



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

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

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

June 9, 2009

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

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

Dear Mr. Peterka:

On April 13 through April 22, 2009, 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. An additional interview was conducted on May 12, 2009 to further discuss concern #1. Inspectors with the Ohio EPA included Ms. Patricia Natali, Mr. Bill Lutz, Mr. Ron Shadrach, and me. WTI was represented by Ms. Carrie Beringer 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 included observation of operations during a walkthrough of the facility and a review of written documentation in the facility's operating record and other records.

Please respond to each of the violations and concerns listed below and send the requested information to me **within 30 days of the date of this letter**:

Violations:

1. Permit Condition B.3(b) General Waste Analysis Plan: The Permittee shall follow the procedures described in the approved waste analysis plan found in Section C of the approved Part B permit application and the terms and conditions of this permit.

During Ohio EPA review of the on-site laboratory, there were four issues that were found with regard to laboratory procedures. These issues were discussed with the Lab Manager, Mr. Don Venturini, and include:

- a. Flashpoint/Viscosity Logbook - page 81, line 28 - an entry was crossed out but not initialed and dated in accordance with the laboratory standard operating procedure (SOP).

- b. TCLP Refrigerator Logbook Number 594 - page 8, line 6 - the line is blank. Laboratory SOPs require temperature readings be taken and recorded on a daily basis. It appears that the temperature on November 6, 2008 was not recorded.
- c. Standards Expiration Dates - Three bottles of infrequently used standards were on the shelves, with expiration dates indicating they were expired. Two of the bottles had never been opened. These standards were ICSB 421-65-19 with an expiration date of 1/30/09, Titanium Lot #7E136 with an expiration date of 12/15/08, and Titanium Lot #06J119 with an expiration date of 8/19/08.
- d. Lab Standards - two standards for Mercury analysis on the lab shelves were beyond their expiration dates. These standards were Mercury 10% HNO₃, Lot #14-11HG IVC with expiration date of 1/30/09 and Mercury 5% for curve, HNO₃, Lot #14-02HG with expiration date of 1/30/09. There were two working standards which had been made from these expired standards. During the CEI, it was found that those working standards were actively being used in the laboratory despite the fact that the original "parent" standards were beyond their expiration dates.

Further investigation into the fourth issue described above as (d) revealed WTI Laboratory Procedure LABOP-156 has a provision that allows for expired standards to be used if the accuracy is verified with an unexpired standard. However, WTI laboratory personnel did not follow standard laboratory procedures prior to expiration of the standard. WTI also indicated that their laboratory practice was to label the working standards with the date of their preparation and not the expiration date of the "parent" standard.

In addition, Ohio EPA requested that WTI review their records to determine the number of samples analyzed utilizing these expired standards. WTI indicated that approximately 1,500 samples (including blanks, QA/QC samples, etc) were possibly affected. In order to evaluate the impact of the lab error, WTI personnel acquired additional standards to perform a verification check in accordance with the procedure. The results indicated the expired standards were still accurate, despite being beyond the expiration date. Ohio EPA reviewed this information with WTI laboratory personnel. Because the expired standards were proven to be accurate, Ohio EPA determined there was no impact to human health and the environment.

Ohio EPA has requested that WTI include the expiration date of the original standard as the expiration date on all working standards. WTI has also added a notation on the laboratory form to verify the expiration date on a weekly basis, prior to conducting analyses. Expired standards must be disposed of or their accuracy must be verified in accordance with Laboratory Procedure LABOP-156 prior to use. In addition, WTI may chose to purchase infrequently used standards in smaller volumes.

Please provide a response explaining the actions WTI will take or has taken regarding each of these issues. In regards to issue (b), please explain the ramifications for not taking and recording the temperature, and explain why the SOP requires the temperature be monitored and recorded daily. In regards to issue (c), describe any additional actions to be taken to ensure laboratory standards and working standards are not utilized beyond the expiration date of the original standard. Provide Ohio EPA with a revised LABOP-156 that includes the changes mentioned.

2. Permit Condition C.5 Management of Containers: All container storage shall be conducted within the container storage units as described in Condition C.1. of the permit and Section D of the approved Part B permit application.

During the walkthrough, a bucket hoist box (box #9) was observed in Brass Alley with two small bottles of hazardous waste remaining in the box. Brass Alley is an area not permitted for hazardous waste management or storage. WTI personnel removed the bottles shortly after discovery, thus abating the violation immediately.

Please revise the standard operating procedure (SOP) for utilizing the Bucket Hoist. Language should be included regarding boxes being completely empty (all waste removed), and cleaned or rinsed if necessary, prior to placement in any A areas (not in containment). Please provide a copy of the revised SOP to Ohio EPA on-site inspectors during the next monthly meeting.

General Concerns:

3. Fiber Drum and Black Pail - During the walkthrough, a black 5-gallon plastic pail was observed inside a fiber drum, directly outside and north of Bay 1 (E Bay) of the Tanker Unloading Building. The black pail contained approximately 3 inches of what appeared to be a clear, thin oil. The pail was not labeled with a description of the contents, and there was no lid. There was also no way to visually determine whether the contents were hazardous waste. After investigation by WTI personnel, it was determined that the oil was not hazardous waste nor was it used oil. WTI personnel stated that the oil was utilized to fill equipment during processing activities. The WTI personnel responsible for the processing activities had neglected to return the oil to the original container upon completion of their activities. During the investigation it was determined the drum and pail had been there for three days prior to Ohio EPA's observation during the CEI.

Please describe the actions to be taken by WTI in order to ensure containers, products, and materials utilized during projects are removed upon project completion. Please add a section to the BOP Daily/Weekly Inspection Form, (L) Bulk Liquid Unloading Building and East Bay, to include an inspection of the area directly outside of the bays.

4. Container in Warehouse without a WTI label - During the walkthrough, a drum without a WTI label was observed on the top rack of a bin in the container storage warehouse. The situation was investigated and it was determined that the container had been received, weighed, and labeled correctly upon arrival. This information was accessed via the original generator's label, the pallet number, and subsequent WTI computer records. It appears that the label may not have adhered properly to the container. The container was re-labeled and returned to storage.

