



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

**Re: Ineos USA LLC
OHD042157644
Allen County
DMWM, NWDO
Notice of Violation/Return to
Compliance/Request for
Information**

July 9, 2012

Ms. Marcelyn Boone
Ineos USA LLC
1900 Fort Amanda Road
Lima, Ohio 45804

Dear Ms. Boone:

I would like to thank you for allowing Joe Bianco and Chad Ulm of your staff to accompany Gary Deutschman and me during the Ohio Environmental Protection Agency's (Ohio EPA's) June 11, 2012, compliance evaluation inspection of the Ineos USA LLC (Ineos) facility in Lima, Ohio. We inspected Ineos to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC) and the facility's Ohio Hazardous Waste Facility Installation and Operation Permit (Permit) issued on December 20, 2002.

Ohio EPA's inspection included an inspection of facility operations and a review of written documentation. The inspection did not include a review of financial assurance, groundwater monitoring, or corrective action requirements. Ineos is subject to these requirements; however, compliance for these issues will be evaluated at a later date.

Ineos operates an industrial chemicals manufacturing complex. The facility produces acrylonitrile, acetonitrile, hydrogen cyanide, acrylonitrile catalyst, and Barex, a polymerized product of acrylonitrile. Ineos generates the following hazardous wastes at their facility on a regular basis: filter cake from the deepwell filter pretreatment (D003, D018, D038, K011, K013, K014, P063, U003, U009), catalyst plant scrubber water (D002), bottom stream from the wastewater stripper (acrylonitrile) (K011), bottom stream from acetonitrile column (acrylonitrile production) (K013), bottom stream from acetonitrile purification (K014), lab packs from the resin production lab (D001, D035, F005), and spent caustic from vessel cleaning (D002). Additional hazardous waste streams are generated on an irregular basis and are listed in the process sheet. Ineos also generates used oil, universal waste lamps, universal waste batteries, and spent parts washer fluid.

We found the following violations of Ohio's hazardous waste laws.

Violations:

1. **OAC Rule 3745-273-13(D)(1), Waste management-standards for small quantity handlers of universal waste:** "A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions."

Ineos failed to store one container of universal waste lamps in a closed container.

During the inspection, Ineos closed the container of lamps.

Therefore, this violation is considered abated on June 11, 2012.

2. **OAC Rule 3745-273-14(E), Labeling/marking-standards for small quantity handlers of universal waste:** "Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)."

Ineos failed to mark 15 containers holding the spent lamps with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)."

During the inspection, Ineos properly labeled the boxes of lamps.

Therefore, this violation is considered abated on June 11, 2012.

Request for Information:

1. **Manifests:** During the inspection, it was noted that Ineos had some weight discrepancies on their hazardous waste manifests. In order to determine Ineos' compliance, Ohio EPA is requesting that Ineos submit copies of all hazardous waste manifests dating between June 2009 and the present date. **Please submit the requested information within 14 days of receipt of this letter.**
2. **Parts Washer Solution:** During the inspection, Ineos stated that they have two parts washers. One is located in the maintenance shop and one is located in the Jacobs Engineering Building. The material safety data sheet for this material shows the flashpoint of this material is 124 degrees Fahrenheit.

Ms. Marcelyn Boone
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During the inspection, Joe Bianco stated that Ineos may have analyzed this waste for flashpoint and Resource Conservation & Recovery Act (RCRA) metals. However, Ohio EPA did not review this documentation while on site. Please submit the waste evaluation information for the spent parts washer fluids to Ohio EPA. Also, please describe how often spent parts washer fluid is generated from each parts washer, how much is generated at any one time, and how this material is managed and disposed. Please also submit disposal documents for this waste stream. **Please submit all requested information to Ohio EPA within 14 days of receipt of this letter.**

Enclosed you will find a copy of the checklists that were completed during the inspection. Should you have any questions, please feel free to call me at (419) 373-3065. You can find copies of the rules and other information on the division's web page at <http://www.epa.ohio.gov/dhwm/>.

Sincerely,



Kara Reynolds
Environmental Specialist
Division of Materials and Waste Management

/lr

Enclosures

pc: ~~Colleen Weaver, DMWM, NWDO~~
Kara Reynolds, DMWM, NWDO
Cindy Lohrbach, DMWM, NWDO
Chuck Lowe, DDAGW, CO

ec: John Pasquarette, DMWM, NWDO
Gary Deutschman, DMWM, NWDO
Colleen Weaver, DMWM, NWDO (with checklists)
Joseph Bianco, Ineos USA LLC (with checklists)
Chad Ulm, Ineos USA LLC (with checklists)

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.

Send to Central Office <input checked="" type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to brad.hauser@epa.state.oh.us.

Site EPA ID No. Site Name	EPA ID Number: OHD042157644		Website: (Optional)
Site Location Information	Name: Ineos USA LLC		
Site Land Type (check only one)	Street Address: 1900 Fort Amanda Road		
NAICS code(s) www.census.gov/epcd/www/naics.html	City, Town, or Village: Lima		State: OH
	County Name: Allen		Zip Code: 45804
	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>
	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>
	State <input type="checkbox"/>	Other <input type="checkbox"/>	
	325199	325211	

Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: Joseph			MI:	Last Name: Bianco	
	Title: SHE Manager			Phone Number: 419-226-1351		
	E-Mail Address: joseph.bianco@ineos.com			Phone Number Extension:		
	Fax Number: 419-226-1685			Fax Number Extension:		
	Street or P.O. Box: P.O. Box 628					
	City, Town or Village: Lima			Zip Code: 45802		
	State: Ohio					

Legal Owner And Operator of the Site. List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Ineos USA LLC		Date Became Owner (mm/dd/yyyy):			
	Owner Type: <input checked="" type="checkbox"/>	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>
	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>			
	Street or P.O. Box: 150 West Warrenville Road					
	City, Town or Village: Naperville			Owner Phone #: 630-420-5200		
	State: Illinois			Country: USA		Zip Code: 60563
	Name of Site's Operator: Ineos USA LLC		Date Became Operator (mm/dd/yyyy):			
	Operator Type: <input checked="" type="checkbox"/>	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>
	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>			
	Street or P.O. Box: P.O. Box 628					
	City, Town or Village: Lima			Operator Phone #: 419-226-1200		
	State: Ohio			Country: USA		Zip Code: 45802

VIOLATIONS CITED?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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TYPE OF HANDLER - MARK "X" AS APPROPRIATE		
<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11	<input checked="" type="checkbox"/> Large Quantity Generator (LQG)
	<input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.	<input type="checkbox"/> Small Quantity Generator (SQG)
		<input type="checkbox"/> Conditionally Exempt Small Quantity Generator
		<input type="checkbox"/> U.S. Importer of Hazardous Waste
		<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

<input type="checkbox"/> Hazardous Waste Transporter	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace
<input type="checkbox"/> Hazardous Waste Transfer Facility	<input type="checkbox"/> Small Quantity On-Site Burner Exemption
<input checked="" type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste	<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> Recycler of Hazardous Waste	<input checked="" type="checkbox"/> Underground Injection Control Facility
<input type="checkbox"/> 72-Hour Recycler	<input type="checkbox"/> Receives Hazardous Waste from Off-site

