OhioEPA

State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: ESOI Otter Creek Road Facility
OHD 045 243 706
RCRA Hazardous Waste
Lucas County
Compliance Evaluation Inspection
Notice of Violation & Partial RTC

October 5, 2007

Mr. Kenneth Humphrey
Environmental Director
Envirosafe Services of Ohio, Inc.
876 Otter Creek Road
Oregon, Ohio 43616-1200

Dear Mr. Humphrey:

From May 29, 2007, through June 5, 2007, Gary Deutschman, Mary Ann Miller and I inspected Envirosafe Services of Ohio, Inc.'s (ESOI's) hazardous waste treatment, storage and disposal facility (TSDF) located at 876 Otter Creek Road in Oregon, Ohio. ESOI was represented by Mr. Robert Morris, Mr. Herb Snider, Mr. Donald Steyer and you during various portions of the inspection. The Ohio Environmental Protection Agency (Ohio EPA) conducted this inspection to determine ESOI's 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), ESOI's approved December 29, 2005 Ohio Hazardous Waste Facility Installation and Operation Permit (permit) and the April 24, 2000 Director's Consent Order and Final Judgment. Our inspection included an observation of facility operations and a review of written documentation.

On June 12, 2007, you were verbally notified of the following violations of the facility's hazardous waste permit and/or Ohio's hazardous waste laws that were found during this inspection:

1. **Permit Conditions C.6(h) and C.8(e); OAC Rule 3745-270-50(A)(2)(a)**

   Permit Condition C.6(h) states, "After each shipment of hazardous waste is received and has been placed into storage, the Permittee must label containers storing hazardous waste with the following information: (i) waste type and description; (ii) date waste was received into the storage area; (iii) Permittee load number and/or container sequence number (for on-site generated waste); (iv) generator name; and, (v) Waste Stream Identification Number (WSID)."

   Permit Condition C.8(e) states in part, "The Permittee must label all railroad cars arriving at the facility" so that each container is clearly marked to identify its contents and the date each period of accumulation begins.

   During the inspection conducted on May 29, 2007, Ohio EPA noted that rail car NAHX 455535 located in Area N was not labeled.

This violation is considered abated as it is historical and subsequent inspections of railcars in Areas N and M (from June 8, 2007 to present) have shown all railcars to be properly labeled by ESOI.

2. **Permit Condition F.5(a)(ii); OAC Rule 3745-205-101(C)(1)(b)**

Permit Condition F.5(a)(ii) states, "The Permittee must use controls and practices to ensure containment of the hazardous waste within the Stabilization/Containment Building; and, at a minimum: Maintain the level of the stored/treated hazardous waste within the containment walls of the Stabilization/Containment Building so that the height of any containment wall is not exceeded."

During the inspection conducted on May 29, 2007, Ohio EPA found a waste pile in Sort Floor Area #1 that exceeded the sidewall wall height. ESOI's inspection records (Daily Form MF-02b) for the sort floor areas from May 25, 2007, and May 29, 2007, indicated that the waste height did not exceed the sidewalls.

This violation is considered abated since ESOI spread the waste out within Sort Floor Area #1 so that it no longer exceeded the height of the sidewalls. ESOI must continue to follow its past practice to keep the waste height below the sidewalls in the Sort Floor Areas or submit a permit modification in accordance with OAC Rule 3745-50-51 to revise this permit condition.

3. **Permit Condition C.9(d) and OAC Rules 3745-54-15(D) and 3745-54-73(B)(2)**

Permit Condition C.9(d) states that "All railroad cars must be inspected by trained personnel prior to entering and/or exiting the facility, and in accordance with OAC Rule 3745-55-74."

During the inspection, Ohio EPA noted 13 separate instances over the months of January, February, March and May 2007 where Inbound and Outbound Rail Car Inspection Forms MF-16(a) and (b) were incorrectly completed as follows:

- Dates and days of the week on specific forms do not match up.
- Railcars arrive/leave the facility without any record of these movements appearing on the appropriate inspection form(s).
- Railcars appear on outbound forms before they arrive on site on an inbound form (ACFX 47049 on 03/14/07 MF-16(a)).
- Some forms appear to be missing completely (03/09/07 MF-16(b)).
- Some forms are not completed (03/06/07 MF-16(b)).
- Cars appear to arrive on one form and then leave on two separate dates/forms (ACFX 49741 leaves on 01/19/07 and 01/22/07).

To abate this violation, ESOI must immediately implement the use of the new MF-16(a) and MF-16(b) form (now a one-page, front/back format) that ESOI presented during the second exit interview on June 18, 2007. ESOI must also provide documentation that the supervisors responsible for completing these new forms have received training on how to complete these forms and ESOI must submit a permit modification in accordance with OAC Rule 3745-50-51 to incorporate these revised forms MF-16(a) and MF-16(b) into the permit application.

4. **Permit Condition F.5(a)(iii), OAC Rule 3745-205-101(C)(1), and the April 24, 2000, Attorney General's Consent Order and Final Judgment**

Permit condition F.5(a)(iii), OAC Rule 3745-205-101(C)(1)(c) and Section V, Paragraph 5 of the Attorney General's Consent Order and Final Judgment dated April 24, 2000, state that the Permittee must take measures to prevent the tracking of hazardous waste out of the Stabilization/ Containment Building (SCB) by personnel or equipment.

During the inspection conducted on June 1, 2007, Ohio EPA noted waste tracking on the apron outside of SCB door #138. In addition, waste tracking was observed by Ohio EPA on the apron outside SCB door #138 on June 4, 2007, and June 5, 2007.

This violation is considered abated since ESOI removed the waste from the apron outside SCB door #138 on June 5, 2007, and Ohio EPA has not noted any waste tracking issues at SCB door #138 since the CEI.

5. **Permit Condition F.5(a)(iii)(a), OAC Rule 3745-205-101(C), and the April 24, 2000, Attorney General's Consent Order and Final Judgment**

Permit condition F.5(a)(iii)(a) and Section V, Paragraph 5 of the Attorney General's Consent Order and Final Judgment dated April 24, 2000 state that the Permittee must inspect the SCB entrance apron within fifteen minutes after a hazardous waste transportation vehicle leaves the SCB and remove all tracked or fallen waste at the time of inspection. By the end of each day's use, the containment pads around the SCB must be inspected and all tracked or fallen waste must be removed at the time of inspection.

