



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

June 26, 2007

Ms. Allison Knowles
Von Roll America, Inc.
1250 Saint George Street
East Liverpool, OH 43920

**RE: VON ROLL AMERICA, INC., COLUMBIANA COUNTY, OHD 980 613 541
HWFB # 02-15-0589, RCRA LQG/TSD INSPECTION,
COMPLIANCE EVALUATION INSPECTION, NOTICE OF VIOLATION**

Dear Ms. Knowles:

On April 23, 24, 25, and 27, 2007, the Ohio Environmental Protection Agency (Ohio EPA) conducted a semi-annual compliance evaluation inspection (CEI) of the Von Roll America, Inc. (VRA) facility in East Liverpool, Ohio. Followup meetings were held on May 2 and 3, 2007, to continue discussions. We inspected VRA to determine compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). Ohio EPA's inspection included observation of facility operations during a walk through inspection and a review of written documentation of the facility's operating record, e.g., incident reports, training program, inspection records, manifests for waste received and waste transported off-site.

We found the following violations of Ohio's hazardous waste laws. In order to correct these violations you must do the following and send me the required information ***within 30 days of the date of this letter:***

1. **OAC Rule 3745-55-77(C) - Special Requirements for Incompatible Waste:** A storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers... shall be separated from the other materials or protected from them by means of or other device.

Inspectors observed an incompatible container incorrectly stored among flammable waste (#630454 in bin I28) on April 23, 2007. The container of oxidizer waste had been incorrectly labeled as flammable, and placed into storage with flammable waste. Once it was discovered that the container held oxidizer waste, a new label was generated and placed on the container, but the container was not actually moved from the flammable waste and placed with the oxidizer waste (bin A16A) until April 25, 2007.

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VON ROLL AMERICA, INC.
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Ohio EPA is concerned by the error in waste identification and labeling which resulted in incompatible waste not being segregated properly. Please provide an explanation for the example mentioned above. Please evaluate work practices to reduce the potential for incorrect identification and/or proper segregation of incompatible waste and describe any improvements made. Please submit documentation of retraining regarding incompatible waste, proper segregation of incompatible waste from other waste, and re-labeling/moving containers of incompatible waste when discovered.

2. **OAC Rule 3745-54-15(D), General Inspection Requirements:** The owner or operator must record inspections in an inspection log or summary. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

During review of the inspection records, it was noted that several inspection forms were not fully completed. The Daily Perimeter Check for 12/25/2006 through 12/31/2006 was initialed, dated, and signed by a manager, but the form didn't include notations on the condition of the fence, gates, signs, and lighting for 12/29 through 12/31. Another inspection form, the BOP Daily/Weekly on 1/22/2007, was not initialed on subsequent pages after the first page. The Plant Sprinkler/Radio form completed on 1/23/2007 did not include the time.

Eye wash #6, located in the Four Stage Wet Scrubber building, was found to have a corroded (inoperable) foot pedal chain while the hand mechanism was operable. However, recent inspection forms had not noted an issue with the foot pedal. This is both a safety issue and an inspection issue. In addition, during the CEI, most of the eye wash stations were visually evaluated and found to not be clean underneath the protective cups that cover the eyewash mechanism. Due to plant conditions, including normal dust and dirt, the eyewash (especially under the cups) should be cleaned periodically or as needed to maintain a reasonable level of cleanliness.

The issue of incomplete inspection forms was mentioned as a concern during previous CEIs. VRA must continue to minimize occurrences where inspection forms are not completed in entirety. Please provide an explanation for the examples mentioned above and describe any improvements made. Please revise the Safety Shower/Eye Wash form to emphasize cleanliness and note whether both the foot pedal/chain and the hand mechanisms are operable. Please submit documentation of retraining regarding the completion of inspection forms.

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General Comments and Concerns:

During the inspection, the following comments and concerns were noted. Please provide the requested information/documentation ***within 30 days of the date of this letter:***

1. **Waste identification issues:** Four bottles of arsenic trioxide waste were observed in the Lab Pack Building, under the hood, without a label or identifying information. A bottle of mercury trioxide was also observed in the same location, with a profile number but no label or other identifying information. After investigation, it was determined that the bottles had been removed from lab pack containers and set aside to manage separately. However, sufficient identifying information was not provided with these containers at the time they were placed in the hood.

Although lab pack personnel were aware of the waste type and other relevant information, Ohio EPA is concerned the waste labeling and/or identification was not readily available for other personnel including Ohio EPA. Please provide an explanation for why the containers mentioned above were not labeled. Please evaluate work practices to reduce the potential for unidentified waste and describe any improvements made to ensure containers are properly labeled. Please submit documentation of retraining regarding proper identification and labeling of hazardous waste.

2. **North Wall of the Container Processing Building:** In the Container Processing Building, portions of the North Wall are utilized as staging areas for containers that require attention prior to incineration, such as splitting, re-labeling, resolving discrepancies, or processing by an alternate method. Ohio EPA has noticed a few issues with the containers placed along the North Wall.
 - a. Discrepant containers are placed in an area along the North Wall referred to as Bob's Wall. During the inspection, Ohio EPA observed 6 containers in this location that had not been noted on the tracking log (clipboard). This has been noted in the past, and since the inspection, on other occasions.

The tracking log is supposed to include the date the container is placed at this location, the container number, the name of the person who placed the container there, and the reason for the discrepancy, and the resolution. Please provide an explanation for observations when containers are not listed or the information on the tracking log is incomplete. Please add the "date of resolution" to the resolution column on the tracking log. Please describe any additional measures taken in regards to this issue. Please provide documentation of retraining on the tracking log (clipboard) for containers placed in this area.

- b. During the inspection, a container was noticed on the west end of the North Wall (#716651). This container had been split on approximately March 26th, but needed the solids removed. Before further processing could occur, a safety protocol for this waste stream needed to be written.

Please develop a standard operating procedure (SOP) or modify an existing SOP to address containers that need special attention prior to continued processing and provide a copy of that SOP to Ohio EPA.

3. **Leaking slag boxes:** Ohio EPA has expressed concern regarding slag boxes leaking liquid from the back end while being filled with slag at the slag conveyor. Slag boxes from a particular manufacturer are more difficult to seal completely to prevent leakage. The slag conveyor and slag boxes are located in areas with secondary containment. However, these boxes continue to be utilized by VRA on a regular basis, resulting in leaks while on-site.

Please evaluate this situation and propose a solution, which may include a schedule for phase-out of the use of the slag boxes that do not seal completely.

4. **Concrete maintenance program:** VRA has committed to an ongoing concrete maintenance program designed to maintain the sealant in the expansion joints between concrete pads and in any surface cracks in concrete within the facility.

Please provide an update on the concrete maintenance program, including scheduled maintenance. Please provide a copy of the inspection form being developed by VRA to improve tracking of areas in need of repair.

5. **Fire Insulation:** The fire insulation had been removed from a vertical support beam (to add another support beam) by the steps leading up to the Queuing Lane Tunnel. The fire insulation has been replaced at this location since the inspection. VRA indicated other locations throughout the facility would be evaluated to determine if any replacement or repairs to the fire insulation were necessary.

Please provide an update on fire insulation replacement/repairs that were recently completed. Please compile a list of locations still needing repairs to the fire insulation and submit a proposed schedule for the repairs and/or documentation of completed repairs in response to this concern.

6. **Housekeeping issues:** During the inspection, numerous issues were noted related to housekeeping. While none of these issues were individually of great concern, the large number of housekeeping issues observed indicates that better practices could be instituted by the facility. Some (not all) of the housekeeping issues included:

MS. ALLISON KNOWLES
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- a. Used personal protective equipment (ppe) apparently discarded on top of clean sample jars and a pile of used ppe in the southwest corner of the Maintenance/Electrical room east of the North <90 day Area, in Brass Alley, throughout the Incineration System, and in the storage area west of the Tank Farm;
- b. Partially used aerosol cans laying on the ground in Brass Alley, and in other locations throughout the facility;
- c. Cigarette butts thrown into the river sump in Brass Alley, rather than being placed into the receptacle provided;
- d. Incandescent light bulbs and trash in the scrap metal recycling bin located in Brass Alley;
- e. A pail of oily liquid left after pump maintenance on the 2nd floor of the Incinerator Feed Building, a pail of oily liquid in the W9/W10 Building, and a pail of grease and ppe by the Hydropulper with no label or lid;
- f. Dirty tools not placed into receptacles to contain waste residual that may have been on the tool;
- g. Holes in the metal screen (grating) over the sump in N<90 Day Area were plugged with debris and/or waste;
- h. Containers holding re-usable materials such as chains, not covered and also holding rainwater. This situation could lead to deterioration and/or rusting of re-usable materials and provide mosquito breeding locations (especially in Brass Alley);
- i. Used ppe, unlabeled containers of materials, products, or non-hazardous waste, and oily absorbent under the bins in the Maintenance/Oil Storage Building, and
- j. Leaks from corroded piping for the water conditioning equipment were noted in the steam plant.

Please provide a description of measures taken in regards to the issues listed above and describe any improvements made. Please submit documentation of retraining if appropriate.

The incident that occurred on June 19, 2007, will be followed up as a separate issue from this CEI.

MS. ALLISON KNOWLES
VON ROLL AMERICA, INC.
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Enclosed you will find a copy of the checklists that were completed during the inspection. If you have any questions, please contact me at the Ohio EPA field office in East Liverpool at (330) 385-8421 or at the Northeast District Office at (330) 963-1234. You can find copies of the rules and other information on the division's web page at: <http://www.epa.state.oh.us/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/opp>.

Sincerely,



for Michelle Tarka
Environmental Specialist
Division of Hazardous Waste Management

MT:ddw

Enclosure

cc: Frank Popotnik, DHWM, NEDO
Natalie Oryshkewych, DHWM, NEDO
Patricia Natali, DHWM, NEDO
Tammy McConnell, DHWM, CO
Harry Sarvis, DHWM, CO
Will D'Amico, Region V, US EPA

keywords: NOV, cei, spring 07,

NOTICE:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

6/10 - 6/12
inspection

letter 6/26/2007

STATE PART B PERMIT
INSPECTION CHECKLIST
(FINAL)

WASTE TECHNOLOGIES INDUSTRIES

OH0980613541, 02-15-0589

Gunnars (lab QA/QC, WAP)

Neil (manifests, LDR req etc)

John (tank stor, stor cont, records/entry, gen accum)

Michelle (mods, gw, insp, closure)

Patricia (licensing, pers training, perm compl, facil oper, config)

JANUARY 21, 1993



OHIO PART B PERMITTED FACILITY RCRA INSPECTION CHECKLIST

Von Roll America Inc a/k/a

Facility: Waste Technologies Industries
Address: 1250 St. George Street
East Liverpool, Ohio 43920

Ohio Permit: 02-15-0589
USEPA ID: OH0980613541

County: Columbiana

Facility Phone: 330-385-7336

Inspection Date: 6/10-12, 2002

Time: 9:30

Advanced notice of inspection given to the Permittee? (yes) ___ (no) X
If yes, how long in advance? ___

Disposal Restricted wastes managed? (yes) X (no) ___
If yes, complete LOR checklist.

Does the Permittee act as a generator? (yes) X (no) ___
If yes, complete the applicable sections of the Generator Requirements checklist for wastes being managed under generator status.