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/oeel/>.

The Division of Hazardous Waste Management has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link:
http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage.

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

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

OHIO PART B PERMITTED FACILITY
RCRA INSPECTION CHECKLIST

Letter
6-9-2009

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: 4/13-1, 2009 Time: _____ a.m. / p.m.

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>

Inspectors: Bill Lutz Ron Shadrock - NEDO

Facility Reps: Carrie Beringer, Vince Waggle, Jeff Hall
Scott Strobel, Jim Davis, Kevin Lloyd

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: 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 Included In TSD Checklist Yes No

AUTHORIZED ACTIVITIES

STORAGE		TREATMENT		DISPOSAL	
X	Containers	X	Containers	----	Injection Well
X	Tanks	X	Tanks	----	Surface Impoundment
----	Waste Pile	X	Miscellaneous Units	----	Landfill
----	Surface Impoundment	X	Incinerator	----	Land Application
			Thermal Treatment		

Post-Closure Care Corrective Action
 WTI is a Clean-Close Facility

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.

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

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

**MAY 2008
Revision 1**

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] March 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, ORC Chapter 3734. or the rules adopted thereunder which may endanger human health or the environment? If so, Yes No N/A ___ RMK#

REMARKS

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

DE

PN
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#

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#

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,

a. Has the Permittee promptly submitted such facts or corrected information to the appropriate entity? [Condition A.24.]

Yes No N/A RMK₃

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 RMK₃

8. Is the Permittee retaining a complete copy of the approved application on-site? [Condition A.14.(c)]

Yes No N/A RMK₃

9. Is the Permittee planning any physical alterations or additions to the permitted facility?

Yes No N/A RMK₃

a. If so, has the Permittee given notice to the director of such alternations/additions? [Condition A.15.]

Yes No N/A RMK₃¹

b. Have such changes been made in accordance with OAC rule 3745-50-51? [Condition A.15.]

Yes No N/A RMK₃

REMARKS

#1 CI will be submitted w/in 7 days for replacement of stack + kiln

DFE

BL

[Handwritten mark]

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 ORC Chapter 3734. and the rules adopted thereunder? Yes No N/A RMK#

REMARKS

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.] *- ECIS - WPS - Shrouds*
- 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? *in WPS*
- Yes No N/A RMK#

- g. Documents required to be maintained by land disposal restriction requirements of Chapter 3745-270?
- 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#

- 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#

CB

h.

- 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,
- 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#

no post closure plan, will clean to

Weekly
Alarm
WFCO -testing

4/09

CB
PN

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)]

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

Bl

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

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 Waste Characteristics and Waste Analysis Plan (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#

BL

WASTE MINIMIZATION REQUIREMENTS

11. Did the Permittee submit a Waste Minimization Report, to Ohio EPA, NEDO, 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#

next due on 9/19/09

12. Following the first submittal as identified above in Question #11, 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

Generator

3745-52-20
52-23

- 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)? *Generator completed 1-20*
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? *generator, each transporter, must 2/0 of designated facility*
Yes No N/A ___ RMK#

 - c. The Permittee has designated at least one permitted disposal facility and has/will ^{may} 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? *sign say 'by hand'*
hand signed'
Yes No N/A ___ RMK#

The one-time documentation is in the

MANIFEST REQUIREMENTS (continued)

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)]

TSD
3745-54-71

a. Noted the discrepancy on ^{each copy of the} 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?

Yes No N/A RMK#
no instances within last year

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.]

Yes No N/A RMK#

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

Jim Davis may have sent a letter, C.B. will check

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):

Yes No N/A RMK#

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#

- 3745-54-12 TSD receiving waste from offsite shall inform the generator in writing that he has the appropriate permits for & will accept the waste the generator is shipping - O/O shall keep a copy of this written notice as part of its record.

w/ @ WPS

Mangus

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

DE

Don ✓ 1BL

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?
Yes No N/A ___ RMK#

2. Does the Permittee repeat the analyses required in OAC Rule 3745-54-13 and the Waste Characteristic and Waste Analysis Plan (WAP).

a. When the generator of the waste notifies the Permittee the process generating the waste has changed?
approved Yes No N/A ___ RMK#

b. Annually?
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?

customer service 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?
Yes No N/A ___ RMK#

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

Yes No N/A ___ RMK#

Don ✓ 1BL

6. Does the Permittee treat any restricted wastes, e.g., F032, for which a specified technology (or technologies) has/have been established as the LDR treatment standard? *approvals*

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, waste profile surveys (WPS) prior to scheduling and receipt at the facility?

Yes No N/A RMK#

PN
MT

a.

a. In the case of conditional approvals, has the Permittee abided by all conditions? *approvals*

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 (WAP), e.g., copy over procedures, sampling, analyses, and revisions?

Yes No N/A RMK#

REMARKS

Don V / PL

add with CEM

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 values into the DCS to ensure feed rates are not exceeded?

Yes No N/A RMK#

13. Does the Permittee conduct adequate sampling and analytical for PCBs? Provide the SOP.

Yes No N/A RMK#

a. Has the lab procedure for the sampling methodology changed since the last inspection?

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 waste analysis according to the quality assurance section of the WAP?