During the inspections conducted on June 1st, June 4th, June 5th, June 12th and June 13th, 2007 Ohio EPA noted that ESOI failed to properly inspect and clean the apron at SCB door #138 and the containment pad at SCB door #121 at the following times:

Date & Time	Violation
06/01/07 14:13	Moxy Truck to Cell M @ 13:58 - Failure to inspect the SCB apron at door #138 within 15 minutes
06/01/07 14:13	Failure to remove tracked or fallen waste from SCB apron at door #138
06/01/07 14:29	Moxy Truck to Cell M @ 14:14 -Failure to inspect the SCB apron at door #138 within 15 minutes
06/01/07 14:29	Failure to remove tracked or fallen waste from SCB apron at door #138

Date & Time	Violation
06/04/07 10:32	Moxy Truck to Cell M @ 10:17 - Failure to inspect the SCB apron at door #138 within 15 minutes
06/04/07 10:32	Failure to remove tracked or fallen waste from SCB apron at door #138
06/04/07 10:47	Moxy Truck to Cell M @ 10:32 - Failure to remove tracked or fallen waste from SCB apron at door #138
06/05/07 10:32	Moxy Truck to Cell M @ 10:17 - Failure to inspect the SCB apron at door #138 within 15 minutes
06/05/07 10:32	Failure to remove tracked or fallen waste from SCB apron at door #138
06/05/07 10:57	Moxy Truck to Cell M @ 10:42 - Failure to inspect the SCB apron at door #138 within 15 minutes
06/05/07 10:57	Failure to remove tracked or fallen waste from SCB apron at door #138
06/13/07 15:00	Failure to remove tracked or fallen waste from containment pad outside door #121 from 6/12/07 shipment

This violation is considered abated since ESOI conducted training on these issues with the entire SCB staff on June 14, 2007 and Ohio EPA has not noted any waste tracking issues at the SCB door aprons or containment pads since the CEI.

6. **Permit Condition F.5(a)(iii)(b), OAC Rule 3745-205-101(C), and the April 24, 2000 Attorney General's Consent Order and Final Judgment**

Permit condition F.5(a)(iii)(b) and Section V, Paragraph 5 of the Attorney General's Consent Order and Final Judgment dated April 24, 2000 state that the Permittee must maintain a log that records the inspection of and any actions taken at the entrance aprons and containment pads of the SCB.

During the inspection, upon reviewing ESOI's Stabilization Plant Door Inspection Logs, Ohio EPA noted that ESOI failed to maintain and accurately complete these logs for SCB doors #201 and #138.

ESOI did not maintain any logs for SCB door #201.

ESOI did not accurately complete the logs for SCB door #138, as noted when Ohio EPA compared its observations for the activities at this door on 6/1, 6/4 and 6/5/07 with ESOI's inspection logs.

- ESOI failed to accurately identify traffic patterns at SCB Door #138
- ESOI failed to accurately note the occurrences of inspections and cleaning activities at SCB Door #138

This violation is considered abated since ESOI conducted training on these issues with the entire SCB staff on June 14, 2007 and Ohio EPA has noted that ESOI has created and posted a Stabilization Plant Door Inspection Log at Door #201.

7. **Permit Condition J.2(a); OAC Rule 3745-57-03**

Permit Condition J.2(a) states that ESOI must construct Cell M in accordance with the plans and drawings contained in Section D of the permit application, terms and conditions of this permit, and the Ohio hazardous waste rules.

ESOI failed to maintain the cover of Cell M in accordance with the specifications of Section D-4, Appendix D.6 (Sections 4, 5 and 9), and Appendix D.31 of ESOI's permit application.

During the inspection, Ohio EPA noted the following deficiencies in ESOI's maintenance of the final cover on Phase 1 of Cell M.

- Erosion fissures in the 3:1 portion of the side slope at subcell M1 and along the west side of Phase 1 near the Leachate Storage Tank Building.
- Riprap between the M1 and M2 risers washed out into the surface water drainage ditch.
- Lack of erosion control vegetation on Phase 1.

Ohio EPA also noted that the side slopes of the remainder of Cell M did not meet the specifications described in Appendix D.6 (Sections 4, 5 and 9) of ESOI's Part B Permit Application.

During June and July 2007, ESOI abated this violation by replacing the Riprap erosion control between the M1 and M2 risers, repairing the effects of erosion on the side slopes of Phase 1, seeding Phase 1, and by taking steps to repair and maintain the remainder of Cell M per Appendix D.6 (Sections 4, 5 and 9) of the Part B Permit Application.

8. **Permit Condition L.3; OAC Rule 3745-57-03(H)**

Permit Condition L.3 states that ESOI must follow the surface water management plan for the entire ESOI facility found in the approved Part B application.

During the inspection, Ohio EPA noted that the surface water drainage ditches and storm water culverts around Cell M were filling with sediment. Surface water was ponding in these ditches and sediment was building up around the culverts due, in part, to the lack of vegetation on the side slopes of the cell. The condition of the surface water drainage ditches and culverts did not meet the specifications described in Appendix D.24 of ESOI's Part B Permit Application.

During June and July 2007, ESOI abated this violation by removing the accumulated sediment from the surface water drainage ditches and around the storm water culverts. ESOI also committed to seeding the remainder of Cell M with temporary vegetative cover to help reduce erosion on Cell M during the fall of 2007.

ESOI must continue to maintain the surface water ditches and culverts so that they function per their design as described in ESOI's Part B Permit Application.

9. **OAC Rule 3745-279-22(C)(1)**

OAC Rule 3745-279-22(C)(1) states containers and aboveground tanks used to store used oil must be labeled or marked clearly with the words "Used Oil."

During the inspection conducted on May 29, 2007, Ohio EPA observed two unlabeled drip pans and an unlabeled reservoir tank containing used oil in Building C.

As of June 14, 2007, ESOI abated this violation by labeling all drip pans and the reservoir tank with the words "Used Oil."

In addition to the above violations, the following areas of concern were also noted during the inspection:

1. OAC Rule 3745-273-14(A) states universal waste batteries (i.e., each battery), or a container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste – Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)."