CONTACTORS:	Name	Agency/Title	Phone
	Michelle Tarka	Patricia Natali (ELFO)	330-385-8421
	Neil Wasilk	John Paquette	Gunars Zikmanis (NEDO)
PERMITTEE REPRESENTATIVES:	Dave Cuppett	Sean Sweeney	Becky Dalrymple, Carrie Patton

PERMIT STATUS

Issued: February 16, 1984
Effective Date: April 27, 1984 (Date of Journalization)
Expiration Date: Five years after approval of trial burn results 5/15/2002

AUTHORIZED ACTIVITIES

- Tank
- Injection Wells
- Surface Impoundment
- Landfill
- Incinerator
- Land Application
- Thermal Treatment
- Surface Impoundment
- Other



REMARKS - GENERAL INFORMATION

Include a list of the wastes being generated/managed at the facility and a brief description of site activity and waste handling procedures:

See following Page



REMARKS - GENERAL INFORMATION

Include a list of the wastes being generated/managed at the facility and a brief description of site activity and waste handling procedures:

Von Roll America, Inc. ^{a/k/a} WTI operates a commercial hazardous waste incinerator in Columbiana County, East Liverpool, Ohio. Since 1992, the facility has accepted characteristic hazardous wastes and listed hazardous wastes and is presently permitted to accept over 480 hazardous waste codes. The facility is not permitted to accept dioxin-bearing waste, PCBs in concentrations greater than 50 ppm, waste with benzene in concentrations greater than 10%, compressed gases, asbestos, radioactive wastes, war gases, and several types of wastes which carry P and U waste codes. In addition, they are not permitted to store waste characterized as Class 1A flammable, i.e., flashpoint < 73 and boiling point < 100 degrees Fahrenheit.

VRA/WTI accepts a broad range of off-site generated hazardous and non-hazardous wastes from generators throughout the country. The facility uses a rotary kiln incinerator for thermal destruction and incinerates from 50,000 up to 88,000 tons of waste annually. Waste is sampled prior to acceptance and is fingerprinted upon receipt (there are some exceptions to this requirement). Analysis of the waste for predetermined parameters is performed on-site at the VRA/WTI laboratory.

VRA/WTI treats liquid, solid and semi solid waste that is received in containers or in bulk. The facility also receives consumer packaged materials and lab packs. Bulk liquids can be transferred to the facility's tank farm for storage and blending or fed directly to the incinerator. Bulk solid shipments are transferred to bulk solid storage tanks. Depending upon the contents, containers may be processed directly to the incinerator, transferred to the bulk solid tanks, blended in pumpout tanks, consolidated into skip hoist containers, split into smaller charges, or processed through the facility's extruder unit which transfers the waste to a storage tanks. VRA/WTI also acts as a intermediary storage facility for some waste they are prohibited from treating such as waste with high concentrations of arsenic and mercury.

VRA/WTI generates treatment residues, slag and ash, in the incineration process. The residue is sampled and analyzed on-site. The results are compared to LDR standards and, depending upon the findings, may be reprocessed through the incinerator system, shipped off-site for further treatment or shipped to a hazardous waste landfill (if LDR standards are met). Other on-site generated hazardous waste include clean up materials, lab waste and personal protective equipment, all of which is treated through incineration. Brick from the primary and secondary combustion chambers is a hazardous waste generated when the system is relined, typically once a year. The brick is shipped off-site to a hazardous waste landfill for final disposition.



PMW

GENERAL CONDITIONS OF PERMIT

SUBMITTALS REQUIRED PRIOR TO STORAGE OR TREATMENT OF HAZARDOUS WASTE AT THE FACILITY

The following portion of the inspection checklist must be completed during the first inspection after operation of the facility has begun. Operation of the facility is the storage and/or treatment of hazardous wastes. This portion of the checklist may be completed after the initial inspection after the beginning of operations of the facility and should be made a permanent part of the facility file.

	Y/N/NA	RMK#
<p>Did the Permittee submit facility construction and site elevation and construction plans and underground utility relocation plans for the facility at least ninety (90) days before commencing actual construction and elevation of the facility? [Conditions F.2., B.33. and B.37.]</p>	Y	
<p>RE: Facility construction plan means final process and instrumentation drawings and final facility layout.</p>		
<p>Prior to storage or treatment of hazardous waste at the facility, did the Permittee submit to the Ohio EPA, by certified mail or hand delivery, a letter signed by a registered professional engineer stating that the hazardous waste management units have been constructed in compliance with the permit? [Condition A.15.(i)]</p>		
<p>RE: The Ohio EPA shall inspect the facility and notify the Permittee of its findings within ninety (90) days of receipt of the aforementioned letter.</p>		
<p>At least one hundred eighty (180) days prior to operation, did the Permittee submit and receive approval by the Ohio EPA for the following [Condition A.25.a):</p>		
<p>(a) An updated personnel training program?</p>		
<p>(b) An updated list and location of emergency equipment?</p>		
<p>(c) An updated waste analysis plan and waste analysis, including master instructions for the specific wastes?</p>		
<p>RE: The Ohio EPA must complete its review and issue any required action within one hundred eighty (180) days of receipt of complete submittals.)</p>		



PMN

Y/N/NA RMRCS

At least sixty (60) days prior to operation of the facility, did the Permittee submit the following (Condition A.25.b):

(a) Demonstration of financial assurance for closure and for liability coverage in accordance with Rules 3745-55-43 and 3745-55-47 of the OAC respectively?

Y

Compliance with the aforementioned financial assurance requirements as determined by the Compliance Monitoring and Enforcement Section.

(b) An updated contingency plan?

(i) Has the plan been approved by Ohio EPA?

(c) An updated closure plan?

(i) Has the plan been approved by Ohio EPA?

(d) An updated general inspection schedule including a detailed inspection schedule and inspection log form? and;

(e) Copies of arrangements with local authorities or their refusal to enter an agreement?

8: The Ohio EPA shall issue its approval within sixty (60) days of receipt of complete submittal of the documents required above.)

Prior to storing and/or treating hazardous waste at the facility did the Permittee submit to the Ohio EPA a certification from a qualified engineer stating that: [Condition B.34.]

(a) The site has been filled and elevated to a height of 695 feet above mean sea level?

(b) The fill is clean?

(c) The fill has been compacted with a maximum permeability of 1.75×10^{-4} cm/sec?

(d) The hazardous waste management units have been designed in accordance with the results of the Geotechnical Study completed as required in Condition B.33.? and,

(e) The earthen berm surrounding the facility and the blanket of river gravel on the bank of the culvert northeast of the facility have been installed as required by Condition B.33.?

Vertical line with horizontal tick marks for data entry.





PMN

Y/N/NA

RMK#

(e) Did the Permittee construct an earthen berm of clean compacted fill with a maximum permeability of 1.75×10^{-4} cm/sec, with an elevation of at least 695 feet above mean sea level around the perimeter of the site, except where roads and the WTI railroad spur line cross the boundary of the facility and where the boundary line passes through the building west of the facility?

Did the Permittee construct the exhaust stacks at the facility to be at a height of one hundred fifty (150) feet above the elevation of the base of the stack? (Condition B.36.)

Did the Permittee construct the exhaust stacks to have their base at a minimum of 695 feet above sea level? (Condition B.36.)

Did the Permittee construct the exhaust stacks at the facility to have their outlets below 850 feet above sea level? (Condition B.36.)

Did the Permittee submit plans to the Ohio EPA at least ninety (90) days before relocating existing underground utilities on the site of the facility that will be directly beneath the active process areas at the facility or outside of the 21.5 acre site? (Condition B.37.)

Y	

REMARKS



Neil

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

Trial Burn Approval in 1997

MAY 2002

	Y/N/NA	RMR#
Has the expiration date of the permit passed? If so,	<u>X</u>	_____
(a) Is the Permittee continuing any activity regulated by the permit after the expiration date of the permit?	<u>X</u>	_____
(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? (Condition A.6.)	<u>X</u>	_____
Has the Permittee submitted the annual permit fee, payable to Treasurer of the State, to the Ohio EPA on or before the anniversary of the date of issuance during the term of the permit? (Condition A.24.)	<u>X</u>	_____
Is the Permittee conducting any hazardous waste management activities (not otherwise exempt by law) which are not authorized by the permit? (Condition A.1. and A.5.)	<u>X</u>	_____
Have any provisions of the permit been identified as invalid? (Condition A.4)	<u>Y N</u>	_____
Has the facility identified any instances of noncompliance with the permit, ORC Chapter 3734 or the rules adopted thereunder, which may endanger human health or the environment? If so,	<u>N</u>	_____
(a) Did the facility immediately report the following to Ohio EPA Emergency Response Section: (Condition A.13)		
i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies? and,	<u>NA</u>	_____
ii. Information concerning a release of hazardous waste, fire or explosion at the facility which could threaten human health and the environment, including a description of:		
a. name, address and telephone number of the owner or operator?		_____
b. name, address and telephone number of the facility?		_____
c. date, time, type and source of release?		_____





Y/N/NA

RMK#

(c) 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.)

N/A _____

Has the Permittee planned any changes in the permitted facility or activity which may result in noncompliance with the Conditions of the permit?

N _____

(a) If so, has the facility provided Ohio EPA with advance notice of such changes? (Condition A.16.)

N/A _____

: Such notification does not waive the Permittee's duty to comply with the permit pursuant to Condition A.5.

REMARKS



Michelle

PERMIT MODIFICATION, REVISION, REVOCATION

	Y/N/NA	RMK#
Has the Permittee filed a request for a permit modification, revision or revocation since issuance of the permit? (Condition A.2.)	<u>Y</u>	_____
Has the permit been transferred to a new owner or operator? (Condition A.17.)	<u>N</u>	_____
(a) If so, has the transfer been conducted in accordance with ORC Chapter 3734 and the Rule adopted thereunder? (Condition A.17.) and;	<u> </u>	_____
(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 Rule? (Condition A.17.)	<u> </u>	_____
Has the Permittee submitted reports of compliance or non-compliance with, or any progress reports on the requirements contained in any compliance schedule of the permit to the Ohio EPA no later than (14) days following each scheduled date, unless otherwise specified? (Condition A.18.)	<u>Y or NA</u>	_____
Has the Permittee furnished relevant information which the Ohio EPA has requested to determine whether cause exists for <u>modifying, revising, revoking</u> or suspending the permit, or to determine compliance with the permit? (Condition A.10.)	<u>Y</u>	_____
Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? (Condition A.10)	<u>Y</u>	_____
Has the Permittee become aware that it failed to submit any relevant facts in the permit or issuance proceedings or that it submitted incorrect or incomplete information in permit issuance proceedings or other submissions to Ohio EPA or Ohio HWFB? If so,	<u>N</u>	_____
(a) Has the Permittee promptly submitted such facts or corrected information to the appropriate entity? (Condition A.22.)	<u> </u>	_____

*comply with
Air VWF instead
of RCRA BB+CC!
Y or NA*

*- mods which
have changed
the permit
(ex - wap)*

*- no transfer of ownership
has been a change in stock ownership, not the
same thing*



Y/N/NA

REMARKS

In accordance with Condition A.11. of the permit, is the Permittee maintaining records of:

- (a) All calibration and maintenance records and all original strip chart recordings from continuous monitoring instrumentation, for three (3) years?
- (b) Copies of all reports and records required by the permit, for at least three (3) years from the date of sample measurement, report or record?
- (c) All data used to complete the approved application and any supplements, revisions or modifications of the application, for the life of the facility?

Y _____
Y _____
Y _____

Is the Permittee retaining a complete copy of the approved application on-site? [Condition A.13.]