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED (CHECK ALL BOXES THAT APPLY))

<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste	<input type="checkbox"/> Destination Facility for Universal Waste
<input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

<input checked="" type="checkbox"/> Batteries
<input type="checkbox"/> Pesticides
<input type="checkbox"/> Mercury containing equipment
<input checked="" type="checkbox"/> Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))

<input checked="" type="checkbox"/> Used Oil Generator
<input type="checkbox"/> Used Oil Transporter
<input type="checkbox"/> Used Oil Transfer Facility
<input type="checkbox"/> Used Oil Processor
<input type="checkbox"/> Used Oil Re-refiner
<input type="checkbox"/> Off-Specification Used Oil Burner
<input type="checkbox"/> Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil
<input type="checkbox"/> Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

Eligible Academic Entities with Laboratories: Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

<input type="checkbox"/> College or University
<input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
<input type="checkbox"/> Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

D001	D002	D003	D008	D018	D035	D038
F005	K011	K013	K014	P063	U003	U009

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

Announced Yes No Additional Facility Representatives: **Chad Ulm 419-226-1407**

Tanks Yes No

Containers Yes No

Name of Inspector(s) Name of Inspector(s) Date of Inspection/Time (mm/dd/yyyy) (hh:mm)

Kara Reynolds **Gary Deutschman** **06-11-2012 9:25 AM**

Comments:

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Ineos USA LLC

Facility Type: TSD/LQG

Date of Inspection: 06-11-2012

EPA ID#: OHD042157644

Waste Generated			On-or-Off-Site Management		P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining, bag house, painting, general maintenance, etc.)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applic.	QTY Generated per Month, Type of Accumulation (container, tank, etc.) and location of waste accumulation area	Type of On-Site Treatment (recycle, wwt, etc.)	Name, state, and type of activity occurring at the off-site facility	Current P2 Activities	P2 Opportunities
1 Deepwell System Pretreatment	Deepwell Filter Cake D003, D018, D038, K011, K013, K014, P063, U003, U009	188,159 pounds per year Roll-off box Deepwell filter building	N/A	Veolia ES Technical Solutions, IL, H040	N/A	N/A
2 Facility Maintenance (Sandblasting from painting)	Lead Contaminated Soil/Debris D008	This waste stream has not been generated yet this year and may not be generated this year.	N/A	N/A	N/A	N/A
3 Catalyst Plant Sump	Catalyst Plant Scrubber Water D002	49,072 tons per year Tank Catalyst Plant	On-Site Deepwell	Ineos USA LLC, Ohio, H134	N/A	N/A
4 Acrylonitrile Production	Bottom Stream from Wastewater Stripper K011	401,133 tons per year Tank Acrylonitrile Production Area	On-Site Deepwell	Ineos USA LLC, Ohio, H134	N/A	N/A
5 Acrylonitrile Production	Bottom Stream from Acetonitrile Column K013	377,279 tons per year Tank Acrylonitrile Production Area	On-Site Deepwell	Ineos USA LLC, Ohio, H134	N/A	N/A

6	Acetonitrile Production	Bottom Stream from Acetonitrile Production K014	160,675 tons per year Tank Acetonitrile Production Area	On-Site Deepwell	Ineos USA LLC, Ohio, H134	N/A	N/A
7	Barex Laboratory Waste	MEK D001, D035, F005	1,126 pound per year Drum Barex Laboratory	N/A	Safety-Kleen Corp., Kentucky, H061	N/A	N/A
8	Spent Caustic from Vessel Cleaning	Sodium Hydroxide D002	102 tons per year Tank Acrylonitrile and Acetonitrile Production Area	On-Site Deepwell	Ineos USA LLC, Ohio, H134	N/A	N/A
9	Surge Tank Cleaning	Solids/Sludge D003, D038, K011, K013, K014, U003, U009	This waste stream has not been generated yet this year and may not be generated this year.	N/A	N/A	N/A	N/A
10	Maintenance	Used oil	~5000 gallons per year Totes Maintenance shop	N/A	United Waste Waters, Ohio	N/A	N/A
11	Maintenance	Universal waste lamps	~100 lamps per months Boxes Barrel Yard	UW Storage	Safety-Kleen Systems, Inc., Texas	Recycle	N/A
12	Maintenance (mostly from changing battery back-up operated devices)	Universal waste batteries	Unknown Pallet Barrel Yard	UW Storage	Veolia ES Technical Solutions, Ohio	Recycle	N/A
13	Vapor Extraction System	Spent Carbon Filters (for air) D001, U003, U009	990 pounds per year Drums Barrel Yard	Storage	Safety-Kleen Corp.;H061	N/A	N/A

14	Product Tank Maintenance	Methyl Acrylate Filters D001	This waste stream has not been generated yet this year and may not be generated this year.	N/A	N/A	N/A	N/A
15	Product Tank Maintenance	Acrylo Filters (spent liquid product filters) D001, U009	400 pounds per year Drums Barrel Yard	Storage	Safety-Kleen Corp., Kentucky, H141	N/A	N/A
16	Loading Rack Maintenance	Filters from Acrylo and Aceto Loading Rack D001, U003, U009	Unknown Drum Barrel Yard	Storage		N/A	N/A
17	Maintenance during Turn-Around (vacuumed out bottom of tank, sandy liquid generated from tank repair)	Sulfuric Acid Tank Bottom D002	12,240 pounds per year Unknown Unknown	Storage	Dynecol, Inc., Michigan H077	N/A	N/A
18	Facility Maintenance	Mercury Switches D009	225 pounds per month Drum Barrel Yard	Storage	Safety-Kleen, Illinois, H141	N/A	N/A
19	Maintenance	Spent parts washer fluid					
20							

21							
30							

REMARKS/GENERAL INFORMATION

General Process Information: See Letter

Regulatory/Enforcement History (if applicable): N/A

Additional P2 remarks and information: N/A

Would this facility be interested in a P2 assessment? **NO** If yes, refer promptly to your district P2 coordinator.

Office of Compliance Assistance and Pollution Prevention-1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/qcapp/ocapp.html

Other: N/A

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

Facility: Ineos USA LLC Ohio Permit: 03-02-0450

Address: 1900 Fort Amanda Road U.S. EPA ID: OHD042157644
Lima, Ohio 45804-0628 Phone: 419-226-1200

County: Allen

Inspection Date: 6 / 11 / 2012 Time: 9:30 AM

Was advance notice of the inspection given? X YES NO
 If so, how far in advance? 7 calendar days

Name Agency/Title Phone

Inspectors: Kara Reynolds Ohio EPA-DMWM 419-373-3065
Gary Deutschman Ohio EPA-DMWM 419-373-3056

Facility Reps: Joe Bianco Ineos USA LLC 419-226-1351
Chad Ulm Ineos USA LLC 419-226-1407