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#

Don V / BL

17. Does the Permittee use only the analytical test methods as specified in the approved facility's WAP? Yes No N/A ___ RMK#

18. Does the Permittee obtain samples of waste for analysis using the methods and equipment specified in the approved facility's WAP? Yes No N/A ___ RMK#

19. Does the Permittee manage and treat lab pack waste in accordance with the approved facility's WAP? Yes ___ No N/A RMK#

20. Does the Permittee manage and treat restricted waste in accordance with the approved facility's WAP? 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#

*fixed margins
4/13/09*

MIXED INFECTIOUS AND HAZARDOUS WASTE

TRACKING

- 1. Has the Permittee notified the Ohio EPA in accordance to the permit and the SOPs when mixed infectious and hazardous waste (MIHW) has been **scheduled** to arrive at the facility?
Yes No N/A RMK#
- 2. Has the Permittee notified the Ohio EPA in accordance to the permit and the SOPs when mixed infectious and hazardous waste (MIHW) has **arrived** at the facility?
Yes No N/A RMK#
- 3. Has the Permittee notified the Ohio EPA in accordance to the permit and the SOPs when mixed infectious and hazardous waste (MIHW) has been **thermally treated/disposed** of at the facility?
Yes No N/A RMK#
- 4. Has the Permittee received non-conforming MIHW ~~characterized as major~~? If so:
 - a. Did the Permittee notify (verbally) Ohio EPA of the non-conformance?
Yes No N/A RMK#
 - b. Did the Permittee contact the generator/customer responsible for the non-conforming waste?
Yes No N/A RMK#
 - c. Did the Permittee document the information required in the permit, i.e., container receipt date, container id number, description of the non-conformance, date the non-conformance was discovered, date of resolution, description of the resolution
Yes No N/A RMK#

REMARKS

DE

MIXED INFECTIOUS AND HAZARDOUS WASTE

MANAGEMENT OF MIHW

5. Has MIHW been managed only in areas designated by the permit and the permit application? Yes No N/A ___ RMK#

6. Has MIHW been managed in accordance with the permit and the SOPs, i.e., with spill kits easily accessible, sumps set to manual setting during the processing, by personnel trained to handle MIHW? Yes No N/A ___ RMK#

7. Have any shipments of MIHW remained on-site beyond 24 hours, 48 hours? Yes No N/A ___ RMK#

a. What steps were taken?

8. Has the Permittee inspected the treatment residual when MIHW is incinerated in accordance with the permit and the SOPs to ensure the waste is completely combusted and is no longer recognizable? Yes No N/A ___ RMK#

a. Has the Permittee recorded the hourly inspection of the treatment residual? Yes No N/A ___ RMK#

9. Has the Permittee recorded any instances when the MIHW was still recognizable after the combustion process? Yes ___ No N/A RMK#

a. What steps were taken as a result of the incomplete combustion?

DE

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
 - Yes No N/A ___ RMK#
 - b. An artificial barrier such as a fence (in good repair) which completely surrounds the active portion of the facility? Or
 - Yes No N/A RMK# /
 - c. A means to control entry, at all times, through gates or other entrances, to the active portion of the facility?
 - Yes No N/A ___ RMK#

- 2. 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?
 - Yes No N/A RMK# #1
 - b. Does the Permittee repair the damage to the fence as soon as possible *& dependent upon scale of damage*?
 - Yes No N/A RMK# #1

- 3. Are all entry gates and other locations posted with signs prohibiting unauthorized entry?
 - Yes No N/A ___ RMK#

- 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.]
 - Yes No N/A ___ RMK#

REMARKS

#1 In March 2009, fence repaired (all the problems) all ~~dis~~ disrepairs, such as bottom rail, top rail

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 Facility Installation and Operation Permit and the approved Part B permit application (hereafter known as permit)? 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 approved permit? 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? *not fully operational at this time* 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

R. Stovall
4/12/09
w/ Vince Wagle
& Training Plan
Rev. 19 10/1/2008

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#
Vince does not have training mod per se how mod online & treat taken for personnel

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 current employees 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#

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#

REMARKS

Reviewed: A. Colet, S. Koller, D. Sege, L. Zambini & R. Stovall - see Attached
Contingency Plan Training:
- ER SOP 001 & 002 - cover portions of contingency plan
- plant wide emergency training.

PERSONNEL TRAINING

RS

3. 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#

4. Does the Permittee modify Section H, Training Plan, in the event of 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#

Per Jeff Hall

5. Does the Permittee provide training to contractors on potential hazards they may encounter while working on-site? Yes No N/A ___ RMK#

a. Are contractors instructed on site-specific safety requirements and procedures? Yes No N/A ___ RMK#

b. Is the training for contractors recorded and maintained at the facility as part of the operating record? Yes No N/A ___ RMK# ?
maintained on paper - example provided

6. 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# ?

7. 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#

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 procedures including, but not limited to, notifications, personal safety controls, emergency shut-down procedures, emergency alarms, basic and advanced structural fire fighting techniques, Hazwopper refresher, and evacuation routes. Yes No N/A ___ RMK#

e. Spill containment and control procedures including equipment location and use and decontamination procedures Yes No N/A ___ RMK# ?

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#
OK, per selected review

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#

*J-46
Hall*

10. Is the Training Director or their designee 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# ?

11. Are all employees categorized as hazardous waste responders receiving Hazardous Waste Management Introductory Training?

Yes No N/A RMK#

REMARKS

onsite trainers of Program - 12 trainers get outside on training.

PERSONNEL TRAINING

12. At a minimum are employees being trained initially and on an annual basis for the following?

a. Overview of facility and operations - site security; waste profile system, processing and handling of waste; sampling, laboratory activities; prohibited/restricted waste; waste arrival and waste unloading; description of waste and hazardous waste materials being managed; container, bulk waste, tank storage areas; 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; and processing/ incineration

Yes No N/A ___ RMK#

d. Emergency Response Training - first aid and CPR; structural fire fighting; general contingency plan review; 40 hour Hazwoper; PPE, fire suppression methods; containment of fire suppression run off; emergency and monitoring equipment; communications and alarms, response to spills and releases; and air monitoring.

Yes No N/A ___ RMK#

*Contractors - Green + Red badges (restricted)
24 Hr HW train vs. low impact training*

BL

B.L.

Jeff Hall

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#

REMARKS

M

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 1/2) feet between each ^{double-wide} row of pallets on the floor in Container Holding Building (Slag Canopy);

Yes No N/A RMK#

REMARKS

D

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))?

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

Yes No N/A ___ RMK#

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

Yes No N/A ___ RMK#

STAGING REQUIREMENTS (continued)

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#

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 upon receipt at the facility?