Y _____

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

Y _____

- (a) If so, has the Permittee given notice to the Ohio EPA of such alterations/additions? [Condition A.14]

Y _____

by submitting MODS

Has the Permittee commenced management of hazardous waste at the facility or has the Permittee modified any portion of the facility? If so,

Y - 1993/1994

- (a) Prior to management of wastes, did the Permittee submit a ~~certified~~ letter signed by the Permittee and a registered, independent P.E., stating that the facility has been constructed or modified in compliance with the applicable conditions of the permit and the approved application? [Condition A.15.(a)(i)]

Outdated questions

Y _____

- (b) Did the Permittee construct the modified portion of the facility in accordance with the Conditions of the permit and approved application prior to managing waste? [Condition A.15.(a)(ii)]

Y _____

The Ohio EPA shall complete the inspection and notify the Permittee of its findings within ninety (90) days of receipt of the letter described in Question 10.(a).

REMARKS





State of Ohio Environmental Protection Agency
Northeast District Office

2110 E. Aurora Rd.
Twinsburg, Ohio 44067

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www.epa.state.oh.us

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

ELiv field office

FAX COVER SHEET

To: Frank Popotnik Fax: _____
Organization: DEPA - Nedo Phone: _____

From: Michelle / Patricia Phone: _____
Date: _____ Pages: _____

Subject: _____
 Urgent Reply ASAP Please Comment For Your Records

Comments:



Jan 11



SITE ENTRY - AVAILABILITY OF RECORDS

Y/N/NA

RMKS

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

- (a) Enter at reasonable times upon the premises where a regulated activity is located or where records are kept under the conditions of the permit?
- (b) Have access to and copy any records required to be kept under the conditions of the permit?
- (c) Inspect facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit?, and
- (d) Sample or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized under ORC Section 3734?

Y	
Y	
Y	
Y	

REMARKS



RECORDKEEPING REQUIREMENTS

RATING RECORD

Y/N/NA

RMCH

In accordance with OAC Rules 3745-54-73 and 3745-54-74 of the permit, does the Permittee maintain an operating record which contains the following information:
[Condition B.18.]

- | | | |
|--|----------|-------|
| (a) A description of the quantity of each hazardous waste and method(s) and date(s) of its treatment or storage? | <u>Y</u> | _____ |
| (b) The location of each hazardous waste and quantity at each location? | <u>Y</u> | _____ |
| (c) Records and results of waste analyses? | <u>Y</u> | _____ |
| (d) Summary reports and details of all incidents that required implementation of the contingency plan? | <u>Y</u> | _____ |
| (e) Records and results of inspections? | <u>Y</u> | _____ |
| (f) For off-site facility: Notice to generators that the Permittee has appropriate permit to accept their waste? | <u>Y</u> | _____ |
| (g) An annual certification that Permittee has a program in place to reduce volume and toxicity of wastes generated? | <u>Y</u> | _____ |
| (h) Documents required to be maintained by land disposal restriction requirements of Chapter 3745-59? | <u>Y</u> | _____ |

COMMENTS TO BE MAINTAINED AT THE FACILITY

Is the Permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents: (Condition A.26)

- | | | |
|--|----------|-------|
| (a) Waste analysis plan in accordance with OAC Rule 3745-54-13 and the conditions of the permit? | <u>Y</u> | _____ |
| (b) Contingency plan in accordance with OAC Rule 3745-54-53 and the conditions of the permit? | <u>Y</u> | _____ |
| (c) Closure plan in accordance with OAC Rule 3745-55-12 and the conditions of the permit? | <u>Y</u> | _____ |
| (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 O.C. financial assurance personnel) | <u>Y</u> | _____ |



RECORDKEEPING (continued)

Y/N/NA

RMK#

(a) Personnel training plan and records required by OAC Rule 3745-54-15 and the conditions of the permit?

Y

3

(E) Inspection schedules developed in accordance with OAC Rule 3745-54-15 and OAC Rule 3745-55-74 and the conditions of the permit?

Y

Have any of the documents identified in Question #2 been revised as required by the permit? If so,

Y

(a) Has the Permittee submitted the revision to Ohio EPA? (Condition A.26.(b))

Y

(b) Has the Permittee received approval in accordance with Ohio hazardous waste rules to make such changes? (Condition A.26.(b))

Y

Is the Permittee maintaining facility construction plans at the facility? (Condition F.2.)

Y

ANNUAL REPORT REQUIREMENT

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.20)

Y

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

Do the Permittee's records of monitoring information specify the following: (Condition A.12.(b))

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

Y

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

Y

(c) Data(s) analyses were performed?

Y

(d) Individual(s) who performed the analyses?

Y

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

Y

(f) Results of such analyses?

Y

Were monitoring samples and measurements representative? (Condition A.12.(a))

Y



BOOKKEEPING (continued)

Y/N/NA RMR#

Were the sampling and analyses methods used performed in accordance with the appropriate method from Appendix I of 40 CFR Part 261? [Condition A.12.(a)]

Y

Were the laboratory methods used those methods specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846, November, 1986; Standard Methods for the Examination of Water and Wastewater, Seventh Edition, 1989; Sampling and Analysis Methods for Hazardous Waste Incineration, First Edition, February, 1982 or an equivalent method that is specified in the waste analysis plan or an "equivalent method" as defined in OAC rule 3745-50-10? [Condition A.12.(a)]

Y

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

Y

(a) Have the submittals been signed and certified according to OAC rule 3745-50-42? [Condition A.23]

Y

REMARKS



John

MANIFEST REQUIREMENTS

Is the Permittee complying with the manifest requirements set forth in OAC Rules 3745-54-71 and 3745-54-76? [Condition B.18.]

Y/N/NA

RMKS

Y

If the Permittee received hazardous wastes 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: [Condition B.18., OAC Rule 3745-54-72]

(a) Noted the discrepancy on the manifest?

Yes

(b) Attempted to reconcile the discrepancy with the generator?

Yes

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

no discrepancy longer than 15 days.

NO

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

Yes

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

REMARKS



WASTE ANALYSIS REQUIREMENTS

NOTE: The following questions are based on the requirements of OAC Rule 3745-64-13, the conditions of the Permit and the waste analysis plan (WAP) approved on August 11, 1992.

	Y/N/NA	REMARKS
Is the Permittee following the procedures described in the waste analysis plan approved on August 11, 1992 (WAP) and conditions of the permit? [Condition B.3.(c)]	<u>Y</u>	_____

Has the Permittee submitted for approval to the Ohio EPA original waste analyses at least sixty (60) days prior to the first receipt of each new specific waste stream? [Condition B.3.(b)]	<u>Y</u>	_____
---	----------	-------

NOTE: The Ohio EPA shall complete action on the submittals within (60) days of receipt.

Is the Permittee received approval from Ohio EPA for all waste streams being received at the facility? [Condition B.3.(b)]	<u>Y</u>	_____
--	----------	-------

Before blended organic or aqueous wastes and control liquid are fed into the incinerator, has the Permittee determined all of the following, in accordance with the waste analysis plan: [Condition C.1]

- | | | |
|------------------------------|----------|-------|
| (a) Heating value? | <u>Y</u> | _____ |
| (b) Viscosity? | <u>Y</u> | _____ |
| (c) Percent ash? | <u>Y</u> | _____ |
| (d) Halogens and sulfur? and | <u>Y</u> | _____ |
| (e) Flashpoint? | <u>Y</u> | _____ |

REMARKS



	Y/N/NA	REMARKS
Has the Permittee analyzed nonpumpable liquids that contain sludge or gelled material for the following: (Condition C.1)		
(a) Heating value?	Y	_____
(b) Percent ash? and;	Y	_____
(c) Halogens and sulfur?	Y	_____
Has the Permittee determined the heat value of any auxiliary fuel used in the incineration of hazardous waste? (Condition C.2.)	Y	_____
Does the Permittee verify the waste analysis according to the quality assurance section of the waste analysis plan? (Condition B.3.(c))	Y	_____
Has the Permittee performed the following analyses:		
(a) Before storing and/or treating a hazardous waste has the Permittee obtained a detailed chemical and physical analyses of a representative sample of the hazardous waste in order to determine all the information that must be known in order to store and/or treat that hazardous waste in accordance with the requirements of OAC Chapters 3745-54 to 3745-57 and 3745-59 or the terms and conditions of its Ohio Hazardous Waste Installation and Operation Permit? (WAP Sections C-2a, C-2b and C-2e, OAC Rule 3745-54-13(A) (1))	Y	_____
(b) Analyses on incoming wastes to determine if it matches the identity of the waste specified on the accompanying on the manifest or shipping papers? (WAP Section C-2a, OAC Rule 3745-54-13(A) (4))	Y	_____
Does the Permittee use only the analytical test methods as specified in the approved facility waste analysis plan? (WAP Section C-2b, OAC Rule 3745-54-13(B) (2), Condition B.3.(c))	Y	_____
Does the Permittee obtain samples of wastes for analyses using the methods and equipment specified in the approved facility waste analysis plan? (WAP Section C-2c, OAC Rule 3745-54-13(B) (3) and (C) (2), Condition B.3.(c))	Y	_____



Y/N/NA

RMK#

Does the Permittee repeat the analyses required in OAC Rule 3745-59-12(A)(1) [WAP Section C-3d, Condition B.3.(a)]

(a) When the generator of the waste notifies the Permittee that the process generating the waste has changed?

Y _____

(b) Annually?

Y _____

Does the Permittee accept lab packs for incineration?

Y _____

(a) If so, did the Permittee obtain approval from Ohio EPA of a revision to the WAP that provides for sampling and analyses of lab pack wastes prior to acceptance of the waste? [WAP Section C-2e, Condition B.3.(c)]

NA #1

Does the Permittee reject wastes during the preacceptance phase for the following reasons: [WAP Section C-2e.4, Condition B.3.(c)]

(a) The measured radioactivity of the waste is above background levels?

Y _____

(b) The waste contains PCBs in excess of 50 ppm?

Y _____

(c) The concentration of benzene in the waste is >10%?

Y _____

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

Y _____

Does the Permittee submit a certification with each shipment of 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 3745-59-07(B)(5)]

Y _____

REMARKS

ARE LABPACKS BEING AUDITED AT THE CORRECT FREQUENCY AS STATED IN THE WAP.



Michelle

GENERAL INSPECTION REQUIREMENTS

Y/N/NA

REMARKS

Is the Permittee following the procedures and schedules described the inspection plan (application pgs. 7-1 through 7-17) and the approved updated inspection plan? (Condition B.5)

Y

*specific questions may added upon updated plan approval***

Does the Permittee remedy deterioration or any malfunctions discovered by an inspection, as required by OAC Rule 3745-54-15(C)? [Condition B.5.]

Y

Is the Permittee maintaining records of inspections as required by OAC Rule 3745-54-15(D)? (Condition B.5)

Y

REMARKS



ON-SCENE TRAINING [3745-52-34(A)(4)]

Bob Burch

The generator keeps records required by 3745-65-16(D) including:

- a) Job titles, as they relate to hazardous waste management, and the name of each employee filling each job
- b) Job description, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position
- c) Type and amount of both introductory and continuing training to be given to each person filling a position
- d) Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B)&(C)

Yes No ___ N/A ___ RMK# ___

Yes ___ No ___ N/A ___ RMK# ___

Yes No ___ N/A ___ RMK# ___

Yes No ___ N/A ___ RMK# ___

If the facility's business practices precludes written job titles/descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be used to document that all necessary employees have been trained.