   OAC Rule 3745-273-15(C) states a small quantity handler of universal waste who accumulates universal waste shall be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

   During the inspection conducted on May 29, 2007, Ohio EPA noted that ESOI has failed to label any of the lead acid batteries being accumulated in Building C (this was also noted during the December 2006 CEI). Ohio EPA observed eight (8) batteries in the battery storage room in Building C. None of these batteries were being charged at the time of the inspection and none were labeled as universal waste.

   During the exit interview, ESOI indicated that all of these batteries are still in use and being charged.

   On June 14, 2007, Ohio EPA noted that ESOI had labeled all eight batteries as "charging." Ohio EPA expects that batteries that ESOI can no longer recharge will be labeled appropriately by ESOI per OAC Rule 3745-273-14(A) and dated per OAC Rule 3745-273-15(C).

2. During the inspection, Ohio EPA noted contaminated PPE (cloth and nitrile gloves) in Areas M, N and K.

   OAC Rule 3745-52-34 states that a generator may, for ninety days or less, accumulate hazardous waste, provided that the waste is placed in containers and the generator complies with the applicable requirements in OAC Rules 3745-66-70 to 3745-66-77.

ESOI should ensure that waste generated on-site is containerized properly at the time and near the point that it is generated.

3. During inspections, Ohio EPA has observed what appears to be leachate leaking from the loading hose at the Leachate Storage Tank Building. Ohio EPA has observed wet spots on the base of the loading bay and seen the line dripping after tanker loading activities at the loading bay.

   OAC Rule 3745-52-34 states that a generator may, for ninety days or less, accumulate hazardous waste, provided that the waste is placed in containers and the generator complies with the applicable requirements in OAC Rules 3745-66-70 to 3745-66-77.

   ESOI should ensure that waste generated on-site is collected and containerized properly at the time and near the point that it is generated.

4. Permit Condition F.5(a)(iii), OAC Rule 3745-205-101(C), and the April 24, 2000 Attorney General's Consent Order and Final Judgment state that the Permittee must ensure containment of the hazardous waste within the Stabilization/Containment Building (SCB); and, at a minimum, take measures to prevent the tracking of hazardous waste out of the building.

   During the inspection conducted on June 1, 2007, Ohio EPA noted what appeared to be tire tracks on the pad outside Door #119.

   Ohio EPA has noted that ESOI believes the tire tracks to be mud left from a fuel truck that backed up to Door #119 to fuel the excavator(s) used at the campaign bin and not K061 waste.

   ESOI should make a better effort to inspect, clean and document the removal of tire tracks (either mud or waste) from the containment pads, aprons and ramps located at the SCB.

5. Permit Condition B.5(a) states in part that the Permittee must require inspectors to mark items not inspected as "NI" on the checklist.

   During the inspection, Ohio EPA noted that the checklist on Forms MF-17c (Wastewater Storage Tank Inspection Form – Daily) and MF-05 (Scale Area Inspection Form) were not properly completed for the following dates:

   Form MF-17c

   - February 8, 2007 (Items 1 – 15 left blank)
   - March 23, 2007 (Item 16 left blank)
   - April 16, 2007 (Items 1 – 15 left blank)
   - May 14, 2007 (Item 16 left blank)

   Form MF-05

   - April 25, 2007 (Item 9C left blank)
   - May 2, 2007 (Item 9F left blank)
   - May 23, 2007 (Item 9F left blank)

   ESOI should take steps to ensure that the inspection checklists described in Section F of the permit application are complete and accurate.

6. Permit Condition B.9(a) states "At a minimum, the Permittee must maintain at the facility all the equipment required by OAC Rule 3745-54-32 and the equipment set forth in the contingency plan contained in Section G of the permit application."

   Permit Condition B.9(a)(i) states "Each permanent building at the facility (lab trailers, office, storage buildings, process plant) must be equipped with a minimum of one or more of the following communication devices: telephone, two-way radio, paging system and/or alarm system."

   As noted in the May 2006 CEI inspection, Ohio EPA observed that telephones located in the Leachate Storage Tank Building were inoperable. During the December 2006 CEI inspection, Ohio EPA observed that the inoperable telephones had been removed. Ohio EPA has noted that facility employees carry two-way radios whenever on-site.

   ESOI should, as soon as possible, submit a permit modification in accordance with OAC Rule 3745-50-51 to revise this permit condition or ESOI should replace the inoperable telephones in the Leachate Storage Building.

7. Permit Condition B.24(a) states "In managing waste at the facility the Permittee must comply with OAC Chapter 3745-52 and OAC Rules 3745-54-71, 3745-54-72 and 3745-54-76 with regard to the manifest system."

   During the inspection, Ohio EPA noted that ESOI received two shipments of waste from an off-site generator on January 11, 2007, which contained weight discrepancies of greater than 10%. ESOI failed to document these weight discrepancies in Section 18a (Discrepancy Indication Space) of the manifest and failed to enter the corrected actual quantity shipped/received in Section 11 (Total Quantity) of the manifest. Instead, ESOI marked the manifest in Section 14 (Special Handling Instructions and Additional Information) to indicate that the generators accepted ESOI's scale weight.

   ESOI should correct and document weight discrepancies in the appropriate sections of the Universal Hazardous Waste Manifest.

8. Permit Condition I.2(d)(i) states that the Permittee must maintain the integrity and effectiveness of the final cover, including making repairs to the cap, as necessary, to correct the effects of settling, subsidence, erosion or other events.

   During the inspection, Ohio EPA observed rodent holes on two of the closed cells (two on the top tier of Cell I, near the northwest corner; and two on the north side of the top tier of Cell H, near the surface water impoundment). ESOI filled all four of these holes with bentonite on May 29, 2007.

   ESOI hires a trapper to remove rodents from the property and ESOI has filled in the holes several times a year. Ohio EPA recommends that ESOI document the location of any observed holes, the date the holes were observed and filled, the dates that the trapper is on-site and the date and number of rodents captured in the facility operating record to demonstrate that the facility is actively monitoring, minimizing and repairing holes in the closed cell caps.

9. Permit Condition I.2(d)(v)(a) states that the Permittee must remove and replace dead or damaged vegetation.

   During the inspection, Ohio EPA noted two areas of distressed and/or dead vegetation previously reported to ESOI during the December 2006 CEI have not yet been replaced. One is located on the southeast corner of the north sanitary landfill and the other is on the southeast corner of the central sanitary landfill. ESOI should address these areas when the weather supports the germination and growth of vegetative materials.