Is facility operating as a generator? X YES NO

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

PERMIT STATUS

Permit Issued: 12/20/2002 LDR Checklist Attached: x Yes No
 Permit Effective Date: 12/20/2002 Used Oil Checklist Attached: x Yes No
 Permit Expiration Date: 12/20/2012 Generator Checklist Attached: x Yes No
 Permit Renewal Date: 06/23/2012 Universal Waste Checklist Attached: x Yes No
 Permit Modification Date(s): 03-21-2012; 04-20-2012

AUTHORIZED ACTIVITIES

<u>STORAGE</u>		<u>TREATMENT</u>		<u>DISPOSAL</u>	
<u>X</u>	Containers	<u>X</u>	Tanks	<u>X</u>	Injection Well
<u>X</u>	Tanks		Incinerator		Landfill
	Waste Pile		Thermal Treatment		Land Application
	Surface Impoundment		Post-Closure		Surface Impoundment

 Post-Closure Care Corrective Action

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1. Has the expiration date of the permit passed? If so: Yes ___ No X N/A ___ RMK#
- a. Is the permittee continuing any activity regulated by the permit after the expiration date of the permit? Yes ___ No ___ N/A X RMK#
- b. Has the facility submitted an application for a permit renewal to the director no later than 180 days prior to the expiration date of the permit? [Condition A.6] Yes X No ___ N/A ___ RMK#
2. Has the permittee submitted the annual permit fee, payable to "Treasurer, State of Ohio," to Ohio EPA on or before the anniversary of the date of issuance during the term of the permit? [Condition A.26] Yes X No ___ N/A ___ RMK# 1
3. Is the permittee conducting any hazardous waste management activities (not otherwise exempt by law) which are not authorized by the permit? [Condition A.4] Yes ___ No X N/A ___ RMK#
4. Have any provisions of the permit been identified as invalid? [Condition A.4] Yes ___ No X N/A ___ RMK#
5. Has the facility identified any instances of noncompliance with the permit, ORC Chapter 3734, or the rules adopted thereunder, which may endanger human health or the environment? If so: Yes ___ No X N/A ___ RMK#
- a. Did the facility immediately report the following to Ohio EPA's Emergency Response Unit? [Condition A.20]
- i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and Yes ___ No ___ N/A X RMK#
- ii. Information concerning a release of hazardous waste, fire or explosion at the facility which could threaten human health or the environment outside the facility including a description of:
- A. Name, address and telephone number of the owner/operator? Yes ___ No ___ N/A X RMK#
- B. Name, address and telephone number of the facility? Yes ___ No ___ N/A X RMK#

- C. Name and quantity of material(s) involved? Yes__ No__ N/A X RMK#
- D. The extent of injuries, if any? Yes__ No__ N/A X RMK#
- E. An assessment of the actual or potential hazard to the environment and human health outside the facility? Yes__ No__ N/A X RMK#
- F. Estimated quantity and disposition of recovered material that resulted from the incident? Yes__ No__ N/A X RMK#
6. Did the permittee provide a written report to Ohio EPA's Emergency Response Unit within five days of becoming aware of the circumstances reported in Questions No. 5? If so, did the report contain: [Condition A.21]
- a. A description of the noncompliance and its cause (including exact dates and times)? Yes__ No__ N/A X RMK#
- b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? and Yes__ No__ N/A X RMK#
- c. Steps taken or planned to minimize the impact on the environment and to reduce, eliminate and prevent recurrence of the noncompliance? Yes__ No__ N/A X RMK#
- NOTE:** *The permittee need not comply with the five day written report requirement if the director, upon good cause shown by the permittee, waives that requirement and the permittee submits a written report within 15 days of the time the permittee became aware of the circumstances. [Condition A.21].*
7. Has the permittee identified other instances of noncompliance not provided for in Condition A.20, if so: Yes__ No__ N/A X RMK#
- a. Did the permittee report these instances to Ohio EPA, DHWM? [Condition A.22]? Yes__ No__ N/A X RMK#
- b. Do the reports provided contain the information set forth in Condition A-20? [Condition A.22] Yes__ No__ N/A X RMK#
- c. Has the permittee expeditiously taken all steps necessary to minimize any adverse impact on the environment? [Condition A.8] Yes__ No__ N/A X RMK#

8. Has the permittee planned any changes in the permitted facility or activity which may result in noncompliance with the conditions of the permit? Yes ___ No X N/A ___ RMK#

a. If so, has the facility provided Ohio EPA with advance notice of such changes? [Condition A.17] Yes ___ No ___ N/A X RMK#

NOTE: Such notification does not waive the permittee's duty to comply with the permit. [Condition A.5]

PERMIT MODIFICATION, REVISION, REVOCATION

9. Has the permittee filed a request for a permit modification, revision or revocation since permit issuance? [Condition A.2] Yes X No ___ N/A ___ RMK#

10. Has the permit, been transferred to a new owner/operator? If so: Yes ___ No X N/A ___ RMK#

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

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

11. Has the permittee submitted reports in any compliance schedule of the permit to Ohio EPA no later than 14 days following each scheduled date, unless otherwise specified? [Condition A.19] Yes X No ___ N/A ___ RMK#

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

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

14. Has the permittee become aware that it failed to submit any relevant facts in the permit or issuance proceedings or that it submitted incorrect or incomplete information in permit issuance proceedings or other submissions to Ohio EPA? If so: Yes ___ No X N/A ___ RMK#

a. Has the permittee properly submitted such facts or corrected information to the appropriate entity? [Condition A.24] Yes__ No__ N/A X RMK#

15. Is the permittee maintaining records of all data used to complete the application and any amendments, revisions or modifications to the application? [Condition A.14] Yes X No__ N/A__ RMK#

16. Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14] Yes X No__ N/A__ RMK#

17. Is the permittee planning any physical alterations or additions to any permitted portions of the facility? If so: Yes__ No X N/A__ RMK#

a. Has the permittee given notice to the director of such alterations/additions? [Condition A.15] Yes__ No__ N/A X RMK#

SITE ENTRY - AVAILABILITY OF RECORDS

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

a. Enter at reasonable times upon the premises where a regulated activity is located or where records are kept under the conditions of the permit? Yes X No__ N/A__ RMK#

b. Have access to and copy, at reasonable times, any records required to be kept under the conditions of the permit? Yes X No__ N/A__ RMK#

c. Inspect, at any time, facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit? Yes X No__ N/A__ RMK#

d. Sample, document, photograph or monitor, at reasonable times, any substances or parameter at the location of the facility to assure compliance with the permit or as otherwise authorized by ORC Chapter 3734. and the rules adopted thereunder? Yes X No__ N/A__ RMK#

APPLICATION ACTIVITIES

Note: The inspector or permit writer may add questions pertaining to the permittees application, as appropriate.

REMARKS

1.Ineos paid \$2700 on December 8, 2011.