Generator has a training program which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to their positions 3745-65-16(A)(2)

SOPs

Yes No ___ N/A ___ RMK# ___

In accordance with 3745-65-16(A)(3), the personnel training program includes instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with:

- a) Emergency procedures
- b) Emergency equipment
- c) Emergency systems - Randy Saddle Q profile

Yes No ___ N/A ___ RMK# ___

Yes No ___ N/A ___ RMK# ___

Yes No ___ N/A ___ RMK# ___

Does emergency training described in a, b, & c above include, where applicable: [3745-65-16(A)(3)(a-f)]

ER monitoring equip - Randy S

- a) Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment
- b) Key parameters for automatic waste feed cut-off systems SOP
- c) Communication or alarm systems ER procedures
- d) Response procedures for fire/explosions - ER SOPs
- e) Response to ground water contamination incidents "
- f) Shutdown procedures Incineration SOPs

Yes No ___ N/A ___ RMK# ___

Personnel training program is directed by a person trained in hazardous waste management procedures as required by 3745-65-16(A)(2)

Yes No ___ N/A ___ RMK# ___



SONNEL TRAINING - cont.

New employees receive training within 6 months after the date of hire (or assignment to a new position) as required by 3745-65-16(B)

Yes No ___ N/A ___ RMK# ___

Annual refresher training is provided to employees as required by 3745-65-16(C)

Yes No ___ N/A ___ RMK# ___

Training records for current personnel are kept until closure of the facility; training records for former employees are kept for at least three years from the date the employee last worked at the facility [3745-65-16(E)]

Yes No ___ N/A ___ RMK# ___

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

Job performed

Name of employee

Date(s) Trained

REMARKS



John

GENERATOR ACCUMULATION

Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? 3745-52-34; ORC 3734.02(E)(F)

Yes ___ No N/A ___ RMK# ___

SATELLITE ACCUMULATION AREA REQUIREMENTS [3745-52-34(C)(1)]

Satellite accumulation areas are

- a) At or near a point of generation?
b) Under the control of the operator of the process generating the waste?
c) Total quantities of all waste streams do not exceed 55 gallons
d) Quantities of acutely hazardous waste do not exceed 1 quart at any one time
e) Containers are marked with words "Hazardous Waste" or other words identifying the contents

Yes No ___ N/A ___ RMK# ___

The 55 gallon limit applies to the area itself, and not to each individual waste stream accumulated in the area. The inspector should refer to the Ohio EPA November, 1994 Guidance on the Location of Satellite Accumulation Areas.

Does the facility accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so,

Yes No N/A ___ RMK# ___

Did the generator comply with 3745-52-34(A) or other applicable generator requirements within (3) days? and;

Yes No N/A ___ RMK# ___

Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (1 quart) limit was exceeded?

Yes No N/A ___ RMK# ___

CONTAINER MANAGEMENT OF CONTAINERS

Containers are marked with the words "Hazardous Waste" 3745-52-34(A)(3)

Yes No ___ N/A ___ RMK# ___

Accumulation date is on each container [3745-52-34(A)(2)]

Yes No ___ N/A ___ RMK# ___

Are hazardous wastes stored in containers which are:

- a) Closed (except when adding/removing wastes) [3745-66-73(A)]
b) In good condition [3745-66-71]
c) Compatible with wastes stored in them [3745-66-72]
d) Handled in a manner which prevents rupture/leakage [3745-66-73(B)]

Yes No ___ N/A ___ RMK# ___

Is the container accumulation area(s) inspected weekly [3745-66-74] Note location in General Information section of checklist

Yes No ___ N/A ___ RMK# ___



the inspections described in Question #7 recorded in a log which contains the following information: [3745-66-74(B)]

- Date and time of inspection
- Name of inspector
- Observations made during the inspection
- Date/nature of any repairs or remedial action

Yes No ___ N/A ___ RMK# ___
 Yes No ___ N/A ___ RMK# ___
 Yes No ___ N/A ___ RMK# ___
 Yes No ___ N/A ___ RMK# ___

or ignitable and/or reactive hazardous waste(s):

Containers are located at least 50 feet (15 meters) from the facility's property line [3745-66-76]

Yes No ___ N/A ___ RMK# ___

Containers are stored separately from other materials which may interact with the waste in a hazardous manner [3745-66-77(C)]

Yes No ___ N/A ___ RMK# ___

TRANSPORT REQUIREMENTS

Waste is packaged/labeled in accordance with the applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32(A)]

Yes No ___ N/A ___ RMK# ___

Each container < 110 gallons has a completed hazardous waste label [3745-52-32(B)]

Yes No ___ N/A ___ RMK# ___

Before off-site transportation, generator placards or offers the appropriate DOT placards to the initial transporter [3745-52-33]

Yes No ___ N/A ___ RMK# ___

REMARKS



Michelle

READINESS AND PREVENTION [3745-52-34(A)(4)]

Facility operated to minimize the possibility of fire, explosion, or unplanned release of hazardous waste [3745-65-31]

Yes ___ No ___ N/A ___ RMK# ___

If required due to actual hazards associated with the waste, the facility has the following equipment: [3745-65-32(A)(B)(C)(D)]

- a) Internal alarm system
- b) Emergency communication device
- c) Portable fire control, spill control and decon equipment
- d) Water of adequate volume/pressure

Yes ___ No ___ N/A ___ RMK# ___
 Yes ___ No ___ N/A ___ RMK# ___
 Yes ___ No ___ N/A ___ RMK# ___
 Yes ___ No ___ N/A ___ RMK# ___

Emergency equipment tested (inspected) on a weekly basis and maintained as necessary [3745-65-33]

Yes ___ No ___ N/A ___ RMK# ___

Emergency equipment tests (inspections) are recorded in a log that includes the following information [3745-65-33(B)]

- a) Date and time of test
- b) Name of person conducting the test
- c) Observations made
- d) Date/nature of any repairs

Yes ___ No ___ N/A ___ RMK# ___
 Yes ___ No ___ N/A ___ RMK# ___
 Yes ___ No ___ N/A ___ RMK# ___
 Yes ___ No ___ N/A ___ RMK# ___

Personnel have immediate access to a communication device when handling hazardous waste (unless the device is not required under 3745-65-32) [3745-65-34]

Yes ___ No ___ N/A ___ RMK# ___

Adequate aisle space is provided for unobstructed movement of emergency or spill control equipment [3745-65-35]

Yes No ___ N/A ___ RMK# ___

Facility has attempted to familiarize emergency authorities with possible hazards and facility layout [3745-65-37(A)]

Yes No ___ N/A ___ RMK# ___

Where authorities have declined to enter into arrangements/agreements, the refusal has been documented [3745-65-37(B)]

Yes ___ No ___ N/A ___ RMK# ___

REMARKS



MANIFEST REQUIREMENTS

All hazardous wastes shipped off-site have been accompanied by a manifest (US EPA form 8700-22) [3745-52-20(A)]

Yes No N/A RMK#

(a) Item I and items (1) through (20) of each manifest have been completed [3745-52-20(B)]

Yes No N/A RMK#

E: US EPA form 8700-22(A) (the continuation form) may be needed in addition to form 8700-22. In these situations, item R and items (21) through (35) must also be completed. [3745-52-20(B)]

Manifest designates at least one permitted disposal facility [3745-52-20(C)]

Yes No N/A RMK#

E: 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(D)]

Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility?

Yes No N/A RMK#

a) If so, did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(E)]

Yes No N/A RMK#

Manifests have been signed by the generator and initial transporter [3745-52-23(A)(1)(2)]

Yes No N/A RMK#

Has the generator received a return copy of each completed manifest within (35) days of being accepted by the transporter? If not,

Yes No N/A RMK#

i) Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)]

Yes No N/A RMK#

j) If the manifest was not received within (45) days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]

Yes No N/A RMK#

Original copies of all manifests and any exception reports are being retained for at least 3 years [3745-52-40]

Yes No N/A RMK#

REMARKS



EMERGENCY PLAN [3745-52-34(A)(4)]

The facility has a contingency plan which describes the following:
[3745-65-52(A) through (F)]

(a) Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste
Yes No ___ N/A ___ RMK# ___

(b) Arrangements/agreements with emergency authorities [3745-65-37] Yes No ___ N/A ___ RMK# ___

(c) A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator Yes No ___ N/A ___ RMK# ___

(d) A list of all emergency equipment, including: location, physical description and brief outline of capabilities Yes No ___ N/A ___ RMK# ___

Karen Lyders

(e) An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary Yes No ___ N/A ___ RMK# ___

(f) If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the OAC requirements. [3745-65-52(B)]

(g) Is the plan designed 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 ___ RMK# ___

(h) Is a copy of the plan (plus revisions) kept on-site and has been given to all emergency authorities that might be required to participate in execution of the plan [3745-65-53(A)(B)] Yes No ___ N/A ___ RMK# ___

(i) Is the plan revised in response to rule changes, facility, equipment and personnel changes, failure of the plan or as required by the Director [3745-65-54] Yes No ___ N/A ___ RMK# ___

EMERGENCY COORDINATOR

(j) Is an emergency coordinator available at all times (on-site or on-call) [3745-65-55] Yes No ___ N/A ___ RMK# ___

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



CONTINGENCY PLAN - cont.

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 ___ RMK# #1

a) Was the contingency plan implemented? [3745-65-51(B)]

Yes No ___ N/A ___ RMK# ___

b) Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?

Yes No ___ N/A ___ RMK# ___

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 ___ RMK# ___

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

REMARKS

#1 See next page



John

LARGE QUANTITY GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

Have all wastes generated at the facility been adequately evaluated? [3745-52-11]

Yes No ___ N/A ___ RMK# ___

Has the generator obtained an identification number? [3745-52-12]

Yes No ___ N/A ___ RMK# ___

Were annual reports filed with OEPA on or before March 1st? [3745-52-41] *No, due to software problems*

Yes ___ No N/A ___ RMK#

TE IMPORT/EXPORT REQUIREMENTS

Does the generator import or export hazardous waste? *If so,*

Yes No ___ N/A ___ RMK# ___

a) Generator notified US EPA of export/import activity [3745-52-53]

Yes No ___ N/A ___ RMK# ___

b) Generator complied with special manifest requirements [3745-52-54]

Yes No ___ N/A ___ RMK# ___

c) For manifests that have not been returned to generator: An exception report has been filed [3745-52-55] *Have not had the problem.*

Yes No N/A ___ RMK# ___

d) Annual report submitted to US EPA [3745-52-56]

Yes No ___ N/A ___ RMK# ___

e) Export related documents being maintained on-site [3745-52-57]

Yes No ___ N/A ___ RMK# ___

GENERATOR CLOSURE REQUIREMENTS

Has the generator closed any < 90-day accumulation unit(s) since date of last inspection?

Yes ___ No ___ N/A ___ RMK# ___

a) *If so,* describe the unit(s) which the generator has closed:

b) Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]

Yes ___ No ___ N/A ___ RMK# ___

c) *If the generator has closed a < 90 day tank, closure must be completed also in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]*

d) Please provide a description of the documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standard:



Mitchell

POLLUTION PREVENTION

te to the Inspector: This checklist has been developed to help the division in gathering general information about pollution prevention practices initiated by companies across the state. Asking the company about each bullet point noted below the questions is not necessary. It is only necessary to ask the company the general questions about pollution prevention activities. If the company responds with one of the canned answers below, the appropriate box may be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided or in the remarks section.

Has the company undertaken any pollution prevention activities to reduce the amount of hazardous waste generated?

Yes ___ No ___ N/A ___ RMK# ___

(a) *If so*, what has the company done to minimize hazardous waste generation?

- A change in the process resulting in less waste
- A change in the product resulting in less waste
- Use of fewer and less toxic hazardous raw materials
- Better operations/improved housekeeping
- On-site recycling/reuse of hazardous materials
- Sending waste off-site for recycling/reuse
- Other activities (specify) _____

Scan
 1) *lead batteries - recycle thru universal auto taped over connectors*
 2) *fluorescent bulbs - use non-merc bulbs only - that can be put in trash, old*

(b) *If so*, what hazardous wastes have been addressed?