10. Permit Condition G.1(a) states that the Permittee must continue to be party to the Waterline Security Agreement with the City of Toledo as found in Appendix B.2 of the permit application.

    During the inspection, Ohio EPA observed multiple trucks parking on top of the waterlines in the paved area near the main offices/scales.

    ESOI should enforce this parking ban and repost the no parking/stopping signs and repaint the paved area over the waterline easement to better delineate this area.

11. Permit Condition B.4(c) states in part that the Permittee must provide a fence which surrounds the facility and must be at least a six-foot chain link fence topped with three strands of barbed wire.

    During the inspection, Ohio EPA observed that the barbed wire was missing on a section of the fence line north of the North Sanitary Landfill (SWMU #6) near well PB-11. ESOI replaced the barbed wire on May 29, 2007.

    Ohio EPA recommends ESOI document the location of any observed defects in the facility fence line and the date the defects were observed and repaired in the facility operating record to demonstrate that ESOI is actively monitoring and maintaining the perimeter fence line.

12. Ponding remains an issue on the new oil pond (SWMU 9). ESOI should be addressing this issue during corrective action.

13. Oil appears to be leaking out of the new oil pond (SWMU 9) around the vent pipes located on top of the unit and at the newly installed vent pipes located on the east side of the unit. ESOI should be addressing this issue during corrective action.

14. During the inspection, Ohio EPA observed roll-off boxes (S30160, S30124 and S30151) of Ferrous stored in Area O that were leaking. Liquids that were observed collecting underneath these boxes were tested with pH paper and shown to have a pH of less than 2.0. ESOI should take steps to prevent these boxes from leaking this corrosive ferrous sulfate solution while in storage.

ESOI has satisfactorily abated violations #1, 2, 4, 5, 6, 7, 8 and 9 as outlined in this NOV.

ESOI should respond to this letter within fourteen (14) days of receipt. Your response should include proposed remedies and/or timelines for rectifying the above violations. ESOI is also expected to address the above concerns in a timely manner. Failure to rectify the aforementioned concerns could result in future violations.

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)698-3130.

You can find copies of the rules and other information on the division's web page at http://www.epa.state.oh.us/dhwm. Ohio EPA also has helpful information about pollution prevention at the following web address: http://www.epa.state.oh.us/ocapp/ocapp.html.

Sincerely,

Chris Maslo

Chris Maslo
Environmental Specialist II
Division of Hazardous Waste Management

/cs

Enclosure

pc (w/enc): Oregon Document Depository
Tammy McConnell, DHWM, IT&TSS, CO
DHWM, NWDO File – ESOI Document Library

pc (w/o enc): Mayor Marge Brown, City of Oregon
Jack McManus, AGO
Paul Little, U.S. EPA, Region V
Harry Sarvis, DHWM, CO
Cindy Lohrbach, DHWM, NWDO

ec: Shannon Nabors, District Chief
Jeremy Carroll, DHWM, CO
Harry Sarvis, DHWM, CO
Ike Wilder, DHWM, CO
Gary Deutschman, DHWM, NWDO
Michael Terpinski, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
Chris Maslo, DHWM, NWDO

NOTE: 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.

OHIO PART B PERMITTED FACILITY SEMI-ANNUAL RCRA COMPLIANCE EVALUATION INSPECTION CHECKLIST

Company: Envirosafe Services of Ohio, Incorporated U.S. EPA ID #: OHD 045 243 706

Street: 876 Otter Creek Road Ohio Permit #: 03-48-0092

City: Oregon State: OH Zip: 43616-1200

Inspection Date(s): 5/29/07 - 6/1/07, 6/4/07, and 6/5/07

Inspection Time(s): 0800 - 1700, except 5/31/07 (0800 - 1830) and 6/5/07 (1000 - 1400)

Inspection Announced? ___ Yes __X__ No If yes, how much advanced notice given_____

	Name	Affiliation	Telephone
Inspector(s):	Chris Maslo	Ohio EPA	(419) 698-3130
	Gary Deutschman	Ohio EPA	(419) 352-8461
	Mary Ann Miller	Ohio EPA	(419) 547-6033
Facility Representative(s):	Ken Humphrey	ESOI	(419) 698-3500 ext. 246
	Donald Steyer	ESOI	(419) 698-3500 ext. 415
	Robert Morris	ESOI	(419) 698-3500 ext. 440
	Lisa Humphrey	ESOI	(419) 698-3500 ext.226

Is the facility operating as a generator? __X__ Yes ____ No

Are Land Disposal Restricted wastes managed? __X__ Yes ____ No

PERMIT STATUS

Permit Issued: December 29, 2005
Permit Effective: December 29, 2005
Permit Expiration: December 29, 2015

ADDITIONAL CHECKLISTS COMPLETED

Land Disposal Restrictions (LDR)
Tanks
Used Oil (Short Form)
Large Quantity Generator (LQG)
Pollution Prevention (P2)
Universal Waste

STORAGE		TREATMENT		DISPOSAL	
X	Container		Tank		Injection Well
X	Tank		Surface Impoundment	X	Landfill
	Waste Pile		Incinerator		Land Application
	Surface Impoundment		Thermal Treatment		Surface Impoundment
		X	Chem. Stab. in Containers		
		X	Chem. Stab. in Containers		