RECORDKEEPING/OPERATING REQUIREMENTS

OPERATING RECORD

1. In accordance with OAC rules 3745-54-73 and Condition B.22 of the permit, does the permittee maintain an Operating Record which contains the following information:
- a. A description of the quantity of each hazardous waste and the method(s) and date(s) of its treatment or storage including cross-reference to specific manifest numbers? Yes X No__ N/A ___ RMK#
 - b. The location of each hazardous waste and quantity at each location? Yes X No__ N/A ___ RMK#
 - c. Records and results of waste analysis? Yes X No__ N/A ___ RMK#
 - d. Summary reports and details of all incidents that required implementation of the contingency plan? Yes X No__ N/A ___ RMK#
 - e. Records and results of inspections? Yes X No__ N/A ___ RMK#
 - f. Documents required to be maintained by LDR requirements of OAC Chapter 3745-270? Yes X No__ N/A ___ RMK#
 - g. **For disposal facilities**, location and quantity of each hazardous waste record on a facility map and cross-references to manifest document numbers? [3745-54-73(B)(2)] Yes X No__ N/A ___ RMK#

DOCUMENTS TO BE MAINTAINED AT FACILITY

2. In accordance with Condition A.28 of the permit, is the permittee maintaining the following documents at the facility:
- a. Waste analysis plan in accordance with OAC rule 3745-54-13? [Condition A.28(a)(i)] Yes X No__ N/A ___ RMK#
 - b. Contingency plan in accordance with OAC rule 3745-54-53? [Condition A.28(a)(ii)] Yes X No__ N/A ___ RMK#
 - c. Closure plan in accordance with OAC rule 3745-55-12? [Condition A.28(a)(iii)] Yes X No__ N/A ___ RMK#

- d. Cost estimate for facility closure in accordance with OAC rule 3745-55-42? (Estimate only - adequacy will be evaluated by CO financial assurance personnel) [Condition A.28(a)(iv)] Yes X No__ N/A ___ RMK#
- e. Personnel training plan and records required by OAC rule 3745-54-16? [Condition A.28(a)(v)] Yes X No__ N/A ___ RMK#
- f. Inspection schedules developed in accordance with OAC rule 3745-54-15 and OAC rule 3745-55-74? [Condition A.28(a)(vii)] Yes X No__ N/A ___ RMK#
- g. Operating record in accordance with OAC rule 3745-54-73? [Condition A.28(a)(vi)] Yes X No__ N/A ___ RMK#
- h. Post-closure plan, as required by OAC rule 3745-55-18(A)? [Condition M.1] Yes X No__ N/A ___ RMK#
3. Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from date of inspection? [Condition A.28(c)] Yes X No__ N/A ___ RMK#
4. Have any of the documents in Question No. 2 been revised? [Condition A.28(b)] If so: Yes X No__ N/A ___ RMK#
- a. Has the permittee submitted the revisions to Ohio EPA in accordance with OAC rule 3745-50-51? Yes X No__ N/A ___ RMK#
- b. Has the permittee received approval in accordance with OAC rule 3745-50-51 to make such changes? Yes X No__ N/A ___ RMK#

ANNUAL REPORT REQUIREMENT

5. Is the permittee complying with annual report requirements set forth in OAC rule 3745-54-75 and the additional report requirements set forth in OAC rule 3745-54-77? [Condition B.25] Yes X No__ N/A ___ RMK#

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

6. In compliance with Condition A.12 of the permit, do the permittee's records of monitoring information specify the:
- a. Date(s), exact place(s), time(s) and method(s) of sampling or measurement? Yes No__ N/A ___ RMK#
 - b. Individual(s) who performed the sampling or measurement? Yes No__ N/A ___ RMK#
 - c. Date(s) analyses were performed? Yes No__ N/A ___ RMK#
 - d. Individual(s) who performed the analyses? Yes No__ N/A ___ RMK#
 - e. Analytical technique(s) or method(s) used? Yes No__ N/A ___ RMK#
 - f. Results of such analyses? Yes No__ N/A ___ RMK#
7. Have the methods used to obtain a representative sample of the waste to be analyzed included the appropriate SW-846 method or an equivalent method specified in the approved waste analysis plan? [Condition A.12] Yes No__ N/A ___ RMK#
8. In accordance with Condition A.14 of the permit, is the permittee retaining records of monitoring information as required by the permit for at least three years from the date of sampling, including:
- a. All calibration and maintenance records. Yes No__ N/A ___ RMK#
9. Has Ohio EPA requested submittal of any reports or other information from the permittee? If so: Yes__ No N/A ___ RMK#
- a. Have the submittals been signed and certified according to OAC rule 3745-50-42? [Condition A.13] Yes__ No__ N/A RMK#

REMARKS

WASTE MINIMIZATION REQUIREMENTS

1. Does the permittee certify at least once every year that a program is in place to reduce the volume and toxicity of hazardous waste generated in accordance with Condition A.29 and OAC rule 3745-54-73? Yes X No__ N/A__ RMK#

2. Did the permittee submit the waste minimization report to Ohio EPA, Technical Assistance Section, Office of Pollution Prevention and Northwest District Office within 180 days of journalization of this permit? and updates biennially thereafter? [Condition A.29(c)] Yes X No__ N/A__ RMK#

3. Has the permittee reduced the amount of waste (hazardous waste, solid waste, air emission, waste water discharges, etc.) this year generated at their facility by implementing pollution prevention/waste minimization? Yes__ No X N/A__ RMK#

If so, what amount of waste has the permittee reduced this year? _____

4. Has the permittee's company saved much money this year by implementing pollution prevention (reducing raw material usage, disposal fees, energy savings, etc.)? Yes__ No X N/A__ RMK#

If so, how much money has the permittee's company saved this year? _____

NOTE: If this facility is inspected two times a year, the information obtained in questions 3 & 4 only needs to be collected one time for the calendar year.

REMARKS

GROUND WATER MONITORING

1. Has the permittee conducted semi-annual sampling of their monitoring wells? Yes X No__ N/A__ RMK#

2. Have they reported the results in the Annual Report to the director by March 1st as required by Condition J.8(c)? Yes X No__ N/A__ RMK#

REMARKS

OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS

1. Is the permittee complying with the following manifest requirements set forth in OAC Chapter 3745-52 and OAC rules 3745-54-70, 3745-54-71, 3745-54-72 and 3745-54-76: [Condition B.24]
- a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, U.S. EPA Form 8700-22 and, if necessary, U.S. EPA Form 8700-22A in compliance with OAC rule 3745-52-20(A)? Yes X No ___ N/A ___ RMK#
 - b. The manifest form used contains all information required by OAC rule 3745-52-20 and the minimum number of copies required by OAC rule 3745-52-22? Yes X No ___ N/A ___ RMK#
 - c. The permittee has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with OAC rule 3745-52-20(B)(C)(D)? Yes X No ___ N/A ___ RMK#
 - d. Prepared manifests have been signed by the permittee and initial transporter in compliance with OAC rule 3745-52-23? Yes X No ___ N/A ___ RMK#
2. Are signed copies of all hazardous waste manifests and any documentation required for exception reports retained for at least three years at the facility as required by OAC rules 3745-52-40 and 3745-54-71(A)(5)? Yes X No ___ N/A ___ RMK#
3. Does the permittee use only properly registered transporters when removing hazardous wastes? [Condition A.16] Yes X No ___ N/A ___ RMK#

Transporters:
Veolia ES Technical Solutions
Safety-Kleen Corp.
United Waste Waters
Dynecol, Inc.