- Solvents
- Paint related waste
- Industrial process wastes (sludges, slags, contaminated waste waters, etc.)
- Contaminated oils/hydraulic fluids
- Off-spec chemicals
- Fluorescent light bulbs
- Used batteries
- Shop rags
- Other (specify) _____ ** incinerate*

kulbs are in labpt being sent offsite
 3) *computer equipment - try to give away*

(c) *If not*, why hasn't the company considered pollution prevention?

- The company just never thought about it
- Lack of information about the alternatives that are practical for them
- Lack of capital to make process changes
- Lack of internal management support
- The company does not generate enough hazardous waste to consider pollution prevention
- Other reason given (specify) _____

Does the company plan to do pollution prevention activities in the future?

Yes No ___ N/A ___ RMK# ___

Would the company be interested in receiving additional information from the Ohio EPA about pollution prevention?

Yes No ___ N/A ___ RMK# ___

REMARKS

ISO 14000 Certified
Helen Miles OPP did full evaluation of PR opportunities ~ 2 yrs ago



SECURITY PROVISIONS

Y/N/NA

RECR#

Is the Permittee complying with the following security provisions of OAC Rule 3745-54-14(B) & (C) and Condition B.4.:

(a) Does the Permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility? or:

Fence, gate, guard
Y _____

(b) An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility? or;

Y _____

(c) A means to control entry, at all times, through gates or other entrances, to the active portion of the facility?

Y _____

In accordance with OAC Rule 3745-54-14(C) and Condition B.4 of the permit, does the Permittee have signs reading "Danger-Unauthorized Personnel Keep Out" posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? (Condition B.4.)

Y _____

REMARKS



NIE

FACILITY OPERATION

Y/N/NA

REMARKS

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? (Condition B.1.)

Y

The following question pertaining to wastewater discharges to the East Liverpool, Ohio POTW was rendered moot when a spray drier for wastewater treatment was added to the facility added as a revision to the Permit on December 12, 1991.

Has the Permittee used its best effort to have the following issues addressed in an agreement with the City of East Liverpool regarding the effluent that the Permittee seeks to discharge to the POTW:

(a) The pretreatment of or the performance standards for, all pollutants, including U.S. EPA's priority pollutants which may have an adverse impact on the POTW or the quality of the Ohio River? and;

NIA

(b) A performance standard for phenols that does not adversely impact the POTW or cause a significant increase in the current background concentration of phenols in the Ohio River? (Condition F.6.)

NIA

Has the Permittee obtained all necessary environmental permits prior to beginning operation of the facility? (Condition F.1.)

Y

Is the Permittee complying with all environmental permits for the facility? (Condition F.1.)

Y

Does the Permittee accept for treatment at the facility only the types of hazardous wastes that are listed in the permit application (pages 2-17 through 2-19) and that have been approved under the waste product review specified in Condition B.3(b) of the permit? (Condition F.8.)

Y

Does the Permittee treat not more than 176,000 tons (total) in a year of hazardous wastes in the incinerators at the facility? (Condition F.8.(a))

Y

Does the Permittee treat not more than 83,000 tons per year of hazardous wastes in the inorganic waste treatment system at the facility? (Condition F.8.(b))

NIA

NEVER BUYAT



PLANT OPERATION (continued)

Y/N/NA

RMK#

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? (Condition F.8.(c))

N/A

Does the Permittee maintain compliance with Chapters 3704, 3714, and 6111 of the Ohio Revised Code and all Rules and standards adopted under these Rule? (Condition F.14.)

X

Does the Permittee ensure that hazardous wastes received at the facility are not shipped on the Ohio River? (Condition F.15.)

X

REMARKS



w/in 1st wk or 2 wks

- Safety stds
- SOP related to that job
- Intro to basic studies (specific to job)

PERSONNEL TRAINING

Y/N/NA REM#

Is the facility conducting personnel training in accordance with training plan (application pgs. 13-1 through 13-13) the approved updated plan, and the following requirements of OAC Rule 3745-54-16: (Condition B.6.)

Y _____

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

Y _____

Ask Larry

(b) The facility provides personnel training to new employees within 6 months after date of employment as required by OAC Rule 3745-54-16 (B)?

Y _____

(c) The facility provides an annual refresher training course as required by OAC Rule 3745-54-16 (B)?

Y _____

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.)

Y _____

REMARKS
w/in 1st week, try to get all imp. training, esp SOPs
Basic studies

last fit test 4/26/01
Curt still outstanding
Scott's fit test 4/4/02

- Curt Cox ✓
- Paul Mahan ✓
- Bob Burnett ✓
- Scott Strobel ✓
- Rich McConnell ✓
- Camille Pollin ✓

outstanding for annual but not for training essential to their job



Michelle

REQUIRED EQUIPMENT

Y/N/NA

RMK#

Has the Permittee furnished the facility with the equipment as specified and required by the permit application, the permit terms and conditions and OAC Rule 3745-54-32? (Condition 8.8.)

Y

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 plans and of the approved permit application? (Condition 8.8.)

Y

Is the Permittee maintaining access to the communication or alarm system as required by OAC Rule 3745-54-34, the permit application and the permit conditions? (Condition 8.9.)

Y

RED AISLE SPACE

Is the Permittee maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control and decontamination equipment in the event of an emergency to any area of the facility as required by OAC Rule 3745-54-35? (Condition 8.10.)

Y

REMARKS



CONTINGENCY PLAN - EMERGENCY PROCEDURES

REQUIREMENTS

Y/N/NA

RMK#

compliance with Condition 8.11 of the permit, within six (6) months prior to operation did the Permittee make a diligent effort to:

a) Familiarize the emergency response agencies listed on pages 3-1 through 3-18 of the contingency plan and approved updated plan with:

- i. The layout of the facility?
- ii. Properties of hazardous waste managed at the facility and associated hazards?
- iii. Places where facility personnel will normally be working?
- iv. Entrances to roads inside the facility?
- v. Possible evacuation routes?

NA

b) Inform all local authorities, agencies and response contractors listed in the contingency plan and the approved updated plan of safety equipment, supplies, proper emergency procedures that are applicable to the facility and any further requirements imposed by the permit? and;

c) Familiarize the local hospital with the properties of hazardous waste managed at the facility and the types of injuries or illness which could result from fires, explosions or a release of hazardous wastes at the facility?

d) Obtain an agreement from the authorities listed in the contingency plan and the approved updated plan, designating primary emergency authority and support to the primary emergency authority?

Y

#1

REMARKS

#1 Updated agreement w/ELFD 5/9/02



EMERGENCY/EMERGENCY RESPONSE

Y/N/NA

REMARKS

Has a state or local agency declined to enter into the arrangements set forth in OAC Rule 3745-54-37(A)? If so,

(a) Has the Permittee documented the refusal in the operating record as required by OAC Rule 3745-54-37(B)?
(Condition B.11.(b))

Has the Permittee, in accordance with OAC Rule 3745-54-53 submitted a copy of the approved contingency plan (including amendments, revisions or changes) to all local authorities, agencies and response contractors designated in the approved contingency plan? (Condition B.11.(c))

Has the Permittee notified the agencies in Question #1, in writing, within (10) days of the effective date of any amendments or revisions to the plan? (Condition B.11.(c))

Is the Permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with OAC Rule 3745-54-54? (Condition B.14.)

EMERGENCY COORDINATOR

In accordance with OAC Rule 3745-54-55 and Condition B.15. of the permit, is an emergency coordinator on premises or on call at all times?

In accordance with OAC Rule 3745-54-55 and Condition B.15. of the permit, is/are the emergency coordinator(s) familiar with:

- (a) Contingency plan?
(b) Facility operations/activities?
(c) Waste characterization and locations?
(d) Facility layout?

REMARKS



AGENCY/EMERGENCY RESPONSE

Y/N/NA

FORM#

In accordance with OAC Rule 3745-54-55, does/do the emergency coordinator(s) have the authority to commit the resources needed to carry out the contingency plan? (Condition B.15.)

Y _____

IMPLEMENTATION OF THE CONTINGENCY PLAN

Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents which threaten or could threaten human health or the environment at the facility since date of last inspection? If so,

Y #1

a) Did the Permittee immediately implement the approved contingency plan and follow the emergency procedures described in OAC Rule 3745-54-56? (Condition B.12) and;

Y _____

b) Within (15) days of the incident, did the Permittee submit to the Director, a written report of the incident? If so,

Y _____

1. Did the report contain the elements set forth in OAC Rule 3745-54-56(J)? (Condition B.17)

X _____

c) Did the Permittee note in the operating record the time, date and details of any incident that required implementation of the approved contingency plan? (Condition B.17)

Y _____

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? (Condition F.3.)

Y _____

REMARKS

#1 April 7, 2002 fire in pit #2 Contingency plan rept 4/18

May 23, 2002 Reaction of Mg in slag quench tank " " 6/6

March 25, 2002 fire in feed hopper & crane bucket " " 4/8

February 16, 2002 fire in drum pre-chamber " " 3/1



Nichelle

CLOSURE REQUIREMENTS

	Y/N/NA	RMK#
Is the Permittee maintaining at the facility, the approved closure plan as required by Condition A.13.?	<u>Y</u>	_____
Is the Permittee keeping at the facility, the latest closure cost estimate as required by OAC Rule 3745-55-42? (Condition B.29.)	<u>Y</u>	_____
Has the Permittee amended the closure plan?	<u>Y</u>	_____
(a) If so, has the plan been amended in accordance with OAC Rule 3745-55-12? (Condition B.23.)	<u>Y</u>	_____
	<i>Spring 2001</i>	
	<i>Spring 2002</i>	
Has the Permittee closed the facility? If so,	<u>N</u>	_____
(a) Did the Permittee notify the Ohio EPA at least one hundred eighty (180) days before the date the Permittee expected to begin closure? (Condition B.24.)		_____
(b) Was closure conducted in accordance with the closure performance standard of OAC Rule 3745-55-11, the closure plan (pgs. 14-1 through 14-11 of the application) and the approved updated closure plan? (Conditions B.21.)		_____
(c) Did the Permittee carry out the closure plan as set forth in pages 14-1 through of the permit application and the updated closure plan? (Condition B.22.)		_____
(d) Has the Permittee decontaminated and/or disposed of all facility equipment as required by OAC Rule 3745-55-14 and the approved closure plan? (Condition B.27.)		_____
(e) Has the Permittee treated or removed from the facility all hazardous waste within ninety (90) days of initiation of closure? (Condition B.25.)		_____
(f) Did the Permittee complete closure within one hundred eighty (180) days of the initiation of closure? (Condition B.26.)		_____
(g) 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.28.)		_____



FINANCIAL ASSURANCE REQUIREMENTS

An evaluation of compliance with the following permit conditions applicable to financial assurance and closure cost update is not encompassed in this inspection and is to be evaluated by the Ohio EPA Central Office financial assurance personnel at a later date.

	Y/N/NA	RMK#
Is the Permittee demonstrating compliance with OAC Rules 3745-55-43 and 3745-55-46 by providing documentation of financial assurance in at least the amount required by Condition B.29. of the permit? (Condition B.30.)	Y	---
Is the Permittee demonstrating compliance with the financial assurance requirements of OAC Rule 3745-55-47 and the documentation requirements of OAC Rule 3745-55-51? (Condition B.31.)	Y	---
Is the Permittee in compliance with OAC Rule 3745-55-48? (Condition B.32.)	Y	---

ESTIMATE REQUIREMENTS

Has the Permittee adjusted the closure cost estimate for inflation within (30) days after each anniversary of the date on which the first closure cost estimate was prepared as required by OAC Rule 3745-55-42(B)? [Condition B.29.]	Y	---
Has the Permittee revised the closure cost estimate due to a change in the facility's closure plan as required by OAC Rule 3745-55-42(C)? [Condition B.29.]	Y	---

REMARKS



INCINERATOR PERFORMANCE STANDARDS

Neil

Condition C.3 of the permit designates carbon tetrachloride, trichloroethylene, paradichlorobenzene and naphthalene as the principal organic hazardous constituents (POHCs) for incinerators number 1 and 2 at the facility.