Ohio Environmental Protection Agency

RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM

For Ohio EPA use only

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

2. Site EPA ID No.	**EPA ID Number: OHD 045 243 706**							
3. Site Name	**Name: Envirosafe Services of Ohio, Inc.**				**Website: www.envirosafeservices.com (Optional)**			
4. Site Location Information	**Street Address: 876 Otter Creek Road**							
	City, Town, or Village: Oregon				**State: OH**			
	County Name: Lucas				**Zip Code: 43616-3518**			
5. Site Land Type (check only one)	**Private** ☒	**County** ☐	**District** ☐	**Federal** ☐	**Indian** ☐	**Municipal** ☐	**State** ☐	**Other** ☐
6. NAICS code(s) www.census.gov/epcd/www/naics.html								
7. Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address	**First Name: Kenneth**		**MI: L**		**Last Name: Humphrey**			
	Phone Number: (419) 698 3500				**Phone Number Extension: 246**			
	E-Mail Address: k.humphrey@envirosafeservices.com							
	Fax Number: (419) 698 8663				**Fax Number Extension:**			
	Street or P.O. Box:							
	City, Town or Village:							
	State:			**Country:**		**Zip Code:**		
8. 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:**				**Date Became Owner (mm/dd/yyyy):**			
	Owner Type:	**Private** ☐	**County** ☐	**District** ☐	**Federal** ☐	**Indian** ☐	**Municipal** ☐	**State** ☐	**Other** ☐
	Street or P.O. Box:							
	City, Town or Village:				**Owner Phone #:**			
	State:				**Country:**		**Zip Code:**	
	Name of Site's Operator:				**Date Became Operator (mm/dd/yyyy):**			
	Owner Type:	**Private** ☐	**County** ☐	**District** ☐	**Federal** ☐	**Indian** ☐	**Municipal** ☐	**State** ☐	**Other** ☐
	Street or P.O. Box:							
	City, Town or Village:				**Operator Phone #:**			
	State:				**Country:**		**Zip Code:**	
9. Violations Cited?	☒ **Yes** ☐ **No**							

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

☐ **Not Regulated**	☐ **Conditionally Exempt Small Quantity Generator**
☐ **UNKNOWN**: Cited for violation of 3745-52-11	☐ **United States Importer of Hazardous Waste**
☒ **Large Quantity Generator (LQG)**	☐ **Mixed Waste (Hazardous and Radioactive) Generator**
☐ **Small Quantity Generator (SQG)**	
☐ **Hazardous Waste Transporter**	☐ **Exempt Boiler and/or Industrial Furnace**
☒ **Treater, Storer or Disposer of Hazardous Waste**	☐ **Small Quantity On-Site Burner Exemption**
☐ **Recycler of Hazardous Waste**	☐ **Smelting, Melting, Refining Furnace Exemption**
☐ **Underground Injection Control Facility**	

10B. Universal Waste Activities (Indicate types of universal waste managed (check all boxes that apply)

☒ **Small Quantity Handler of Universal Waste**	☐ **Large Quantity Handler of Universal Waste** (accumulates 5,0[illegible] or more)
☐ **Destination Facility for Universal Waste**	

Check all boxes below that apply for each of the three types of facilities above	Managed	10C. Used Oil Activities (Indicate Type(s) of Activity(ies)	
		☒ **Used Oil Generator**	☐ **Off-Specification Used Oil Burner**
Batteries	☒	☐ **Used Oil Transporter**	☐ **Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil**
Pesticides	☐	☒ **Used Oil Transfer Facility**	☐ **Used Oil Fuel Marketer to Off-Specification Used Oil Burner**
Mercury containing equipment	☐	☐ **Used Oil Processor**	
Lamps	☐	☐ **Used Oil Re-refiner**	

11. 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 if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

12. 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:**	**Don Steyer, VP of Operations; Lisa Humphrey, Customer Service Manager; and, Bob Morris, Personnel/Safety Training Manager.**
Tanks	☒ **Yes**	☐ **No**	**Other Comments:**	
Containers	☒ **Yes**	☐ **No**		

13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Chris Maslo, Gary Deutschman, Mary Ann Miller		**5/29/07 5/30/07, 6/1/07, 6/4/07 (0800 1700), 5/31/07 (0800 1830), 6/5/06 (1000 1400)**

14. OPTIONAL CERTIFICATION. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Owner, Operator, or an Authorized Representative	Name and Title (Print)	Date (mm/dd/yyyy)

Table of Contents

ACRONYMS

CEI	Compliance Evaluation Inspection *
CFR	Code of Federal Regulations
CME	Compliance Monitoring Evaluation *
DOT	Department of Transportation
DERR	Division of Emergency and Remedial Response
DHWM	Division of Hazardous Waste Management
EAF Dust	Electric Arc Furnace Dust (K061)
ESOI	Envirosafe Services of Ohio, Inc.
FRR	Financial Record Review *
HDPE	High Density Polyethylene
HWFB	Hazardous Waste Facility Board
LDPE	Low Density Polyethylene
LDR	Land Disposal Restriction
NFPA	National Fire Prevention Association
NRC	Nuclear Regulatory Commission
NRR	Non-Financial Record Review *
OAC	Ohio Administrative Code
Ohio EPA	Ohio Environmental Protection Agency
O&M	Operation and Maintenance Inspection *
O/O	Owner/Operator
ORC	Ohio Revised Code
OTH	Other Inspection *
P2	Pollution Prevention
PC	Permit Condition
PE	Professional Engineer
PLCS	Primary Leachate Collection System
PPE	Proper Protective Equipment
QA/QC	Quality Assurance/Quality Control
QAP	Quality Assurance Plan
RAP	Response Action Plan
RCRA	Resource Conservation and Recovery Act
SCB	Stabilization/Containment Building
SLCS	Secondary Leachate Collection System
SOP	Standard Operating Procedure
SWMP	Surface Water Management Plan
TCLP	Toxicity Characteristic Leaching Procedure
TESD	Toledo Environmental Services Division
TSCA	Toxic Substances Control Act
TSD(F)	Treatment Storage and Disposal (Facility)
U.S. DOT	United States Department of Transportation
U.S. EPA	United States Environmental Protection Agency
UTS	Universal Treatment Standards
WAP	Waste Analysis Plan
WPR	Waste Product Review
WPQ	Waste Profile Questionnaire
WSID	Waste Stream Identification

* Regulatory/Enforcement History Table

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Envirosafe Services of Ohio, Inc. (ESOI) **Facility Type:** LQG/TSD **EPA ID#:** OHD 045 243 706