4. Is one copy of the manifest given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least three years? [3745-54-71(A)]
 Yes No__ N/A ___ RMK#
- a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met? [3745-54-71(B)]
 Yes__ No__ N/A RMK#
- b. Are any significant discrepancies in the manifest, as defined in 3745-54-72(A) noted in writing on the manifest document?
 Yes No__ N/A ___ RMK#
5. Have any manifest discrepancies been reconciled within 15 days as required by 3745-54-72(B) or has the owner/operator submitted the required information to the director?
 Yes No__ N/A ___ RMK#
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-54-76(A) been submitted to the director within 15 days?
 Yes__ No__ N/A RMK#

WASTE ANALYSIS/WASTE ANALYSIS PLAN

1. Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information of the waste in accordance with OAC Chapters 3745-54 to 3745-57, 3745-218 and 3745-270 and the terms and conditions of the permit? [Condition B.3]
 Yes No__ N/A ___ RMK#
2. Does the permittee follow the procedures described in the WAP (Application Section C??)? [Condition B.3]
 Yes No__ N/A ___ RMK#
3. In accordance with OAC rule 3745-54-13(A)(3), does the permittee repeat the waste analysis when the process or operation generating the hazardous waste has changed, or at least annually? [Condition B.3]
 Yes No__ N/A ___ RMK#
4. Does the permittee place the results of all waste analyses in the facility operating record in accordance with OAC rule 3745-54-73?
 Yes No__ N/A ___ RMK#

REMARKS

GENERAL INSPECTION REQUIREMENTS

1. Is the permittee following the inspection procedures and schedules as set forth in the permit (F-2 of the approved Part B permit application) and the requirements of OAC rules 3745-54-15(A), (C) and (D)? [Condition B.5] Yes X No__ N/A__ RMK#
2. Is the permittee following the approved inspection schedule for inspecting: monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment as specified in OAC rule 3745-54-15(B)? Yes X No__ N/A__ RMK#
- a. Is the schedule kept at the facility? [OAC rule 3745-54-15(B)(2)] Yes X No__ N/A__ RMK#
3. Does the permittee remedy deterioration or any malfunctions discovered by an inspection as required by OAC rule 3745-54-15(C)? [Condition B.5] Yes X No__ N/A__ RMK#
4. Is the permittee maintaining records of inspections (for three years) as required by OAC rule 3745-54-15(D)? [Condition B.5] Yes X No__ N/A__ RMK#
5. In accordance with OAC rule 3745-54-15(D) and Condition C.8 of the permit, do inspection records contain the following information:
- a. Date and time of inspection? Yes X No__ N/A__ RMK#
- b. Signature of inspector? Yes X No__ N/A__ RMK#
- c. Notation of observations made? Yes X No__ N/A__ RMK#
- d. Date and nature of any repairs or other remedial actions? Yes X No__ N/A__ RMK#

REMARKS

SECURITY REQUIREMENTS

1. Is the permittee complying with the following security provisions of OAC rule 3745-54-14 and Condition B.4 of the permit: [Section F-1 of the Part B permit application]
- a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility? Yes X No__ N/A ___ RMK#
 - b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility? Yes X No__ N/A ___ RMK#
 - c. A means to control entry, at all times, through gates or other entrances, to the active portion of the facility? Yes X No__ N/A ___ RMK#
2. In accordance with OAC rule 3745-54-14(C), does the permittee have signs reading "Danger - Unauthorized Personnel Keep Out" posted at entrances of the hazardous waste container storage building number S01. Yes X No__ N/A ___ RMK#

FACILITY OPERATIONS

3. Is construction, maintenance and operation of the facility being conducted to minimize the possibility of a fire, explosion, or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, ground or surface water? [Condition B.1] Yes X No__ N/A ___ RMK#
4. Does the permittee properly maintain and operate the facility to achieve compliance with the terms and conditions of the permit including: [Condition A.9]
- a. Effective management practices? Yes X No__ N/A ___ RMK#
 - b. Adequate funding? Yes X No__ N/A ___ RMK#
 - c. Adequate operator staffing and training? Yes X No__ N/A ___ RMK#
 - d. Adequate laboratory and process controls? Yes X No__ N/A ___ RMK#

REMARKS

PERSONNEL TRAINING

1. Is the permittee conducting personnel training in accordance with the conditions of the permit and with the following requirements of OAC rule 3745-54-16: [Condition B.6] Yes X No__ N/A__ RMK#
- a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC rule 3745-54-16(A)(B)(C)] Yes X No__ N/A__ RMK#
- b. The facility provides personnel training to new employees within six months after their date of employment as required by OAC rule 3745-54-16(B)? Yes X No__ N/A__ RMK#
- c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(C)? Yes X No__ N/A__ RMK#
2. Is the permittee maintaining personnel training records as required by OAC rule 3745-54-16(D) and of the approved application, including: written job titles, job descriptions and documented employee training records? [Condition B.6] Yes X No__ N/A__ RMK#

REMARKS

REQUIRED EQUIPMENT

1. Has the permittee equipped the facility with the following emergency equipment as required by OAC rule 3745-54-32 and Condition B.9 of the permit:
- a. An internal communications or alarm system? Yes X No__ N/A__ RMK#
- b. A device such as a telephone which is capable of summoning emergency assistance from local emergency authorities? Yes X No__ N/A__ RMK#
- c. Portable fire extinguishes and/or fire control equipment? Yes X No__ N/A__ RMK#
- d. Water in adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers or water spray systems? Yes X No__ N/A__ RMK#

2. Is the permittee inspecting, testing and maintaining the equipment specified in Question No. 1 to ensure its proper operating in accordance with OAC rule 3745-54-33 and Condition B.10 of the permit? Yes No__ N/A__ RMK#

3. Whenever hazardous waste is being managed at the facility, has the permittee provided all personnel involved in the operation with immediate access to an internal alarm or emergency communication device as required by OAC rule 3745-54-34 and Condition B.11 of the permit? Yes No__ N/A__ RMK#

REMARKS

CONTINGENCY PLAN - EMERGENCY PROCEDURES

1. In compliance with Condition B.13 of the permit and OAC rule 3745-54-37(A) and (B), does the permittee:
- a. Familiarize emergency response agencies with the layout of the facility, associated hazards, places where personnel will normally be working, entrances and possible evacuation routes? Yes No__ N/A__ RMK#
 - b. Inform such agencies of safety equipment, supplies, proper emergency safety procedures that are applicable to the facility? Yes No__ N/A__ RMK#
 - c. Familiarize the local hospital listed in the approved application with the properties of hazardous waste handled at the facility and the types of injuries or illness that could result from fires, explosions or releases at the facility? Yes No__ N/A__ RMK#
2. Has a state or local agency dedined to enter into the arrangements set forth in OAC rule 3745-54-37(A)? If so Yes__ No N/A__ RMK#
- a. Has the permittee documented the refusal in the operating record as required by OAC rule 3745-54-37(B) [Condition B.13]? Yes__ No__ N/A RMK#
3. Has the permittee, in accordance with OAC rule 3745-54-53 submitted a copy of the approved contingency plan (including amendments, revisions or changes) to all local authorities, agencies and response contractors designated in the approved contingency plan? [Condition B.18] Yes No__ N/A__ RMK#
4. Has the permittee notified all parties identified in the contingency plan in writing of amendments, modifications, or revisions to the plan within ten days of the effective date of the change in the plan? [Condition B.18] Yes No__ N/A__ RMK#

5. Has the permittee submitted a copy of the approved contingency plan and all revisions, amendments and modifications to the Ohio EPA, Division of Emergency and Remedial Response (DERR) in accordance with OAC rule 3745-54-53? [Condition B.18] Yes X No__ N/A__ RMK#

6. Is the permittee reviewing the approved contingency plan at least annually and amending the plan immediately if needed in compliance with OAC rule 3745-54-52? [Condition B.17] Yes X No__ N/A__ RMK#

NOTE: Also see Question No. 4 of Recordkeeping Requirements to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.