UAL OPERATING REQUIREMENTS

Y/N/NA

REMARKS

Is the Permittee maintaining a destruction removal efficiency (DRE) of 99.99% for each POHC tested? [Condition C.4. (a)]

Y

Is the Permittee calculation the DRE for each POHC using the formula set forth in OAC rule 3745-57-43(A)? [Condition C.4. (a)]

Y

Is the Permittee reducing hydrogen chloride (HCl) emissions to the atmosphere to: [Condition C.4. (b)]

(a) Less than 1.0% of the HCl in the flue gas as it exits from the secondary combustion chamber? *NOT USING THIS OPTION*

✓

OR;

(b) 1.8 kilograms of HCl per hour (four (4) pounds of HCl/hr)?

Y

ICULATE EMISSION STANDARDS

Is the Permittee maintaining particulate emissions from the incineration systems at or below 0.05 grains per dry standard cubic foot corrected to 12% CO₂? [Condition C.4. (c)]

Y

Annual Perf. Test Parameter. NO CEM for Particulate. Use opacity readings from continuous opacity monitor as a surrogate for particulate.
Is the Permittee measuring particulate emissions from the incinerator systems at the facility using Test Method (1) to (5) in "Appendix A" of 40 CFR, Part 60, "Standard of Performance for New Sources," with any modification required by specific sampling needs or Conditions as determined by the Director? [Condition C.4. (c) (i)]

Y

REMARKS

Performance Test done in Nov. 2001.



State of Ohio Environmental Protection Agency
Northeast District Office

2110 E. Aurora Rd.
Twinsburg, Ohio 44067

TELE: (330) 983-1200 FAX: (330) 407-0769
www.epa.state.oh.us

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

Eliv Field office

FAX COVER SHEET

To: Frank Popotnik Fax: _____
 Organization: DEPA - Nedo Phone: _____
 From: Michelle / Patricia Phone: _____
 Date: _____ Pages: _____

Subject: _____
 Urgent Reply ASAP Please Comment For Your Records

Comments:



MISSION STANDARDS

Y/N/NA

RMKS

Does the Permittee maintaining lead emissions from the incinerator systems at or below 0.003 grains of lead as dry cubic foot corrected to 12% CO₂? (Condition C.4.(d))

"REAL TIME MONITOR"

~~X~~

Does the Permittee determine the lead emissions by measuring the lead in accordance with test methods (1) to (5) in Appendix of 40 CFR Part 60, "Standards of Performance for New Stationary Sources" with any modifications required by specific sampling needs and the addition of acid analysis as approved by the Director? (Condition C.4.(d)(i))

During a performance Test.

✓

Method 29

Does the Permittee calculate the lead emission limit using the rolling weighted thirty-day average lead emission rate? (Condition C.4.(d)(ii))

OLD?

✓

INORGANIC/ORGANIC WASTES

Does the Permittee ensure that all phenolic wastes received or treatment at the facility are treated by incineration? (Condition F.4)

~~X~~

Does the Permittee ensure that all organic waste other than phenolic wastes received at the facility for treatment are incinerated unless other treatment methods are provided or specified in section 2 of the permit application? (Condition F.5.)

ONLY INCINERATE

~~X~~

HEAVY METAL EMISSION STANDARDS

Does the Permittee maintain emissions of less than or equal to ten (10) grams of beryllium over a 24-hour period and 0.004 tons of beryllium per year? (Condition C.4.(e))

"REAL TIME MONITOR"

~~X~~

Does the Permittee measure beryllium emissions in accordance with test Method 103 in Appendix B of 40 CFR Part 61, "National Emission Standards for Hazardous Air Pollutants", with any modifications required by specific sampling needs or conditions as determined by the Director? (Condition C.4.(e)(i))

✓

Method 29 in Perf. Test

REMARKS



DRY EMISSION STANDARDS

Y/S/NA

REMARKS

Does the Permittee maintain emissions of less than or equal to 1200 grams of mercury per 24-hour period and 1.20 tons per year of mercury? (Condition C.4.(5))

"REAL TIME MONITOR"

~~Y~~

Does the Permittee measure the mercury emissions in accordance with Test Method 101 in appendix B of 40 CFR Part 61, "National Emission Standards for Hazardous Air Pollutants" with any modifications required by specific sampling needs or conditions as determined the Director? (Condition C.4.(5)(i))

Method 29 in Perf Test

✓

CHROMIUM EMISSION STANDARDS

Does the Permittee calculate the annual emissions of chromium resulting from operation of the incineration systems? (Condition C.4.(g)) - *"REAL TIME MONITOR"*

✓

Has the Permittee developed a correlation chart, based upon the trial burn results which correlates the relationship between chromium content of the waste feed and the resulting chromium emissions from the incinerator to the atmosphere?

Probably never done

✓

(Condition C.4.(g)(i))

CO MONOXIDE EMISSION STANDARDS

Does the Permittee maintain carbon monoxide concentrations in the flue gas of less than or equal to 100 ppm by volume on a dry basis? (Condition C.23.(a)) *WFCO*

ROLLING ONE HOUR AVERAGE

~~Y~~

Does the Permittee continuously monitor and record the carbon monoxide concentration in the flue gas? (Condition C.23.(a))

LIEM FOR CO

~~Y~~

REMARKS



FEED/AUXILIARY FUEL REQUIREMENTS

Y/N/NA

RMK#

Does the Permittee operate the incinerator system to ensure that the waste feed rate and auxiliary fuel feed rate to the incinerator remains within the range of 49 million to 97.8 million BTU/hr heat input, calculated using a three (3) hour operating average? (Condition C.23.(b)(i)) **CALCULATED AS FEEDS ENTER INCINERATOR; HORIZAL SYSTEM WITH ON DCS** **Y**

Does the Permittee monitor and record the feed rate of pumpable materials and gaseous materials including waste feed and auxiliary fuel on a continuous basis? (Conditions C.23.(b)(ii)(iii)) **Y**

Does the Permittee monitor and log the feed rate of nonpumpable material to the incinerator once per charging cycle or once every fifteen (15) minutes whichever period is greater? (Condition C.23.(b)(iv)) **DCS TRACKS WEIGHTS** **Y**

Does the Permittee inject any material other than gaseous or aqueous liquid materials into the secondary combustion chamber? (Condition C.23.(b)(v)) **NO WASTES TO SCC. O2 INJECTION UNDER CONSTRUCTION.** **Y**

✓
NO GAS
STEAM
RUBBER
AW.

Does the Permittee limit the solid waste feed to each rotary kiln to 10,500 pounds per hour (24 hour operating average)? (Condition C.23.(b)(vi)) **15,265 #/HR TRACKED ON DCS** **Y**

LINE/LISTED CHEMICAL CONSTITUENT REQUIREMENTS

Does the Permittee limit the total chlorine content (as determined using the waste analysis plan) of materials fed into the incinerator (rotary kiln and secondary combustion chamber) to 2700 pounds per hour (3 operating hour average)? (Condition C.23.(b)(vii)) **REAL TIME MONITOR** **Y**

Does the Permittee ensure that chemical constituents listed in 40 CFR Part 261 Appendix VIII (as determined by the waste analysis plan) are not introduced into the waste feed that have a heat of combustion value that is lower than carbon tetrachloride? (Condition C.23.(b)(viii)) **Y**

THESE ARE LISTED ON CHECKLIST
USED TO APPROVE PROFILES.
REMARKS



SCC Temperature

1800 °F winter/low Min
KILN ORTLET (4300 TC)

1830 °F Four Horn Rolling Pvc
2200 °F Insulation Maximum

TEMPERATURE/FLOW RATE REQUIREMENTS

Based upon the trial burn results, does the Permittee maintain the temperature of the combustion gases in the secondary combustion chamber just prior to the secondary air injection of at least ~~2032 °C (1295 °C)~~ [Condition C.23.(c)]

charge approx 5-97.
The temperature limit will be decided by the trial burn results***

X ✓

Does the Permittee continuously monitor and record the temperature of the combustion gas in the secondary combustion chamber just prior to the secondary air injection? [Condition C.23.(c)]

X

Does the Permittee ensure that the total volumetric flow rate through the incinerator system, as measured at the induction fan or other flow monitoring equipment does not exceed 65,000 scfm at 70° F? [Condition C.23.(d)] WFCO

X

Does the Permittee continuously monitor and record the total volumetric flow rate at the induction fan or other flow monitoring equipment? [Condition C.23.(d)]

X

CONCENTRATION REQUIREMENTS

Does the Permittee ensure that the O₂ concentration in the flue gas leaving the electrostatic precipitator is greater than three (3) percent by dry volume basis? [Condition C.23.(e)]

CEM

X

Does the Permittee continuously monitor and record the O₂ concentration in the flue gas leaving the electrostatic precipitator? [Condition C.23.(e)]

X

SECONDARY COMBUSTION CHAMBER PRESSURE

Does the Permittee ensure that the pressure in the secondary combustion chamber is less than atmospheric pressure at all times? [Condition C.23.(f)] OCCASIONAL PRESS

SPIKES, MORE SPITTING OF CHARGES.

X ✓

Does the Permittee continuously monitor and record the pressure in the secondary combustion chamber? [Condition C.23.(f)]

WFCO

X

PH REQUIREMENTS

Does the Permittee ensure that the pH of the scrubbant at the top of the packed bed scrubber is 7.0 S.U. or above? [Condition C.23.(g)] WFCO OCCASIONAL DROP

BELOW 7.0

X

Does the Permittee continuously monitor and record the pH of the scrubbants to the scrubber system? [Condition C.23.(g)]

X



CARBON CONCENTRATION REQUIREMENTS

Y/N/NA

RMK#

Does the Permittee maintain the total hydrocarbon concentration (as methane) in the flue gas leaving the wet scrubber at or less than 100 ppm by dry volume basis? (Condition C.23.(h))

OCCASIONAL SPIKE

Y

✓

Does the Permittee continuously monitor and record the total concentration of hydrocarbon concentration in the flue gas leaving the wet scrubber? (Condition C.23.(h))

X

GAS TEMPERATURE/ESP REQUIREMENTS

Does the Permittee ensure that the inlet gas temperature for the electrostatic precipitators does not exceed 232° C (450° F)? (Condition C.23.(i))

WFCO

X

Does the Permittee continuously monitor and record the temperature of the inlet gas for the electrostatic precipitators? (Condition C.23.(i))

X

Does the Permittee ensure that all three (3) fields of the electrostatic precipitators are energized when hazardous waste is being burned in the incinerator, except during periods of regularly scheduled maintenance when two fields may be used for periods not to exceed 48 consecutive hours? (Condition C.23.(i))

X

SCRUBBANT SYSTEM REQUIREMENTS

Does the Permittee ensure that the scrubbant treatment system is maintained closed to the atmosphere and is vented to the incineration system or to the vent gas cleaning system to control fugitive emissions? (Condition C.23.(j))

X

If the operating requirements of C.23. are changed as a result of the trial burn to reflect the results of the trial burn, the checklist shall be changed accordingly.***

B: The Conditions of C.23. may be changed for conducting the trial burn.