Yes No N/A ___ RMK#

d. Does the Permittee ensure 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

R. Shadrach
7/13/09

w/ Jeff Hall

& Cont. Plan

Rev. 26 - 9/18/2008

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#
No reported revisions in last 6 mos.

5. Has the Permittee submitted a copy of the approved contingency plan and all revisions, amendments and modifications to Ohio EPA in accordance with OAC rule 3745-54-53? [Condition B.18.(c)] Yes No N/A ___ RMK#

live documents updates July, Jan. 2008

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#

order as listed on Table 6.1

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 on-site? Yes No N/A ___ RMK#

Does the plan contain the following elements as required by Condition B.15., OAC rule 3745-54-52, and Section G:

a. 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. 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. 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. 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#
No. in regards to activity cont. plan
- 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? Yes ___ No N/A RMK#
- i. Did the Permittee manage the material as hazardous waste until such time as the Permittee demonstrated the waste was 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, 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)] 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#

Carroll / BL

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

came
CLOSURE PROCEDURES / *BL*

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, Section I? [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#

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.

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 WT1, in order to minimize the risk of transportation related incidents? [Condition B.41.(b)]

Yes No N/A RMK#

check/box should be around 'x'

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)? *license thru Heritage*
- 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 Permittee 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 Permittee return a signed copy of the manifest to the generator before leaving the generator's property?
 - c. Does the Permittee ensure the manifest accompanies the hazardous waste?

Yes No N/A RMK#

Carroll 1B

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)? Yes No N/A RMK#

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. 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#

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#

REMARKS

Comed / BCL

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)]
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?
Yes No N/A ___ RMK#
 - 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#
- 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.

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

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?

Yes No N/A ___ RMK#

a. If the Permittee observes waste in a container with questionable integrity, do they transfer the hazardous waste to a container 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).

W

CONTAINER MANAGEMENT AND STORAGE (cont.)

- 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. Does the Permittee store hazardous waste in containers that are compatible with the hazardous waste? Condition C.4
add space → 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]
add space → 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)]
 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#

DE

12 foot

margin

M

CONTAINER MANAGEMENT AND STORAGE (continued)

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#

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 ensure that 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)
Yes No N/A ___ RMK

15. 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
hasn't happened, yes if applicable

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

REMARKS *they would, in the event it happened*

DE

M

CONTAINER MANAGEMENT AND STORAGE (cont)

Does the Permittee maintain the containment system as follows: [Condition C.6.(b)]

Yes ___ No N/A ___ RMK#

DE

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#

DF

Container Management & Storage (cont)

W

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

DE

TANK STORAGE, TREATMENT, AND MANAGEMENT

R. Sheehan
4/13/09
w/ Kevin Lloyd

Does the Permittee limit the storage of hazardous waste in tanks to the following, as required by Permit Condition D of the VRA permit:

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# - *work order generated each year - inspected internally - on computer?*
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#

REMARKS

35-90' x 20' W x 12-15' D
 Repair base added concrete + rebar ~ 3 years ago
 Reviewed Heritage-WTI 2002 Tank Thickness Survey by Team Industrial Services.

TANK STORAGE, TREATMENT, AND MANAGEMENT (cont.)

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

RS

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?
blending according WAP.

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#

*See BOP
Mike
Nichols
for July 2*

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#

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?
Annually

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?
PT 3 replaced in 2001. Formerly held acids.

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?
Inspect monthly by maintenance dept.

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#

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#
Lab compatibility tests of tank + load - Lab should have this documentation.

9. 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#

TANK STORAGE, TREATMENT, AND MANAGEMENT

*Duplicate?
of page 47?*

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

CB
PT

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#

- 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#

- 4. Has the Permittee changed the land use of the COFRA undergoing corrective action? Yes ___ No N/A ___ RMK#

REMARKS

revise

CB
PT

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?

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 OAG Rules ~~3745-54-90~~ through 3745-54-101? *permit*

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

revise

Missing pg 52

DE

BL

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 months? 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.

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#

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

INCINERATION

2003 2010 KL PN

- 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. *427°F* 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. *C.B.* 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? Yes No N/A ___ RMK#

The following waste streams being restricted from incineration.

- 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 or, waste that is, or was at one time, regulated by TSCA, 40 CFR 761? Yes ___ No N/A RMK#
- c. Dioxin bearing waste requiring treatment technology achieving 99.9999% DRE and/or assigned hazardous waste codes F020 through F023, F026, and F027. Yes ___ No N/A RMK#
- d. Infectious wastes 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. Yes ___ No N/A RMK#
- f. Radioactive wastes Yes ___ No N/A RMK#
- g. Other prohibited wastes as described in Section C. Yes ___ No N/A RMK#

WTI has not received any of these types of waste

CB
P-codes
F-codes
U-codes

DF

KL
PN

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#

MT → 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]
CB
WTI requires certification from generator

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.

- coal spray
- waste oil

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?
Feedback w/ #5 pg 55
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

DE

INCINERATION - TESTING

last test 2006 for dioxin/furan K4 PN

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#

14. Does the Permittee test the incineration system as directed by the Ohio EPA 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?

Yes No ___ N/A ___ RMK#

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

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

DE

KY
PN

INCINERATION – ECIS, PLUME 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. operating at all time waste is in the incineration system. Yes No N/A ___ RMK#
- b. monitored, recorded, and tested in accordance with Attachments 1 and 3 to the RCRA Permit. Yes No N/A ___ RMK#
- c. The activated carbon feed system for the ECIS calibrated monthly. *Don Segra* Yes No N/A ___ RMK#
- d. The result of the calibration taken each week is 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 No N/A ___ RMK#
- a. 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? 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? 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)? *can not feed waste H.W. until OPLs are met*
- a. Is the incinerator system inspected thoroughly prior to each start-up? *dependent upon length of outage* 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

IKY
PN

21. Has the Permittee submitted a 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#
not within last 6 months

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]

Yes No N/A ___ RMK#

a. Does the Permittee record all inspection data and incorporate within the operating record?

ROP & incineration

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?