EMERGENCY COORDINATOR

7. In accordance with OAC rule 3745-54-55 and Condition B.19 of the permit, is an emergency coordinator on premises or on call at all times? Yes X No__ N/A__ RMK#

8. In accordance with OAC rule 3745-54-55 and Condition B.19 of the permit, is/are the emergency coordinator(s) at the facility familiar with the following:

a. Contingency plan? Yes X No__ N/A__ RMK#

b. Facility operations/activities? Yes X No__ N/A__ RMK#

c. Waste characterization and location? Yes X No__ N/A__ RMK#

d. Location of all records in the facility? Yes X No__ N/A__ RMK#

e. Facility layout? Yes X No__ N/A__ RMK#

9. In accordance with OAC rule 3745-54-55, does/do the emergency coordinator(s) have the authority to commit the resources needed to carry out the contingency plan? [Condition B.19] Yes X No__ N/A__ RMK#

10. Does the permittee have a contingency plan for the facility that: [Condition B.15]

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

Yes X No__ N/A ___ RMK#

b. Describes arrangements agreed to by local police, fire departments, hospitals, contractors and Ohio EPA and the local emergency response team to coordinate emergency services?

Yes X No__ N/A ___ RMK#

c. Includes an up-to-date list of names, addresses and phone numbers (office and home) for all persons qualified to act as emergency coordinator in the order that they will assume responsibility for coordination of emergency response?

Yes X No__ N/A ___ RMK#

d. Includes a list of all emergency equipment, including fire extinguishing systems, spill control equipment, communications and alarm systems and decontamination equipment?

Yes X No__ N/A ___ RMK#

e. Includes the location and a physical description of each item on the list referenced in Question No. 10(d), and a brief outline of its capabilities?

Yes X No__ N/A ___ RMK#

f. Includes an evacuation plan for facility personnel describing signals to be used to begin evacuation, evacuation routes, and alternate evacuation routes, in situations where the primary routes could be blocked by releases of hazardous waste?

Yes X No__ N/A ___ RMK#

REMARKS

IMPLEMENTATION OF CONTINGENCY PLAN

11. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents at the facility including spill or release of hazardous waste or hazardous waste constituents greater than or equal to 55 gallons; any spill or release of hazardous waste or hazardous waste constituents less than 55 gallons may result in a fire or explosion hazard as determined by the Emergency Coordinator; or any spill on-site that may potentially cause on or off-site soil and/or ground or surface water contamination; any spill or release of hazardous waste or hazardous waste constituents that is reported to the National Response Center or local (city or county) emergency response center because the spill exceeded the RQ limits; any fire involving hazardous waste; any explosion involving hazardous waste; since the date of the last inspection? If so
- Yes ___ No ___ N/A X RMK#
- a. Did the permittee immediately implement the approved contingency plan and follow the emergency procedures described in OAC rule 3745-54-56? [Condition B.16]
- Yes ___ No ___ N/A X RMK#
- b. Did the permittee immediately notify Ohio EPA's emergency response team using the 24-hour toll free number (800)282-9378 providing the following information: [OAC rule 3745-54-56(D)(2)]
- i. Name and telephone number of the reporter?
- Yes ___ No ___ N/A X RMK#
- ii. Name and address of the facility?
- Yes ___ No ___ N/A X RMK#
- iii. Time and type of incident?
- Yes ___ No ___ N/A X RMK#
- iv. Name and quantity of materials involved?
- Yes ___ No ___ N/A X RMK#
- v. The extent of injuries?
- Yes ___ No ___ N/A X RMK#
- vi. The possible hazards to human health or the environment outside the facility?
- Yes ___ No ___ N/A X RMK#
- c. Did the permittee collect and manage as hazardous waste all liquid or solid material resulting from fire, explosion, released material or emergency response materials until such time as the permittee can demonstrate to Ohio EPA that such waste are not hazardous wastes? [Condition B.16]
- Yes ___ No ___ N/A X RMK#

d. Within 15 days of the incident did the permittee submit to the director a written report of the incident?
If so:

Yes ___ No ___ N/A X RMK#

i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23]

Yes ___ No ___ N/A X RMK#

e. Did the permittee note in the operating record the time, date and details of any incident that required the implementation of the approved contingency plan as required by OAC rule 3745-54-56(J)? [Condition B.23]

Yes ___ No ___ N/A X RMK#

REMARKS

PREPAREDNESS AND PREVENTION

1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-54-31, and Condition B.1]

Yes X No ___ N/A ___ RMK#

2. If required due to actual hazards associated with the waste, does the facility have the following equipment: [Condition B.9]

a. Internal alarm system?

Yes X No ___ N/A ___ RMK#

b. Access to telephone, radio or other device for summoning emergency assistance?

Yes X No ___ N/A ___ RMK#

c. Portable fire control equipment, spill control and decontamination equipment?

Yes X No ___ N/A ___ RMK#

d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?

Yes X No ___ N/A ___ RMK#

3. Is all required spill control and decontamination equipment, fire and communications equipment tested as necessary to assure its proper operation in time of emergency? [3745-54-33, and Condition B.10]

Yes X No ___ N/A ___ RMK#

4. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device? [3745-54-34, and Condition B.11]

Yes X No ___ N/A ___ RMK#

REMARKS

CLOSURE REQUIREMENTS

1. Does the permittee maintain the approved closure plan at the facility? [Condition B.29] Yes No ___ N/A ___ RMK#
2. Is the permittee keeping at the facility and submitting annually to Ohio EPA, the latest closure cost estimate as required by OAC rule 3745-55-42(D) [Condition B.36] Yes No ___ N/A ___ RMK#
3. Has the permittee amended the closure plan? If so: Yes No ___ N/A ___ RMK#
- a. Has the plan been amended in accordance with OAC rule 3745-55-12 and 3745-50-51? [Condition B.28] Yes No ___ N/A ___ RMK#
- NOTE:** Also see Recordkeeping Requirements (Question #4) in order to verify that any changes to the closure plan were submitted in accordance with OAC rule 374550-51.
4. Has the permittee closed the facility? If so: Yes ___ No N/A ___ RMK#
- a. Did the permittee complete closure of the facility 180 days after receiving the final volume of hazardous waste, as required by Condition B.31 of the permit? Yes ___ No ___ N/A RMK#
- b. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.31] Yes ___ No ___ N/A RMK#
- c. Did the permittee carry out the approved closure plan as set forth in Section I of the approved permit application? [Condition B.26] Yes ___ No ___ N/A RMK#
- d. After receiving the final volume of hazardous waste, did the permittee removal all hazardous waste and complete closure activities in accordance with the schedule specified in the approved closure plan and as required by OAC rule 3745-55-13? [Condition B.31] Yes ___ No ___ N/A RMK#
- e. Has the permittee decontaminated and/or disposed of all facility equipment, structures and soils as required by OAC rule 3745-55-14 and the approved closure plan? [Condition B.32] Yes ___ No ___ N/A RMK#
- f. Has the permittee certified that the facility has been closed in accordance with the specifications in the approved closure plan as required by OAC rule 3745-55-15? [Condition B.33] Yes ___ No ___ N/A RMK#

g. Has the permittee submitted a survey plat to the director and local zoning authority no later than the submission of certification of closure of each hazardous waste disposal unit? [Condition B.34]