Has the Permittee made changes to the incinerator, its flue gas cleaning system, or the operating procedures as detailed in the application that would affect the achievement of the performance standards contained in Condition C.4., or any other permit condition? (Condition C.23.(l))

02 TO SCC.

N

If the answer to 42 above is yes, did the Permittee submit a request to and receive an approval from the Ohio EPA before making the changes? (Condition C.23.(l))

NONE IN PAST 6 MONTHS

N/A



FEED CUT-OFF REQUIREMENTS

Y/N/NA

REMARKS

Does the Permittee ensure that all waste feed is cut off automatically when:

- (a) The limits specified in Condition C.23.(a), (c) or (e) are exceeded? [Condition C.23.(m)(i)] *AUTO TEST PROGRAM* Y
- SIAMKATIS WFOO WERRAY 9 EST check one or two*
- (b) There is a loss of negative pressure in the secondary *parameters specified* combustion chamber for a period of two (2) seconds or longer? [Condition C.23.(m)(ii)] Y
- (c) The hydrocarbon level or CO level in the flue gas indicates the destruction and removal efficiency [Condition C.4.(a)] is not being met? [Condition C.23.(m)(iii)] Y

Does the Permittee ensure that all hazardous waste feed is cut off when:

- (a) The limits specified in C.23.(b), (d), (g), (h) and (i) are exceeded? [Condition C.23.(n)(i)] Y
- OR;
- (b) Any of the monitoring equipment required in Condition C.23.(a) through (i) is not operating properly? [Condition C.23.(n)(ii)] *WFOO PARAMETERS HAVE DUAL SENSORS* Y

PLUME SUPPRESSION SYSTEM REQUIREMENTS

Does the Permittee ensure that, when hazardous waste is being burned in the incinerators, the plume suppression system, as described in section 17 of the revised permit application, is operated continuously, except during regularly scheduled maintenance or repair (not to exceed 24 hours)?

[Condition C.23.(o)] *SODIUM THIOSULPHATE IS FED AUTOMATICALLY BASED ON SIGNAL FROM OPACITY MONITOR* Y

If the Permittee has operated the incinerator during a period of greater than 24 hours of plume suppression system shutdown did the Permittee receive written authorization from the Ohio EPA? [Condition C.23.(o)] N/A

If the Permittee shut down the plume suppression system while burning hazardous waste more than ten (10) times during a calendar year did the Permittee request and receive written authorization from the Ohio EPA? [Condition C.23.(o)] N/A

REMARKS



INCINERATOR OPERATING PROCEDURES

Y/N/NA

RMK#

During start-up and shut-down does the Permittee ensure that the hazardous waste is not fed into the incinerator unless the incinerator is operating within the conditions of operations specified in the Permit? (Condition C.16., OAC Rule 3745-57-45(C))

WFCU prevents feeding until parameters are met

X

Does the Permittee ensure that fugitive emissions from the combustion zone are controlled by maintaining a pressure that is lower than atmospheric pressure (negative pressure)? (Condition C.17., OAC Rule 3745-57-45(D))

WFCU OCCASIONAL SPIKES

X

Does the Permittee cease operating the incinerator when changes in the waste feed, incinerator design, or operating conditions exceed limits designated in the permit? (Condition C.18., OAC Rule 3745-57-45(F))

X

Does the Permittee test each incinerator on an annual basis, or more frequently as directed by the Ohio EPA, to verify that the operating requirements established in the permit result in compliance with the performance standards contained in Condition C.4 or to determine whether amendment of the performance standard contained in Condition C.4, or additions to the operating requirements are necessary? (Condition C.19.)

NOV. ANNUAL PERF TEST

X

INSPECTIONS

Does the Permittee inspect the incinerator and associated equipment in accordance with the inspection plan (permit application pgs. 7-1 through 7-17) and OAC Rule 3745-57-47? (Condition C.20.)

X

Does the Permittee ensure that the inspection data is recorded in the operating record in accordance with OAC Rule 3745-57-47(D)? (Condition C.21.)

X

CLOSURE

At the time of closure did the Permittee ensure that each incinerator was closed in accordance with OAC Rule 3745-57-51, the closure plan (permit application pages 14-1 through 14-11) and the approved updated closure plan? (Condition C.22.)

N/A

REMARKS



SHUTDOWN PERIOD - PERFORMANCE STANDARDS

shakedown period is the period of time from the first time hazardous waste is fed the incinerator until the beginning of the trial burn.

Y/N/NA

RMK#

During the shakedown period, did the Permittee construct calibration charts of the induced fan (or other flow monitoring equipment), which relate pressure drop, temperature, and fan amperage or other flow monitoring equipment parameters to combustion gas velocity or volumetric flow rate? [Condition C.9(a)]

N/A

During the shakedown period, did the Permittee develop a correlation between the Destruction Response Efficiency performance standard (Condition C.4(a)) and the hydrocarbon level and/or carbon monoxide level in the flue gas? [Condition C.9(b)]

During the shakedown period, did the Permittee operate either incinerator number 1 or incinerator number 2 for greater than seven hundred twenty hours when burning hazardous waste? [Condition C.11. (a)]

(a) If so, has the permit been modified to increase the period of time allowed for incinerator operation during the shakedown period in accordance with OAC Rule 3745-50-62(A)? [Condition C.11. (a)]

During the shakedown period, does the Permittee burn only aqueous liquids and/or ignitable gaseous materials in the secondary combustion chamber? [Condition C.11. (b)]

During the shakedown period, does the Permittee ensure, based upon the waste analysis, that:

(a) The waste feed contains only small amounts of waste constituents listed in OAC Rule 3745-51-33(E)? [Condition C.11. (c) (i)]

AND:

(b) The waste feed has a chlorine content of less than 10% by weight? [Condition C.11. (c) (ii)]

During the shakedown period, does the Permittee ensure that the temperature of the flue gas in the secondary combustion chamber just prior to secondary air injection is maintained at a minimum of 1100° C (2021° F)? [Condition C.11. (d)]

Vertical line with horizontal tick marks and a downward-pointing arrow at the bottom, indicating a continuation of the table.



DOWN PERIOD - PERFORMANCE STANDARDS (Continued)

Y/N/NA

REMARKS

During the shutdown period, does the Permittee continuously monitor and record the temperature of the flue gas in the secondary combustion chamber just prior to secondary air injection? [Condition C.11.(d)]

N/A

During the shutdown period, does the Permittee ensure that the total feed rate, including waste feed and auxiliary fuel does not exceed 97.8 million BTU/hour for each incinerator? [Condition C.11.(e)]

During the shutdown period, does the Permittee ensure that the hazardous waste feed is cut off when:

(a) The operating limits set forth in Conditions C.11(d) and C.23 (a) and (e) are exceeded? [Condition C.14.(a)(i)]

OR;

(b) There is a loss of negative pressure in the secondary combustion chamber for a period of two (2) seconds or longer? [Condition C.14.(a)(ii)]

During the shutdown period does the Permittee ensure that the hazardous waste feed is cut off whenever:

(a) The limits specified in Conditions C.11(a), (b), (c), (e), C.23(d), (g), (h) and (i) are exceeded? [Condition C.14.(b)(i)]

OR;

(b) Any of the monitoring equipment required in Conditions C.11.(d), C.23.(a), (b), (d), (e), (f), (g), (h) and (i) is not operating? [Condition C.14.(b)(ii)]



REMARKS





AL BURN (continued)

Y/N/NA

RMK#

(g) A computation of particulate emissions in accordance with OAC Rule 3745-57-43?

(h) A measurement of average, maximum and minimum temperature and combustion gas velocity? (OAC Rule 3745-50-62(B)(6))

(i) A continuous measurement of carbon monoxide in the exhaust gas? (OAC Rule 3745-50-62(B)(6))

Did the Permittee submit a copy of all data, including the calibration charts described in Condition C.9., collected during the trial burn, to the Ohio EPA, following the completion of the trial burn? (Condition C.8., OAC Rule 3745-50-62(B)(9))

Did the Permittee operate and monitor incinerator number 1 in accordance with the trial burn plan, the permit conditions, and all applicable Ohio hazardous waste rules? (Condition C.12.)

REMARKS



POST TRIAL BURN

The post trial burn period is the period of time between the completion of the trial burn and the date of the approval of the trial burn results by the Ohio EPA.

WTI - began normal operations of the final work assessment & apparently trial burn 5-97 Y/N/NA RMR#

Does the Permittee only operate incinerator number 1, except when the Ohio EPA authorizes the use of incinerator number 2? [Condition C.13.(a) & (h)]

N/A

Does the Permittee ensure, based upon waste analysis, that the waste feed contains only small amounts of hazardous waste defined in OAC Rule 3745-51-33(E)? [Condition C.13.(b)]

During the trial burn was the carbon monoxide limit of 100 ppm by dry volume exceeded?

(a) If yes, did the Permittee receive written approval of operation of the incinerator by Ohio EPA? [Condition C.13.(c)]

(b) If yes, is the Permittee operating the incinerator in compliance with operating conditions specified in writing by the Ohio EPA? [Condition C.13.(c)]

Did the Permittee or the Ohio EPA determine, based on the analytical results of the completed trial burn, that the incinerator failed to achieve any of the performance standards specified in condition C.4. of the permit? [Condition C.13.(d)]

(a) If yes, did the Permittee report the circumstance to Ohio EPA, within twenty four (24) hours? [Condition C.13.(d)]

AND:

(b) Did the Permittee cease feeding hazardous waste to the incinerator? [Condition C.13.(d)]

Did the Permittee submit the certification and information described in Condition C.7. within ninety (90) days or other approved period?

(a) If no, has the Permittee ceased operation of the incinerator? [Condition C.13.(e)]

While burning hazardous waste, does the Permittee maintain the flue gas temperature in the secondary combustion chamber just prior to secondary air injection at a minimum of 1100° C (2011° F)? [Condition C.13.(f)]

Vertical line with horizontal tick marks and a checkmark at the bottom.





John

STORAGE IN CONTAINERS

Y/N/NA REMKS

Does the Permittee maintain a maximum inventory of no more than 610,000 gallons (11,090 55-gallon drums)? [Condition E.1.]

Y

Are all containers holding hazardous waste in good condition? [Condition E.2.]

Y

(a) If not, (e.g., severe rusting, apparent structural defects or leakage) did the Permittee transfer the hazardous waste from such container to one that was in good condition or manage the waste in some other manner that complies with the requirements of the Ohio hazardous waste rules? [Condition E.2.]

Y

Is the Permittee using containers made of or lined with materials which will not react with the hazardous waste to be stored? [Condition E.3.]

Y

Are containers holding hazardous waste always kept closed during storage, except when it is necessary to add or remove waste? [Condition E.4.]

Y

Are containers holding hazardous waste being opened, handled and stored in a manner which prevents rupture or leakage of the container? [Condition E.4.]

Y

RECTIONS

At least weekly, is the Permittee inspecting areas where containers are stored, looking for leaking containers and for deterioration of containers and the containment system caused by corrosion or other factors, in accordance with the inspection plan (pages 7-1 through 7-17 of the permit application) and the approved updated inspection plan? [Condition E.5.]

Y

Does the Permittee ensure that all containers and inner liner 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? [Condition E.6.]

Y/BS

*

REMARKS



CONTAINMENT SYSTEM

Y/N/NA

RISKS

1. Did the Permittee ensure that the container storage area has a containment system that is designed and operated in accordance with the following requirements of OAC Rule 3745-55-75 (A) and Condition E.7. of the permit:

(a) Is the base is free of cracks and gaps?

(b) Is the base capable of containing leaks, spills and accumulated rainfall until such time that the material is detected and removed?

(c) Was the containment system designed for efficient drainage and sufficient capacity to contain 10% of the maximum volume of containers?

