?

Yes ___ No N/A RMK#___

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REMARKS



NW

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

Facility Name: _____
Facility Hazardous Waste ID#: _____ **Date of CEI:** _____

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

Safety Equipment Used: _____

GENERAL REQUIREMENTS

- 1 Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A
- 2 Are records of waste determinations 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
- 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
- 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) and 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
- 11 Does the generator export hazardous waste? If so:
 - 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 of the 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

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



- 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: [3745-65-16(D)]
- a. Job titles? [3745-65-16(D)(1)] Yes No N/A
Yes No N/A
- b. Job descriptions? [3745-65-16(D)(2)], Yes No N/A
- c. Type and amount of training given to each person? [3745-65-16(D)(3)], Yes No N/A
- d. Completed training or job experience required? [3745-65-16(D)(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

Job Performed

Name of Employee

Date Trained

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.

NOT INVOLVING WTI-GENERATED WASTE

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? [3745-65-32(D)] (per facility rep) 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 anyone time? [3745-52-34(C)(1)] Yes No N/A

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

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

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

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 and photograph the area.

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

a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A *7M*

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? Yes No N/A

[3745-52-34(A)(1)]

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

PRE-TRANSPORT REQUIREMENTS

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



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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:
 - 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 the SD 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

CONTINGENCY PLAN

21. 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

EMERGENCY PROCEDURES *SINCE LAST CBE NO INCIDENTS INVOLVING WTE - CERAMIC WASTES*

22. 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

PREPAREDNESS AND PREVENTION

23. 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

SATELLITE ACCUMULATION AREA REQUIREMENTS

24. 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
25. 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

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

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



27. Is the accumulation date on each container [3745-52-34(A)(2)] Yes No N/A
28. 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

29. Is the container accumulation areas(s) inspected daily in accordance with the permit? Yes No N/A
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes No N/A
30. 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
31. 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
32. 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
33. 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.

34. 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



Spring 2008

USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

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

PROHIBITIONS

- 1. Does the generator manage used oil in a surface impoundment or waste pile? If yes: Yes No N/A
 - a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] Yes No N/A
- 2. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes No N/A
- 3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? Yes No N/A

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

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

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

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

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

- 6. Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] Yes No N/A
- 7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] Yes No N/A
- 8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] Yes No N/A
- 9. Has the generator, upon detection of a release of used oil, done the



following: [3745-279-22(D)]

not released

- a. Stopped the release? Yes No N/A
- b. Contained the release? Yes No N/A
- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A

ON-SITE BURNING IN SPACE HEATER

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

GENERATOR TRANSPORTATION

- 11. If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24] Yes No N/A
- a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24] Yes No N/A
- b. Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24] Yes No N/A

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

COLLECTION CENTERS AND AGGREGATION POINTS

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