Yes ___ No ___ N/A X RMK#

REMARKS

POST-CLOSURE MAINTENANCE

1. Has the permittee inspected the components, structures, and equipment at the site in accordance with the inspection schedule in Section 18.3 and Table 18.3-1 of the approved Post-Closure Plan on a quarterly basis? [OAC rule 3745-55-17(A)(1)(b)] [Condition M.2]

Yes X No ___ N/A ___ RMK#

2. Has the permittee conducted and recorded an inspection of at least the following? [Condition M.3]

Yes X No ___ N/A ___ RMK#

a. Security control devices (gates, locks, fences and signs);

Yes X No ___ N/A ___ RMK#

b. Erosion control;

Yes X No ___ N/A ___ RMK#

c. Cover settlement, subsidence and displacement;

Yes X No ___ N/A ___ RMK#

d. Vegetative cover conditions;

Yes X No ___ N/A ___ RMK#

e. Integrity of run-on/run-off control measures;

Yes X No ___ N/A ___ RMK#

f. Cover drainage system functioning;

Yes X No ___ N/A ___ RMK#

g. Monitor well conditions; and

Yes X No ___ N/A ___ RMK#

h. Benchmark integrity.

Yes X No ___ N/A ___ RMK#

3. Is the permittee using the inspection forms found in the approved Post Closure Plan?

Yes X No ___ N/A ___ RMK#

4. Have suitable repairs been made within a reasonable amount of time? [Condition M.3]

Yes ___ No ___ N/A X RMK#

5. Have repairs been indicated on the Notification Repair Form?

Yes ___ No ___ N/A X RMK#

6. Was the Notification of Repair Form submitted to Ohio EPA within one week after determining that repairs are necessary?

Yes ___ No ___ N/A X RMK#

REMARKS

The Permittee shall provide post-closure care for Cell #1 (V-Pond) and Cell #2 (Deepwell and Burn Pond). The two units closed as landfills are subject to post-closure care requirements for 30 years. The post-closure care includes maintenance of the landfill caps, leachate management, storm water management, security, financial assurance and ground water monitoring.

STORAGE OF HAZARDOUS WASTES IN CONTAINERS

NOTE: The requirements of Conditions C.1(a) and C.2 do not apply to the permittee's activities as a generator accumulating hazardous waste for <90 days per OAC rule 374552-34(A). Please complete the applicable sections of the Generator Requirements checklist to document compliance with activities associated with <90 day accumulation of wastes.

CONDITION OF CONTAINERS

1. Are containers holding hazardous wastes in good condition as required by OAC 3745-55-71? [Condition C.3]
If not: Yes X No__ N/A__ RMK#
- a. Did the permittee transfer the hazardous waste from such a container to one that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit? [Condition C.3] Yes__ No__ N/A X RMK#
2. Does the permittee ensure that all containers used at the facility are compatible with the hazardous waste to be stored in them as required by OAC rule 3745-55-72? [Condition C.4] Yes X No__ N/A__ RMK#
3. Does the permittee keep all containers closed during storage except when it is necessary to add or remove waste as required by OAC rule 3745-55-73? [Condition C.5] Yes X No__ N/A__ RMK#
4. Does the permittee store all containerized hazardous waste on the container storage containment system as described in Condition C.5 of the permit? [Condition C.1] Yes X No__ N/A__ RMK#

INSPECTIONS

5. Is the permittee inspecting the container area weekly in accordance with OAC rule 3745-55-74 and the approved inspection schedule in Section F-2 of the Part B permit application to detect leaking containers and deterioration of containers and the containment system? [Condition C.8] Yes X No__ N/A__ RMK#
- a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken as required by OAC rule 3745-54-15(D) and OAC rule 3745-54-73(B)(5)? Yes X No__ N/A__ RMK#

CONTAINMENT SYSTEM

6. Does the permittee maintain the containment system as described in the approved permit application, Section D, including: [Condition C.6] Yes X No__ N/A__ RMK#
- a. Sufficient capacity to hold 10% of the total volume of containers? Yes X No__ N/A__ RMK#
- b. A system which is free of gaps and sufficiently impervious to contain leaks and spills? Yes X No__ N/A__ RMK#
7. Has the permittee had a spill or leak of wastes? If so Yes__ No X N/A__ RMK#
- a. Was spilled or leaked waste removed in a timely manner? [Condition C.6] Yes__ No__ N/A X RMK#

NOTE: *This time period is not to exceed 24 hours. [Condition C.6]*
AISLE SPACE

8. Is the permittee maintaining adequate aisle space to allow unobstructed movement of personnel and equipment in the event of an emergency as required by OAC rule 3745 54-35 and Condition B.12 of the permit? Yes X No__ N/A__ RMK#

REMARKS

LAND DISPOSAL RESTRICTION REQUIREMENTS

NOTE: In order to determine compliance with the following permit conditions, please complete the LDR checklist:

1. Does the permittee comply with all applicable regulations regarding land disposal prohibitions and restrictions as required by OAC Chapter 3745-270? [Condition B.40] Yes X No__ N/A ___ RMK#
2. Does the permittee comply with the notification and certification requirements of OAC rule 3745-270-07(A)? Yes X No__ N/A ___ RMK#
3. Does the permittee comply with the requirements of OAC rule 3745-270-03 and does not in any way dilute a restricted waste or treatment residue as a substitute for adequate treatment? Yes X No__ N/A ___ RMK#
4. Does the permittee retain supporting data used to determine if wastes managed at the facility are restricted from land disposal in the facility files as required by OAC rule 3745-270-07(A)(5)?
 - a. Are copies of all notices, certifications, demonstrations, waste analysis and other documentation produced pursuant to OAC Chapter 3745-270 retained for a period of three years as required by OAC rule 3745-270-07(A)? Yes X No__ N/A ___ RMK#
5. Is the permittee in compliance with the requirements of OAC rule 3745-270-50 regarding the storage of wastes restricted or prohibited from land disposal under OAC rule 3745-270-50? Yes X No__ N/A ___ RMK#

REMARKS

CORRECTIVE ACTION

1. Has the permittee submitted the monthly progress report for all corrective action activities? (This report is due by the 15th of the month following the reporting period.) Yes__ No__ N/A X RMK#
2. Has the permittee identified any new WMUs or releases at the facility? [Condition E.10]? If so:
 - a. Did the permittee follow the steps indicated in Conditions E.10 and E.11? Yes__ No__ N/A X RMK#

REMARKS

G:\BPC-CheckSheets\BPC-TSD05-2003.wpd

**LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

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

Safety Equipment Used:

GENERAL REQUIREMENTS

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

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

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).