*CB
EHS*

security

Yes No N/A ___ RMK#

c. 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#

d. 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#

e. Does the Permittee maintain all inspection records in the operating log in accordance with OAC Rule 3745-54-73?

Yes No ___ N/A ___ RMK#

CM/DCS coordinator Rich Phillips

KL
PN

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 % 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.]
Yes No N/A RMK#

a. Does the Permittee replace the carbon boxes in accordance with Section D? (constant degree)
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#

END OF INCINERATION SECTION

REMARKS

check the fed permit w/ RCRA state permit

ask C.B. to see the record

check permit language

DE

K.L.
PN

TREATMENT IN MISCELLANEOUS UNITS

Currently, the Extruder is the only miscellaneous unit operating.

1. C.B.

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#

do not
revise

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 or restricted?
Yes No N/A RMK#

3. revise

Does the Permittee inspect the miscellaneous units ~~in~~ in accordance with Section F of the approved Part B permit application? [Condition F.7.] *see how often it is used*
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:
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#

Extruder - no aerosols

REMARKS

fuels blending

P.T. to Tank Farm (any tank)

T 8 + T 9 to Lumber (in house 3)

DE

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#

CB
-PN

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,
 - 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)]
Yes No N/A ___ RMK#
If so, does the notification include the following:
 - a. EPA hazardous waste number(s) [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#

CB
PN

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#

268-40
268-48
UHC

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#
WT sends notice w/ each shipment

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

a. EPA hazardous waste number(s) [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#

CB
PN

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

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
----	--	------------

PROHIBITIONS

2.	Did the LQUWH dispose of universal waste? [3745-273-31(A)]	Yes <input checked="" type="radio"/> No N/A
----	--	---

3.	Did the LQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-37 or managing specific wastes as provided in OAC rule 3745-273-33? [3745-273-31(B)] (this change makes it like the SQUWH checklist)	Yes <input checked="" type="radio"/> No N/A
----	---	---

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES

4.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)]	Yes No N/A
----	---	------------

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? [3745-273-33(A)(1)]	Yes No N/A
----	---	------------

6.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-33(A)]	Yes No N/A
----	---	------------

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
----	--	------------

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
----	---	------------

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
----	---	------------

8.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-34(A)]	Yes <input checked="" type="radio"/> No N/A
----	--	---

UNIVERSAL WASTE PESTICIDES

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 <input checked="" type="radio"/> N/A
----	---	---

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 <input checked="" type="radio"/> N/A
-----	--	---

11.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97; 3745-66-100 and 3745-66-101 of the OAC met? [3745-273-33(B)(3)]	Yes No <input checked="" type="radio"/> N/A
-----	---	---

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 <input checked="" type="radio"/> N/A
-----	--	---

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 <input checked="" type="radio"/> N/A
-----	--	---

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?"	Yes No <input checked="" type="radio"/> N/A
-----	--	---

	[3745-273-34(C)(1)&(2)]	
UNIVERSAL WASTE THERMOSTATS		
15.	Have thermostats that show evidence of leakage, spillage or damage that could cause leaks been contained in a container that is closed, structurally sound, compatible with contents of the thermostats and lacks evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(C)(1)]	Yes No <u>N/A</u>
16.	If the mercury-containing ampules are removed, does the LQUWH: [3745-273-33(C)(2)]	<u>N/A</u>
a.	Remove the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-33(C)(2)(a)&(b)]	Yes No <u>N/A</u>
b.	Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-33(C)(2)(c)&(d)]	Yes No N/A
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
d.	Ensure that employees are thoroughly familiar with proper waste handling and emergency procedures? [3745-273-33(C)(2)(f)]	Yes No N/A
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
f.	Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-33(C)(2)(h)]	Yes No N/A
17.	When removing mercury containing ampules from thermostats if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining thermostat units), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-33(C)(3)(a)]	Yes No <u>N/A</u>
a.	If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-33(C)(3)(b)]	Yes No N/A
18.	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 <u>N/A</u>
UNIVERSAL WASTE LAMPS		
19.	Does the LQUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and 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)]	<u>Yes</u> No N/A
20.	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)]	<u>Yes</u> No N/A
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 rule 3745-52-34).		

Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.		
21.	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
ACCUMULATION TIME		
22.	Is the waste accumulated for less than one year? [3745-273-35(A)]	Yes No N/A
a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate.) [3745-273-35(B)]	Yes No N/A
NOTE: Accumulation is defined as date generated or date received from another handler.		
23.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-35(C)] If yes, describe below:	Yes No N/A
EMPLOYEE TRAINING		
24.	Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36]	Yes No N/A
RESPONSE TO RELEASES		
25.	Are releases of universal waste and other residues immediately contained? [3745-273-37(A)]	Yes No N/A
26.	Is the material released characterized? [3745-273-37(B)]	Yes No N/A
27.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-37(C)]	Yes No N/A
OFF-SITE SHIPMENTS		
NOTE: If a LQUWH self-transportes wastes, then the handler must comply with the Universal Waste transporter requirements.		
28.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)]	Yes No N/A
29.	Is the handler aware of DOT requirements for packaging and shipping? If not, make aware of 40 CFR 171-180.	Yes No N/A
30.	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
31.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes No N/A
a.	If yes, did the originating handler receive the waste back or agree to where shipment was sent? [3745-273-38(E)(2)]	Yes No N/A
32.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler to discuss and do one of the following:	Yes No N/A
a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-38(F)(2)]	Yes No N/A
33.	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
TRACKING UNIVERSAL WASTE SHIPMENTS		
34.	Are universal wastes received from another handler? If so:	Yes No N/A
a.	Is a record (log, invoice, manifest, bill of lading, or other shipping document) of each shipment kept? [3745-273-39(A)]	Yes No N/A
35.	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