(d) Did the Permittee construct the containment system in accordance with the application and the Ohio hazardous waste rules?

(e) Did the Permittee provide the containment system with an adequate roof and walls to prevent run-on into the containment system?

(f) Does the Permittee remove spilled or leaked waste and accumulated precipitation from the sump or collection area to prevent overflow of the collection system?

(g) Does the Permittee manage any material removed from the collection system that is a hazardous waste as a hazardous waste?

Handwritten 'Y' marks in the Y/N/NA column for items (a) through (g). The RISKS column contains horizontal lines.

REQUIREMENTS FOR IGNITABLE/INCOMPATIBLE/REACTIVE WASTES

Does the Permittee ensure that containers holding ignitable or reactive waste are located at least 15 meters (50 feet) from the facility's property line? [Condition E.8.]

Does the Permittee ensure that incompatible wastes are not placed in the same container? [Condition E.9. (a)]

Does the Permittee ensure that hazardous wastes are not placed in an unwashed container that previously held an incompatible waste or material? [Condition E.9. (b)]

Handwritten 'Yes' marks in the Y/N/NA column for the three questions. The RISKS column contains horizontal lines.



Y/N/NA

FOUR

2. Does the Permittee ensure that containers holding wastes are not stored near any wastes or materials that are incompatible with the waste? (Condition E.9.(c))

Yes

3. Does the Permittee ensure that the aisle space in the container storage building is adequate for the movement of personnel, fire protection equipment, spill control equipment and decontamination equipment and that the aisle space is no less than five (5) feet? (Condition E.10.)

Yes

4. If the Permittee closed the container storage area, did the Permittee comply with OAC Rule 3745-55-78, the closure plan (pages 14-1 through 14-11) and the approved revised closure plan? (Condition E.11)

Yes

REMARKS



John

TANK STORAGE SYSTEM

Y/N/NA

RMR#

Does the Permittee limit the storage of hazardous waste in tanks to the following, as required by Condition D.1 of the permit?

ITEMS	WASTE DESCRIPTION	TOTAL CAPACITY	
34 tanks above-ground	pumpable liquids	2,962,100 gallons	
tanks underground	nonreactive loose solid	2,4000 cubic yards	Yes
tanks above-ground	solid treatment residues	180 cubic yards	

TANK CONSTRUCTION

Did the Permittee ensure that all tanks were designed and constructed in accordance with the appropriate American Society of Mechanical Engineers (ASME) "Boiler and Pressure Vessel Code," Section VIII, Division 1, (1974); American Petroleum Institute (API), Standard 650, "Welded Steel Tanks for Oil Storage," (November 1980); or National Bureau of Standards (NBS) "Voluntary Product Standard," PS 15-69 (June 1970)? [Condition D.2.]

Yes

Did the Permittee ensure that all combustible liquid storage tanks were designed to NFPA 30 (1981) "Flammable and Combustible Liquid Code"? [Condition D.2.]

Yes

Did the Permittee ensure that the minimum shell thickness of all combustible liquid storage tanks are of a minimum design and constructed thickness:

(a) To satisfy hydrostatic loading?

5/16 wall / 3/8 heads

Yes ultra sound.

(b) The corrosion allowance or tank wall thickness in addition to the minimum design thickness as specified in the permit application (pages 16-24 and 16-25)? [Condition D.2.]

1/8 thickness

Does the Permittee repair or remove from service all tanks that have diminished to the minimum design shell thickness? [Condition D.2.]

Have do in Two Tanks. Yes



Y/N/KA

RMRA

6. Did the Permittee construct all tank foundations and structural supports in accordance with API-Appendix B "Recommended Practice for the Construction of Foundation for API Vertical Cylindrical Storage Tanks," p. B-1; and ASME-Appendix G "Suggested Good Practices Regarding Design of Supports," p.345, as appropriate? [Condition D.3.]

Yes

7. Did the Permittee ensure that all tanks were welded according to the procedures in API- Section 7 "Welding Procedures and Welder Qualification," p.7-1; and ASME-Part UW "Requirements for Pressure Vessels Fabricated by Welding," p.71? [Condition D.4.]

Yes

8. Has the Permittee ensured that the new tank systems and components were installed in accordance with the requirements of OAC Rule 3745-55-92? [Condition F.14., OAC Rule 3745-55-92]

Yes

9. Does the Permittee have on file at the facility, written statements by those persons required to certify the design of the tanks system and supervise the installation of the tank systems in accordance with the requirements of OAC Rule 3745-55-92(G)? [Condition F.14., OAC Rule 3745-55-92]

Yes

10. Do all tank secondary containment installations meet the standards set forth in OAC Rule 3745-55-93? (Condition F.14, OAC Rule 3745-55-93)

Yes

11. 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? [Condition D.5., OAC Rule 3745-55-94]

Yes

GENERAL OPERATING REQUIREMENTS

12. Does the Permittee follow the schedule and procedures for inspecting tank systems at the facility as set forth in the permit application (pages 7-1 through 7-17), the updated general inspection schedule and OAC Rule 3745-55-95(a)? [Condition F.14., OAC Rule 3745-55-95]

Inspection Plan is followed

Yes

13. Does the Permittee daily inspect the following in accordance with Condition F.14. and OAC Rule 3745-55-95:

(a) The above ground portions of the tank systems to detect corrosion or release of waste?

Yes

(b) Data gathered from monitoring and leak detection equipment to ensure that tank systems are being operated according to their designs?

Yes

They have plan quarterly for 3 years then annual if no leaks are detected.



Y/N/NA

RMK#

(c) The construction material and area immediately surrounding the externally accessible portion of the tank system including the secondary containment system?

Yes

14. Does the Permittee inspect the cathodic protection systems (if any) according to OAC Rule 3745-55-95(C)? [Condition F.14.]

No

15. Has a leak or spill occurred in the tank system? If so,

Yes

(a) Did the Permittee comply with the requirements of OAC Rule 3745-55-96 and the contingency plan? [Condition F.14.]

They are cleaned out 5000 gal. noticed.

Yes

WASTE COMPATIBILITY

- Compatibility test is done before its placed in the tank.

6. Does the Permittee ensure that incompatible wastes are not placed in the same pipe or tank? (Condition D.9.)

Yes

7. 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 rule 3745-54-17? (Condition D.9.)

All items are purged with N₂

Yes

SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTES

8. Does the Permittee ensure that ignitable or reactive wastes are placed only in tanks that: (Condition D.8.)

(a) Maintain a nitrogen blanket over volatile organic wastes sufficient to prevent air intrusion and maintain internal tank atmosphere under the lower explosive limit?

Yes

(b) Are equipped with a vent emission control system which collects vapors and conveys them to be thermally destroyed by incineration or to be treated by the vent gas treating system?

Yes

(c) Are equipped with flame arrestors or equivalent devices located in the vent gas conveying system?

Yes

(d) Are installed in compliance with the buffer zone requirements contained in Tables 2-1 through 2-8 of the National Fire Protection Association's "Flammable and Combustible Liquid Code" (1977 or 1981)?

Yes

REMARKS



Neil

TRANSPORTATION OF WASTES TO THE FACILITY

Y/N/NA

RMK#

- 1. Does the Permittee advise all transporters in transit to the facility with hazardous waste shipments of current weather, road and traffic Conditions on a continuing basis? [Condition F.9.(a)] *Transport Agreement given prior to Transport certain a contact number for transporters* Y ---
- 2. Does the Permittee use its best efforts to arrange with the appropriate local law enforcement agencies and the State Highway Patrol for the timely access to weather, road and traffic information and other pertinent information? [Condition F.9.(b)] *to call to get that info.* X ---
- 3. Does the Permittee use its best effort to encourage transporters to use routes designated by the Permittee which will minimize the risk of transportation related incidents? [Condition F.9.(c)] *Transport Agreement contains routing* X ---
- 4. Does the Permittee use its best effort to encourage transporters to schedule arrival at the Facility during periods when roads in the East Liverpool area are not in peak traffic use? [Condition F.9.(d)] X ---

REMARKS



N/A

CRITICAL LOW FLOW AND MAXIMUM RAINFALL

Y/N/NA

RMK#

- 1. In the event that critical low-flow conditions in the Ohio River coincided with a twenty-five year rainfall event, did the Permittee cease discharge to the East Liverpool POTW and contain waste water until such time as the rainfall event had passed? [Condition F.10.]

N/A

SOLID OR SEMI-SOLID WASTE GENERATED BY THE PERMITTEE

- 1. Does the Permittee ensure disposal of solid or semi-solid wastes that it generates at a facility that is authorized to dispose of such wastes? [Condition F.11.]
- 2. Does the Permittee manage the solid and semi-solid wastes generated at the facility as hazardous wastes until they are specifically delisted? [Condition F.11.]

X

X

TREATS WASTES AS HAZ, ~~HAZARDOUS~~

REMARKS



GUNARS

GROUNDWATER MONITORING

NOTE: Evaluation of compliance with the permit conditions applicable to ground water monitoring requirements is not encompassed in this inspection and is to be made by Ohio EPA, Division of Drinking and Ground Waters and Ohio EPA Division of Hazardous Waste Management at a later date.

	Y/N/NA	REMARKS
1. Prior to operation of the facility did the Permittee report to the Ohio EPA the precise location of the two (2) groundwater monitoring wells at the facility? [Condition F.12.(a)]	<u>YES</u>	_____
2. Did the Permittee ensure that the groundwater monitoring wells were located and installed in such locations and distances from the active process areas as are reasonably adequate to protect the groundwater from contamination by runoff from the facility? [Condition F.12.(a)]	<u>YES</u>	_____
3. Did the Permittee ensure that the groundwater monitoring wells were located and installed consistent with the hydrogeologic data necessary for the establishment of a groundwater monitoring program? [Condition F.12.(a)]	<u>YES</u>	_____
4. Did the Permittee submit to the Ohio EPA a groundwater monitoring plan that includes but is not limited to: [Condition F.12 (b)]		
(a) A specification of detection monitoring parameters?	<u>YES</u>	_____
(b) The establishment of background concentration levels for detection monitoring parameters?	<u>YES</u>	_____
(c) The statistical procedures for comparison of the detection monitoring parameter concentrations?	<u>YES</u>	_____
(d) Sampling, analysis and reporting procedures used?	<u>YES</u>	_____
5. Does the Permittee submit all groundwater monitoring results to Ohio EPA according to the schedule specified in the groundwater monitoring plan? [Condition F.12.(b)]	<u>YES</u>	_____

REMARKS



GUNAR S

INSPECTION OF RIVERBANK AND FILL MATERIAL

Y/N/NA

RMK#

Does the Permittee conduct inspections to ensure that the fill material and the underlying soils remain stable and that no lateral movement occurs which may compromise the integrity of the foundation of the facility? [Condition F.13.(a)]

YES

Did the Permittee submit to the Ohio EPA at least sixty (60) days prior to operation of the facility a description of the inspection procedures, schedules, and criteria including the following: [Condition F.13.(b)]

(a) A visual evaluation of the effects of erosion along the bank of the Ohio River adjacent to the facility?

YES

(b) An inspection of the soil integrity in the area of the installed sheet pile wall through visual inspections and standard surveying techniques?

YES

(c) The frequency of inspections? MONTHLY

YES

Visual inspections monthly minimum, surveys every 6 months. [Condition F.13.(b)]

Does the Permittee record the inspections specified in Condition F.13. in the facility inspection log for incorporation into the facility operating record? [Condition F.13.(c)]

YES

If the inspections described in Condition F.13. indicated a condition that compromised the integrity of the foundations of the facility, did the Permittee take corrective action to remediate the condition? [Condition F.13.(d)]

NA

REMARKS