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

NOTE: Complete appropriate checklist for each unit.

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

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

e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
MANIFEST REQUIREMENTS		
12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]		
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]		
15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.		
17.	If the generator received a rejected load or residue, did the generator:	
a.	Sign item 20 of the new manifest or item 18c of the original manifest? [3745-52-23(F)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Provide the transporter a copy of the manifest? [3745-52-23(F)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Send a copy of the manifest to the designated facility that returned the shipment with 30 days after delivery of the rejected shipment? [3745-52-23(F)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: A generator who sends a shipment of hazardous waste to a TSD facility with the understanding that the TSD facility can accept and manage the waste and later receives that shipment back as a rejected load or residue may accumulate the waste on-site for <90 days or <180 days depending on the amount of hazardous waste on-site in that calendar month. [3745-52-34(M)]		
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.		
PERSONNEL TRAINING		
21.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]

23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
25.	Does the generator provide refresher training to employees during each period from January 1 st to December 31 st and does each training occur within 15 months after the previous training? [3745-65-16(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
26.	Does the generator keep records and documentation of:	
	a. Job titles? [3745-65-16(D)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Job descriptions? [3745-65-16(D)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. Completed training or job experience required? [3745-65-16(D)(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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

Job Performed	Name of Employee	Date Trained

CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	Does the plan describe the following:	
	a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e. An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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

EMERGENCY PROCEDURES

33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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

PREPAREDNESS AND PREVENTION

34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:	
a.	Internal communications or alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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

36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
39.	If there is only one employee on the premises, is there immediate access to a device (eg. phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

SATELLITE ACCUMULATION AREA REQUIREMENTS

43.	Does the generator ensure that satellite accumulation area(s):		
a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
<p><i>NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.</i></p>			
USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS			
45.	Has the generator marked containers with the words "Hazardous Waste"? [3745-52-34(A)(3)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
46.	Is the accumulation date on each container? [3745-52-34(A)(2)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
47.	Are hazardous wastes stored in containers which are:		
a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
b.	In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
<p><i>NOTE: Record location on process summary sheets, photograph the area, and record on facility map.</i></p>			
48.	Is the container accumulation areas(s) inspected at least once during the period from Sunday to Saturday? [3745-66-74]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.		
53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]		
PRE-TRANSPORT REQUIREMENTS		
54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Continue with the generator LDR requirements on the next page.		

GENERATOR LDR REQUIREMENTS

NOTE: This LDR checklist does not include the requirements for generators that treat to meet LDR standards. If the generator treats, the inspector should use the stand-alone Generator LDR checklist instead of this checklist.

GENERAL REQUIREMENTS

1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07(A)(7)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not,	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: This is done by determining if the HW/soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).

3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.

6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.

NOTE: Written documentation of this determination is not required.

7.	Did the generator treat his HW /soil on-site <u>to meet</u> the LDR treatment standard?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: If "Yes" see question #16.

8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
i.	Applicable HW codes?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
ii.	Manifest number of the first shipment to the TSD?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
iii.	A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination.?"	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	Does the generator have a copy of the LDR notification form/notice on file?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

[3745-270-07(A)(2)]		
a.	Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTIFICATION FORM		
11.	Does the LDR Notification form contain the following information:	
a.	Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: A wastewater contains <1% by wt. total suspended solids (TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.		
e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories		
f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.		
g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.		
PROHIBITED DILUTION		
12.	Is the HW treated by burning? If "No" go to #15.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Is the HW a metal-bearing HW?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs is given in the Appendix to 3745-270-03.		
14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless <u>one</u> of the following conditions apply. [3745-270-03(c)]
	i.	Contains > 1% TOC? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	ii.	Contains organic constituents or cyanide at levels greater than the UTS levels? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iii.	Is made up of combustible material e.g., paper, wood, plastic? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iv.	Has a reasonable heating value (e.g., > 5000 Btu)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	v.	Co-generated with a HW that must be combusted? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Was the HW treated by wastewater treatment? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	

	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: If "Yes", HW is improperly being treated by dilution.</i>			
	b.	Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].</i>			
<i>NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.</i>			

**USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

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

2. Inspectors can check BUSTR's web-site at https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at:

https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp.

PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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

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

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

GENERATOR STANDARDS

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

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

5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

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

ON-SITE BURNING IN SPACE HEATER		
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).</i>		
GENERATOR TRANSPORTATION		
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).</i>		
COLLECTION CENTERS AND AGGREGATION POINTS		
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.</i>		

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

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

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

PROHIBITIONS

- | | | |
|----|---|--|
| 1. | Did the SQUWH dispose of universal waste? [3745-273-11(A)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 2. | Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES

- | | | |
|----|--|--|
| 3. | Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 4. | If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| 5. | Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 6. | If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| a. | If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| b. | If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |
| 7. | Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

UNIVERSAL WASTE LAMPS

- | | | |
|----|---|--|
| 8. | Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
| 9. | Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.

- | | | |
|-----|--|--|
| 10. | Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)] | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> |
|-----|--|--|

ACCUMULATION TIME

- | | | |
|-----|---|--|
| 11. | Is the waste accumulated for less than one year? [3745-273-15(A)] | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| a. | If not, is the waste accumulated over one year in order to facilitate | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> |

Ineos USA LLC, June 11, 2012

OHD042157644

RCRA SMALL QUANTITY UNIVERSAL WASTE HANDLER - BATTERIES & LAMPS INSPECTION CHECKLIST

SQUWH-B&L/May 2012

	proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	
<i>NOTE: Accumulation is defined as date generated or date received from another handler.</i>		
12.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below: Accumulation date and recycling receipts	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
EMPLOYEE TRAINING		
13.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RESPONSE TO RELEASES		
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
16.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
OFF-SITE SHIPMENTS		
<i>NOTE: If a SQUWH self-transportes waste, then the handler must comply with the Universal Waste transporter requirements.</i>		
17.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
21.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u> :	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
22.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
EXPORTS		
<i>NOTE: Small quantity handlers that export waste to the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262 subpart H. Small quantity handlers that export waste to a foreign destination other than the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262.53, 40 CFR 262.56(a)(1) to (a)(4), (a)(6), and (b), 40 CFR 262.57, and 40 CFR 262 subpart E. [3745-273-20]</i>		

Ineos USA LLC, June 11, 2012
OHD042157644

RCRA SMALL QUANTITY UNIVERSAL WASTE HANDLER - BATTERIES & LAMPS INSPECTION CHECKLIST
SQUWH-B&L/May 2012

NOTE: Violations regarding exporting universal waste to foreign destinations should be referred to U.S. EPA Region 5 because the federal counterpart provisions are not delegable to states.