	Description of Waste				*On-Site Management*			*Off-Site Management*	
	Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	**Waste Generated** (e.g. sludge, spent solvent, ash, etc)	**EPA Waste Code**	**QTY Generated per Month**	Type of Accumulation/ Storage (e.g. container, tank, etc)	Type of On-Site Treatment (recycle, wwt, etc)	**Waste Location** (Include map if possible)	**Name, state, and type of activity occurring at the facility.**	**P2 Activity**
1	Waste Landfilling	Multi-Source Landfill Leachate	F039	637,792 G	Tank	None	One of four 25,000-gal tanks contained in a building located west of the cell M landfill and south of York Street.	EQ-Detroit, Inc., MI; TSDF; Vickery Environmental, OH; TSDF	None
2	Annual Leachate storage tank clean out.	Leachate storage tank sludge	F039 K061	3,920 P	Tank	Stabilization	25,000-gal tank contained in a building located west of the cell M landfill and south of York Street;	25,000 gal tanks contained in the leachate storage tank building, west of the Cell M landfill and south of York Street	None

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Envirosafe Services of Ohio, Inc. (ESOI) **Facility Type:** LQG/TSD **EPA ID#:** OHD 045 243 706

	Description of Waste				*On-Site Management*			*Off-Site Management*	
	Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	**Waste Generated** (e.g. sludge, spent solvent, ash, etc)	**EPA Waste Code**	**QTY Generated per Month**	Type of Accumulation/ Storage (e.g. container, tank, etc)	Type of On-Site Treatment (recycle, wwt, etc)	**Waste Location** (Include map if possible)	**Name, state, and type of activity occurring at the facility.**	**P2 Activity**
3	Lab analysis of treated and approved waste streams.	Excess sample and contaminated materials from testing.	D002-D011; D035; D040; F001-F009; F011; F012; F019; F038; F039; K061; K062; K142; U134.	1,815 P	5-gallon buckets	Direct Disposal	ESOI's on-site laboratory located adjacent to the scale trailer at the facility entrance north of York Street.	None	None
4	Treatment process activity inside the SCB.	Debris and PPE.	F001-F009; F011; F012; F019; F035; F039; K061; K062; K071.	1,937 P	Containment Building - Modified Tank	Encapsulate	SCB (Area A1)	None	None

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Envirosafe Services of Ohio, Inc. (ESOI) **Facility Type:** LQG/TSD **EPA ID#:** OHD 045 243 706

	Description of Waste				*On-Site Management*			*Off-Site Management*	
	Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	**Waste Generated** (e.g. sludge, spent solvent, ash, etc)	**EPA Waste Code**	**QTY Generated per Month**	Type of Accumulation/ Storage (e.g. container, tank, etc)	Type of On-Site Treatment (recycle, wwt, etc)	**Waste Location** (Include map if possible)	**Name, state, and type of activity occurring at the facility.**	**P2 Activity**
5	Housekeeping activity inside the SCB	Floor Dust.	F001-F009; F011; F012; F019; F035; F039; K061; K062; K071.	82,083 P	Containment Building - mix bin.	Stabilization	SCB (Area F)	None	None
6	Lab analysis from stabilization.	Lab samples for stabilization	F001-F009; F011; F012; F019; F035; K061; K062; K071.	3,925 P	5-gallon buckets	Stabilization	On-site lab and SCB	None	None
7	SCB baghouse operation.	Plant-wide baghouse dust.	F001-F009; F011; F012; F019; F035; F039; K061; K062; K071.	65,417 P	Containment Building - mix bin.	Stabilization	SCB	None	None

General Process Information

Envirosafe Services of Ohio, Incorporated ("ESOI" or "The Permittee"), formerly known as Fondessy Enterprises, Incorporated, is authorized to operate (on approximately 133 acres) a hazardous waste treatment, storage, and disposal facility in the City of Oregon, Lucas County, Ohio in accordance with the terms and conditions of the permit, ORC Chapter 3734, all applicable Ohio hazardous waste rules, all applicable regulations promulgated under the Resource Conservation and Recovery Act, as amended, and the approved permit application. The renewal of the closed landfill Cells F, G, H, and I is for the purposes of accomplishing post-closure activities. These units shall not be reactivated for management of Hazardous Waste. In the instance of inconsistent language or discrepancies between the renewal permit application and the subsequent modification application (received on January 22, 2004 and last updated on February 11, 2005), the language of the more stringent provision must govern. [Condition A.1.(a)]

ESOI accepts hazardous and non-hazardous industrial waste from off-site generators via railroad and truck transportation. ESOI services several industries that include chemical, steel, pharmaceutical, manufacturing, petroleum, and remediation. ESOI also generates various hazardous wastes on-site as a result of daily operations and analytical processes as shown in the provided table. To see a complete listing of the RCRA hazardous waste codes that ESOI accepted and/or generated in CY 2005, please see the ESOI 2006 Annual Hazardous Waste Report (AHWR), which is present in Ohio EPA's public files and was submitted by ESOI on 03/05/06.

Before shipment of any waste, generators must submit a completed Waste Profile Review Questionnaire (WPR) that includes analytical data on the waste stream, which is reviewed and either accepted or denied by ESOI and the Ohio EPA. Some of that waste is directly land-filled, but most is treated prior to disposal. Stabilization (treatment) is performed in order to meet the specific regulation-based Land Disposal Restrictions (LDR) as found in OAC Chapter 270. Stabilization occurs in the Stabilization/Containment Building (SCB) by adding kiln dust, cement, water, and other additives. ESOI also performs micro-encapsulation on debris waste streams in the SCB.

Prior to performing stabilization at ESOI, a representative sample of waste must be obtained from the generator. The ESOI laboratory then conducts a comprehensive treatability study in order to determine the proper stabilization mix design ratio, including specific additives necessary to achieve the desired result. When stabilization or solidification is performed to meet a handling characteristic, a bench-scale treatability study can be performed on a representative sample of the waste prior to actual disposal to ensure that LDR are met. Solidification of wastes (i.e., for the removal of free liquids, dust, or pH control) may be performed using inert clays or other reagents without the addition of cement or pozzolans (lime-silica cement). Stabilization systems may also be supplemented with other additives including liquid of solid proprietary chemicals designed to meet a specific treatment standard or handling characteristic within a particular waste matrix. Water is used as a fluxing agent ingredient in the waste stabilization mixture design and it is essential in both the Portland cement and pozzolanic systems.

For additional information on ESOI's operation, please refer to ESOI's 12/29/05 approved RCRA Part B Permit Application (Renewal and Expansion) as well as ESOI's Ohio Hazardous Waste facility installation and operation permit renewal (12/29/05).