SW

	b.	Quantity of each type of universal waste? [3745-273-39(A)(2)]	Yes No N/A
	c.	Date received? [3745-273-39(A)(3)]	Yes No N/A
36.		Is universal waste shipped to another handler? If so:	Yes No N/A
	a.	Is a record of each shipment kept? [3745-273-39(B)]	Yes No N/A
37.		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
	b.	Quantity of each type of universal waste? [3745-273-39(B)(2)]	Yes No N/A
	c.	Date shipped? [3745-273-39(B)(3)]	Yes No N/A
38.		Are records kept for three years? [3745-273-39(C)(1)&(2)]	Yes No N/A

EXPORTS

39.		Is waste being sent to a foreign destination? If so:	Yes <u>No</u> N/A
	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
	b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-40(B)]	Yes No N/A
	c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)]	Yes No N/A

Generator LDR Inspection

Does not apply to CESQGs

Pre-Inspection: Prior to a generator inspection, you can review the types of hazardous waste a generator produces by using to DRUMS. The information entered into DRUMS tells you the form of the HW, (i.e., debris, air pollution control sludge, spent solvent, etc.); where it was sent and how the HW was treated. This information is especially useful in finding HW that are being improperly treated such as certain metal-bearing wastes that are improperly treated by burning. Armed with this information, you are better prepared to ask specific questions during the inspection to determine if the HW is being properly treated.

GENERAL REQUIREMENTS

1. Generator's Name:

Waste code(s):

Description of waste:

2. Was the HW...

- N Deep well injected at a permitted facility,
N Exempted per 51-04, 51-05 or 51-06 from being a HW/waste,
N Recycled by use/reuse 51-02 (E), or
N A characteristic sludge/byproduct that was reclaimed, 51-02?

If yes, LDR treatment standards do not apply to the HW. But, generator is required to have a notification statement in its file explaining why the LDR treatment standards do not apply.

Does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [270-07 (A)(7)]

Yes ___ No N/A RMK# ___

3. Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used [270-07(A)(1)]

Yes ___ No N/A RMK# ___

Note: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 270-40. However, if a specific treatment method is given in 270-40 for the HW, no determination is required [270-07 (A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 270-49 (alternative treatment levels for soils).

4. Does the generator have documentation of how he determined whether the HW/soil meets the LDR treatment standard in #3, above? [270-07(A)(6)(a) or 270-07(A)(6)(b)] Yes ___ No N/A RMK# ___

5. Has the documentation required in #3, above, been kept for three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [270-07(A)(8)] Yes ___ No N/A RMK# ___

6. Did the generator determine if its listed HW exhibits a characteristic that is not required to be treated for under the LDR treatment standard for the listed HW? [270-09(A)] Yes ___ No N/A RMK# ___

For example: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 270-40 to determine what constituents the listed HW is treated for.

7. Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [270-09(A)] Yes No N/A ___ RMK# ___

Note: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.

Note: Documentation of this determination is not required however, the generator needs to demonstrate that he made a good-faith effort to evaluate the waste for UHCs.

8. Did the generator treat his HW /soil on-site to meet the LDR treatment standard? Yes ___ No N/A

Note: If "Yes" skip to # 16

9. Did the generator send a one-time LDR notification form to the TSD with the first shipment of HW to that facility? [270-07(A)(2)] Yes No N/A ___ RMK# #1

10. Does the generator have a copy of the LDR notification form on file on-site for three years after last HW was shipped? [270-07(A)(2)] Yes No N/A ___ RMK# ___

11. Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [270-07(A)(2)] Yes ___ No N/A ___ RMK# #1

12. **Notification Form:** Does the LDR Notification form contain the following information: Yes No N/A ___ RMK# #1

A. Manifest number of the first waste shipment to the TSD [270-07(A)(2)]

#1 Permittee sends LDR notifications w/ each H.W. shipment

B. Applicable waste codes (includes characteristic codes for a listed HW if applicable) [270-07(A)(2)]

Yes No N/A RMK#

C. A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements. [270-07(A)(2)]

Yes No N/A RMK#

D. A designation whether the HW is a wastewater or nonwastewater. [270-07(A)(2)]

Yes No N/A RMK#

Note: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or nonwastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.

E. Designation of the waste subcategory when applicable. [270-07(A)(2)]

Yes No N/A RMK#

Note: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories.

F. A listing of the underlying hazardous constituents for which a characteristic waste must be treated. [270-07(A)(2)]

Yes No N/A RMK#

Note: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.

G. If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for?[270-07(A)(2)]

Yes No N/A RMK#

Note: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.

13. Is the HW treated by burning?

Yes No

If "No," go to #16.

14. Is the HW a metal-bearing HW?

Yes ___ No ___

Note: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 270-03

15. Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless one of the following conditions apply. [270-03(c)]

A. Contains > 1% TOC?

Yes ___ No N/A ___ RMK# ___

B. Contains organic constituents or cyanide at levels greater than the UST levels?

Yes ___ No N/A ___ RMK# ___

C. Is made up of combustible material e.g., paper, wood, plastic?

Yes ___ No N/A ___ RMK# ___

D. Has a reasonable heating value (e.g., > 5000 Btu)?

Yes ___ No N/A ___ RMK# ___

E. Co-generated with a HW that must be combusted?

Yes ___ No N/A ___ RMK# ___

If all responses to A through E are "No", HW is being improperly treated by dilution, violation of 270-03(C) Is HW being treated by dilution?

Yes ___ No ___

16. Was the HW treated by wastewater treatment?

Yes ___ No

→ A. Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [270-03(B) and 270-40(A)(3)]

Yes No ___ N/A RMK# ___

Note: If Yes, HW is improperly being treated by dilution.

B. Does the waste carry the D001 code and contain $\geq 10\%$ TOC?

Yes ___ No ___

C. Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?

Yes ___ No ___

Note: If the answers to B & C are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [270-03(B) and 270-40(A)(3)]

Note: A list of separation/recovery processes are given in 270-42 under RORG.

17. Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard? Yes ___ No

If "Yes"...complete the rest of the checklist. If "No"...stop...you are done.

- A. Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? 270-07(A)(5) Yes ___ No N/A ___ RMK# ___

- B. Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? 270-07(A)(5)(a) Yes ___ No N/A ___ RMK# ___

Note: This is a laboratory analysis but it does not have to be kept by the generator.