Envirosafe Services of Ohio, Oregon, Ohio OHD045243706			
OAC Rule	**Description of Violation**	**RTC**	**ESC**
	Date of Inspection: 03/01/99 FRR Inspection		
	No violations cited.		
	Date of Inspection: 3/11/99 OTH Inspection		
PC C.3.(r)	Marking container violation	(3/15/99)	04/21/00
OAC Rule 3745-59-07(A)	Waste analysis violation	(3/15/99)	04/21/00
	Date of Inspection: 3/15/99 OTH Inspection		
PC K.4(b)(xiii)	Landfill disposal restriction violation	(4/01/99)	4/21/00
PC A.10	Reporting violation	05/13/99	04/21/00
	Date of Inspection: 4/01/99 OTH Inspection		
PC C.3(s)	Tracking log violation	4/02/99	4/21/00
PC C.3(f)	Container management violation	4/02/99	4/21/00
PC F.2(k)	Decontamination violation	4/02/99	4/21/00
PC A.9	General operation and maintenance violation	4/02/99	4/21/00
ORC §3734.02(F)	Illegal treatment, storage, disposal violation	4/02/99	4/21/00
	Date of Inspection: 4/07/99 O&M Inspection		
	No violations cited.		
	Date of Inspection: 6/10/99 OTH Inspection		
PC C.3(f)	Container management violation	6/10/99	4/21/00
PC F.2(k)	Decontamination violation	6/10/99	4/21/00
OAC Rule 3745-59-07	Waste analysis violation	6/10/99	4/21/00
	Date of Inspection: 6/23/99 CEI Inspection		
PC B.6	Personnel training violation	10/14/99	4/21/00
OAC Rule 3745-52-11	Waste evaluation violation	1/27/00	4/21/00

Envirosafe Services of Ohio, Oregon, Ohio OHD045243706			
OAC Rule	**Description of Violation**	**RTC**	**ESC**
Date of Inspection: 8/11/99 OTH Inspection			
PC C.3(s)	Tracking log violation	8/13/99	
Date of Inspection: 8/25/99 CEI Inspection			
PC K.4(b)	Land disposal restriction violation	1/14/00	
ORC §3734.02	Illegal treatment, storage, disposal violation (waste test violation)	1/14/00	
PC E.2(b)	Access violation	8/27/99	
PC C.3(s)	Tracking log violation	9/10/99	
OAC Rule 3745-55-73(A)	Container management violation	12/16/99	
PC C.3(f)	Container management violation	12/16/99	
PC E.2(d)	Railroad car labeling violation	9/20/99	
ORC §3734.02	Illegal treatment violation	1/14/00	
Date of Inspection: 10/04/99 OTH Inspection			
OAC Rule 3745-55-73(A)	Container management violation	11/04/99	
PC C.3(f)	Container management violation	10/04/99	
Date of Inspection: 10/06/99 OTH Inspection			
OAC Rule 3745-55-73	Container management violation	1/12/00	
Date of Inspection: 10/29/99 OTH Inspection			
PC F.2(k)	Decontamination violation	12/21/99	
Date of Inspection: 11/01/99 OTH Inspection			
PC K.4(b)	Land disposal restriction violation	1/21/00	
Date of Inspection: 11/08/99 OTH Inspection			
PC E.2(d)	Railroad car labeling violation	11/08/99	
Date of Inspection: 11/12/99 OTH Inspection			

Envirosafe Services of Ohio, Oregon, Ohio OHD045243706			
OAC Rule	Description of Violation	RTC	ESC
OAC Rule 3745-55-73(A)	Container management violation	11/12/99	
PC C.3(f)	Container management violation	11/12/99	
Date of Inspection: 11/16/99 OTH Inspection			
OAC Rule 3745-55-73(A)	Container management violation	11/16/99	
PC C.3(f)	Container management violation	11/16/99	
Date of Inspection: 11/22/99 OTH Inspection			
PC F.2(k)	Decontamination violation	11/22/99	
Date of Inspection: 12/13/99 CEI Inspection			
	No violations cited.		
Date of Inspection: 1/14/00 OTH Inspection			
PC F.2(K)	Decontamination violation	1/20/00	
Date of Inspection: 1/25/00 OTH Inspection			
PC F.2(K)	Decontamination violation	2/04/00	
Date of Inspection: 2/03/00 CEI Inspection			
OAC Rule 3745-55-73(A)	Container management violation	(3/17/00)	
PC C.3(f)	Container management violation	(3/17/00)	
Date of Inspection: 2/29/00 FRR Evaluation			
OAC Rule 3745-55-47	Liability insurance violation	5/05/00	
Date of Inspection: 3/17/00 OTH Inspection			
PC K.4.b(xiii) & V.7	Permit violation and Consent Order and Final Judgement Violation	1/01/01	
Date of Inspection: 3/21/00 CEI Inspection			
OAC Rule 3745-54-31 & PC B.1	Construction, maintenance, and operation violation	4/18/00	

Envirosafe Services of Ohio, Oregon, Ohio OHD045243706			
OAC Rule	**Description of Violation**	RTC	**ESC**
	Date of Inspection: 4/10/00 **CEI Inspection**		
OAC Rule 3745-54-73(B) & PC B.22(d)(viii)	**Record-keeping violation**	**7/13/00**	
OAC Rule 3745-279-22 (C)(1)	**Used oil violation**	**5/09/00**	
PC C.3(c)	**Container management violation**	**5/09/00**	
OAC Rule 3745-55-73(A) & PC C.3(f)	**Container management violation**	**5/09/00**	
PC F.2(K)	**Decontamination violation**	**5/09/00**	
	Date of Inspection: 6/09/00 OTH Inspection		
OAC Rule 3745-59-50(C)	**Storage violation**	**8/11/00**	
PC C.3(q)	**Container storage violation**	**8/11/00**	
	Date of Inspection: 8/14/00 CME Inspection		
	No violations cited.		
	Date of Inspection: 9/26/00 OTH Evaluation		
Consent Order V.7	**Consent Order and Final Judgement violation**	**2/06/01**	
PC A.9	**General operation and maintenance violation**	**3/06/01**	
PC K.4(b)(xiii)	**Disposing of waste that does not meet LDR.**	**2/06/01**	
	Date of Inspection: 10/03/00 OTH Evaluation		
PC K.4(b)(xiii)	**Disposing of** waste that does not meet LDR.	2/06/01	
	Date of Inspection: 11/21/00 OTH Evaluation		
CFO V.6, PC C.3(r)	**Labeling violation.**	12/13/00	
	Date of Inspection: 1/18/01 OTH Evaluation		
PC F.2(k)	**Decontamination violation.**	1/18/01	
	Date of Inspection: 2/28/01 **FRR Evaluation**		