- C. Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? 270-07(A)(5)(a) Yes ___ No N/A ___ RMK# ___

- D. Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? 270-07(A)(5)(a) Yes ___ No N/A ___ RMK# ___

- E. Does the generator keep the WAP on-site? 270-07(A)(5)(b) Yes ___ No N/A ___ RMK# ___

- F. Is the WAP available for the inspector's review during the inspection? 270-07(A)(5)(b) Yes ___ No N/A ___ RMK# ___

18. **Notification Form:**

- A. Contains all information in #12 A-G above and Yes ___ No N/A ___ RMK# ___

- B. If the treated HW/soil is listed.....notification contains the following certification statement: Yes ___ No N/A ___ RMK# ___

" I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

- C. If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator :

1. Send a one-time notification to the director?[270-09 (D)] Yes ___ No N/A ___ RMK# ___

2. Maintain a copy of the notice onsite?[270-09(D)] Yes ___ No N/A ___ RMK# ___

3. Include in the notification: 270-09(D)(1)(a)

- a. Name & address of receiving landfill
 - b. Description of HW when generated
 - c. HW code when generated
 - d. Treatability group when generated
 - e. Underlying hazardous constituents present when generated
4. Contain the right certification statement as required by [270-07(b)(4)]?

Yes ___ No N/A ___ RMK# ___

NOTIFICATION AND CERTIFICATION REQUIREMENTS

- 13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)] Yes ___ No N/A ___ RMK# ___
- 14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)] Yes ___ No N/A ___ RMK# ___
- 15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)] Yes ___ No N/A ___ RMK# ___
- 16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)] 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:
 - 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)] Yes ___ No N/A ___ RMK# ___
- a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)] Yes ___ No N/A ___ RMK# ___
- b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] Yes ___ No N/A ___ RMK# ___
3. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] Yes ___ No N/A ___ RMK# ___
4. Has the generator followed their WAP [3745-270-07(A)(5)]? Yes ___ No N/A ___ RMK# ___
5. Have the treated wastes met the applicable treatment standards in 3745-270-40? Yes ___ No N/A ___ RMK# ___

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

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

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

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

10. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so:

Yes ___ No ___ N/A ___ RMK# ___

a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49 (C)]

Yes ___ No N/A ___ RMK# ___

11. Does each notification/certification form completed, contain the information found in 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 from regulation as a hazardous waste under 3745-51-03(F)(1) maintain the following information?

Yes ___ No ___ N/A ___ RMK# ___

- a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)]

Yes ___ No N/A ___ RMK# ___

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

Yes ___ No N/A ___ RMK# ___

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

Yes ___ No N/A ___ RMK# ___

- 8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F)(1) have the following information? [3745-270-07(D)(3)]

Yes ___ No ___ N/A ___ RMK# ___

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

Yes ___ No N/A ___ RMK# ___

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

Yes ___ No N/A ___ RMK# ___

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

Yes ___ No N/A ___ RMK# ___

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

Yes ___ No ___ N/A ___ RMK# ___

REMARKS

TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS

1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-13?[3745-270-07(B)] Yes ___ No N/A ___ RMK# ___
2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)] Yes ___ No N/A ___ RMK# ___

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

3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07?[3745-270-07(B)(3)] Yes ___ No N/A ___ RMK# ___
4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so:**
- a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)]
5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? **If so:**
- a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)), excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)] Yes ___ No N/A ___ RMK# ___
- b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4)[3745-270-07(B)(6)] Yes ___ No N/A ___ RMK# ___
- c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)] Yes ___ No N/A ___ RMK# ___
6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)] Yes ___ No N/A ___ RMK# ___
7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have:
- a. Copies of all notices and certifications required in 3745-270? Yes ___ No N/A ___ RMK# ___
- b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49? Yes ___ No N/A ___ RMK# ___
- c. The testing frequency specified in the facility's WAP and have they followed the protocol? Yes ___ No N/A ___ RMK# ___

REMARKS



Don V | BL

WAP Questions for VRA CEI

1. Review documentation verifying compliance with requirement for an annual analysis of each waste stream (Permit condition B.3)

a. Is determination if fingerprint analyses have been "consistent with the waste's initial properties" (page C-53) used in meeting this requirement and if so how?

fingerprint is compared to the profile

b. Or does the permit bar using this to limit annual re-analysis?

NA

2. Does the facility use any outside labs? If so, how is compliance with Permit condition B.3 documented?

Yes appel and DAT, a copy of the audit report

3. How does the facility ensure and document that no "prohibited wastes" are accepted?

a. PCBs (diluted PCBs?) *L 50 P/B are accepted, all are tested*

b. Dioxins (<LDR standards; e.g., status of K174) *Dioxins only accepted if meet*

LDR standard
c. Infectious waste *profile review, generator certificate*

d. Chemical Warfare Agents *profile review*

e. Radioactive wastes *background, testing, profile review*

f. Compressed gases
-Is vapor pressure measured or calculated?

no

-Definition of STP (e.g., is temperature 20 C as on page C-3?)

-How are waste codes U153 (B.P. 6 C) and U115 (B.P. 11 C) classified?

* g. Benzene concentration > 10% *currently there isn't a 90 limit for Benzene - removed restriction for*

4. How does the facility ensure and document that "restricted wastes" are properly classified and managed? What are the facility's criteria for such evaluations? *permit*

a. Shock sensitive
b. Temperature sensitive } *profile review, process, special handling assignment*

Don V / BK

- c. Explosive
- d. Water reactive
- e. Air reactive

} some as A + B previously

What sources of information are used to make these determinations?

MSDS's, generator + processor knowledge

How is each of the above hazard types restricted?

Keep ready packages, adjust feed rate, process quickly

What documentation is maintained?

waste stream surveys, MSDS's

How are these issues addressed in "blanket profiles"?

Stay away from blanket profile for these

5. Miscellaneous special wastes (MSW)

- a. Who makes determination?

approval group

- b. What criteria are used? What is the facility definition of "present extraordinary health and safety hazards to the sampler or laboratory technicians"? (Page C-25)

History, any of questions for materials

- c. How is standard of the generator will supply VRA with sufficient chemical and physical characteristic information for proper management of the [MSW] waste" met? (Page C-22) How does it differ from standard data requirements standard?

- d. Who determines if a waste is MSW?

Approvals

- e. How is MSW approval process documented?

sheet

- f. What per cent of facility waste profiles and waste shipments are "Category 3" MSW?

IT Group may be able to run a query

How are these issues addressed in "blanket profiles"?

Don v / Bl

6. Waste approval process

- a. How often do incineration operation personnel review waste profiles?

operation signature on every profile

- b. What documentation of waste profile review and approval or disapproval is maintained?

file - review sheet, O EPA signature

7. Waste Acceptance Procedures (Section C-2e(1))

- a. How is visual inspection process documented?

physical state, color, layering

- b. What criteria are used for a discrepancy from a visual inspection? What is facility criteria for an "obvious difference"? (Page C-59)

if it doesn't match what they're seeing

- c. What constitutes a discrepancy?

same as 7 b

- d. What actions are taken in case of a discrepancy?

noted and e-mail sent to customer service rep.

- e. How is the discrepancy process documented?

e-mail and discrepancy data base

8. How is metals content in waste shipments determined to be consistent with the profile if waste is not on the list to be sampled because metals are thought to exceed the preset values?

process knowledge, generator knowledge

9. How is evaluation of waste water used in facility process documented?

some is based on where its generated from, fingerprint sheets

10. Lab Packs

- a. How are contents compared with the packing list? How is this documented?

highlight container packing slip, inventory sheet comparison

- b. How are inspections conducted for discrepancies?

if a major discrepancy is found all contents are inspected

- c. Who determines if any discrepancy is major or minor? How is this documented?

It is in the permit

major discrepancy is a 10% difference or greater

Don ✓ / BL

- d. What actions are taken in case of a discrepancy? How is this documented?

Documented in the database, if major 100%

- e. How does the alternate auditing plan work?

40% inspected as long as discrepancy rate < 10%

11. Loose Packs

- a. How are contents compared with the packing list? How is this documented?

Evaluated in the lab

- b. How are inspections conducted for discrepancies?

same as normal lab procedures

- c. Who determines if any discrepancy is present? How is this documented?

lab chemist, noted in lab tracking system

- d. What actions are taken in case of a discrepancy? How is this documented?

depends on nature of discrepancy, will after check with customer service

12. Possible Queries

- a. List of waste shipments rejected because they were discrepant

the list of all rejected shipments is in database but not the reason

- b. List of waste profiles that were not approved by the facility and reasons for not approving

taken care of before it enters into the system

- c. Percent of facility profiles that are "blanket profiles" - probably could

get a profile

- d. List of waste shipments that include waste codes on Table C-1a(2).

all in data base

- e. List of waste shipments that include waste codes on Table C-1a(3).

all in data base

- f. List of waste shipments that are "Category 3" MSW?

all in data base

TSD LDR CHECKLIST

TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS

1.	Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-13? [3745-270-07(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745 27 007(B)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Are wastes or treatment residues being sent to another TSD to be further managed? If so:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)]	Yes
5.	Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Has the treatment facility (recycler) sent to the director a notice (with information listed in 3745-270-07(B)(3) excluding the manifest number), with each shipment of waste? [3745-270-07(B)(6)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Has the treatment facility (recycler) sent to the director a certification (as described in 3745-270-07(B)(4)), with each shipment of waste? [3745-270-07(B)(6)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
7.	Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Copies of all notices and certifications required in 3745-270?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	The testing frequency specified in the facility's WAP and have they followed the protocol?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

HAZARDOUS DEBRIS - do not apply exemption / make no distinction between -

8.	Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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

11.	Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Was immobilization the last treatment technology used? [3745-270-45(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	Is the waste a PCB waste under 40 CFR Part 761? If so:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Has the residue from the treatment of hazardous debris been disposed of in	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

* key waste + key debris
 * WTA does not accept waste containing > 50 ppm PCBs, and so 3745-270-45 does not apply

	accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)]		
14.	Does the owner/operator of a treatment facility that claims the debris is excluded from regulation as a hazardous waste under 3745-51-03(F)(1) maintain the following information?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a.	Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	Does the notification of an owner/operator who first claims the debris is excluded under 3745-51-03(F)(1) have the following information: [3745-270-07(D)(3)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a.	Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Technology used from Table 1? [3745-270-07(D)(1)(c)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
16.	Has the above notification been sent to the director? [3745-270-07(D)(1)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

~~Full check~~ ~~no~~ ~~separately~~ ~~removes used oil~~ PN Sward + CB

**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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: For example, used oil contaminated scrap metal stored in a pile.

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if 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 <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>not tested</i>
----	--	---

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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Stopped the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

ON-SITE BURNING IN SPACE HEATER

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	<i>No</i>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

WTT does not generate used oil. Any oil generated from oil changes, etc. is taken off-site by the company that services the vehicles.

b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

GENERATOR TRANSPORTATION

11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transport used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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

13.	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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.

WTT accepts used oil from off-site generators + treats it as hazardous waste. If it is stored on-site prior to incineration, it is managed as a haz waste. Used oil may be fuel blended on-site, but again, it is managed as a haz waste w/rt container management (labeling, tracking, condition of container, keeping the container closed at all times unless waste is being added to or removed, segregation, etc.)

LARGE QUANTITY GENERATOR REQUIREMENTS

PN

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

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

Safety Equipment Used:

GENERAL REQUIREMENTS

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

- 8. Does the generator accumulate hazardous waste? Yes No N/A

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

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

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

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

NOTE: Complete appropriate checklist for each unit.

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

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

MANIFEST REQUIREMENTS

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

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

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

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

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

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

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

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



17. If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, the generator contact the transporter and 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)] *no exceptions in 6 mo* 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

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: 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

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