Envirosafe Services of Ohio, Oregon, Ohio OHD045243706			
OAC Rule	**Description of Violation**	**RTC**	**ESC**
	No violations cited.		
Date of Inspection: 4/03/01 O&M Inspection			
OAC Rule 3745-54-75	Annual report violation.	(7/19/01)	
Date of Inspection: 4/04/01 CEI Evaluation			
OAC Rule 3745-54-16(C)	Personnel training violation.	7/19/01	
PC	Weekly inspection violation.	7/19/01	
PC	Failing to submit a weekly incident report to the director.	6/01/01	
OAC Rule 3745-54-15(D)	Inspection violation.	7/19/01	
OAC Rule 3745-54-31 and PC B.1	Maintenance and operation violation.	7/19/01	
PC	Weekly inspection violation.	7/19/01	
PC B.5(k)(i)(a)	Weekly inspection violation.	7/19/01	
Date of Inspection: 4/27/01 NRR Evaluation			
PC K.5	Leachate accumulation violation.	(5/24/01)	
Date of Inspection: 5/24/01 NRR Evaluation			
OAC Rule 3745-54-98 (G)(1)	Failing to notify the director.	8/30/01	
OAC Rule 3745-54-98 (G)(2)	Failing to conduct sampling and analysis violation.	8/30/01	
OAC Rule 3745-54-99 (D)(2)	Failing to determine whether there was statistically significant evidence violation.	8/30/01	
PC G.2(d)(iii)	Failing to submit final ground water sampling report	8/30/01	
Date of Inspection: 10/02 & 10/03/01 CEI Evaluation			
PC F.2(k) and Consent Order V.5	Waste tracking.	10/02/01	

Envirosafe Services of Ohio, Oregon, Ohio OHD045243706			
OAC Rule	**Description of Violation**	**RTC**	**ESC**
PC F.3(e)(i)(a) & Permit Application volume 7, subsection D-6J	**Failure to properly inspect micro encapsulation containers.**	**10/18/01**	
Date of Inspection: 10/20/01 CEI Evaluation			
PC F.2(k) and Order	**Hazardous waste tracking**	**12/03/01**	
Date of Inspection: 10/29/01 CEI Evaluation			
PC F.2(k) and Consent Order V.5	**Waste tracking.**	**10/30/01**	
Date of Inspection: 11/07/01 NRR Evaluation			
	No violations cited.		
Date of Inspection: 1/31/02 OTH Evaluation			
	No violations cited.		
Date of Inspection: 2/06/02 NRR Evaluation			
	No violations cited.		
Date of Inspection: 2/15/02 OTH Evaluation			
PC F.2(k)	Hazardous waste tracking	2/22/02	
Date of Inspection: 4/01/02 CEI Evaluation			
PC F.2(k)	**Hazardous waste tracking**	**4/01/02**	
Date of Inspection: 4/10/02 O&M Evaluation			
	No violations cited.		
Date of Inspection: 5/09/02 NRR Evaluation			
	No violations cited.		

Envirosafe Services of Ohio, Oregon, Ohio OHD045243706			
OAC Rule	**Description of Violation**	**RTC**	**ESC**
	Date of Inspection: 5/14/02 CEI Evaluation		
	No violations cited.		
	Date of Inspection: 5/19/04 FRR Evaluation		
	No violations cited.		
	Date of Inspection: 6/11/02 FRR Evaluation		
	No violations cited.		
	Date of Inspection: 9/20/02 NRR Evaluation		
	No violations cited.		
	Date of Inspection: 11/06/02 CEI Evaluation		
3745-54-72(B) & PC B.3(a)(v)(a)	**Manifest recordkeeping (manifest discrepancies)**	**12/18/02**	
	Date of Inspection: 2/07/03 NRR Evaluation		
	No violations cited.		
	Date of Inspection: 2/18/03 OTH Evaluation		
PC C.3(o) & 3745-55-75 (B)(5)	**Removal of waste/precipitation from sump.**	**4/10/03**	
	Date of Inspection: 3/28/03 OTH Evaluation		
	No violations cited.		
	Date of Inspection: 4/08/03 O&M Evaluation		
	No violations cited.		
	Date of Inspection: 4/22/03 FRR Evaluation		
	No violations cited.		
	Date of Inspection: 5/20/03 CEI Evaluation		

Envirosafe Services of Ohio, Oregon, Ohio OHD045243706			
OAC Rule	**Description of Violation**	**RTC**	**ESC**
	No violations cited.		
Date of Inspection: 6/25/03 OTH Evaluation			
PC I.1(c)(iv)(a)	Failed to prevent trees, shrubs, or other deep-rooted plants from growing on closed landfill cells.	9/17/03	
Date of Inspection: 6/30/03 OTH Evaluation			
3745-54-72(B)	Manifest discrepancies.	10/23/03	
Date of Inspection: 8/21/03 NRR Evaluation			
	No violations cited		
Date of Inspection: 9/12/03 OTH Evaluation			
PC K.4.(a)(I) & PC K.4.(a)(iii)(a)	Failed to remove liquid from leak detection systems	11/13/03	
PC A.23 & OAC Rule 3745-50-42(D)	Failed to follow signature certification requirements on leachate monitoring reports	11/13/03	
Date of Inspection: 10/6/03 O&M Evaluation			
	No violations cited		
Date of Inspection: 10/06/03 OTH Evaluation			
PC B.5(e)(ii) & OAC Rule 3745-54-14(B)	Failed to keep secondary gates locked	11/21/03	
Date of Inspection: 10/27/03 CEI Evaluation			
	No violations cited.		
Date of Inspection: 4/05/04 O&M Evaluation			
	No violations cited		
Date of Inspection: 5/11/04 CEI Evaluation			

Envirosafe Services of Ohio, Oregon, Ohio OHD045243706			
OAC Rule	Description of Violation	RTC	ESC
PC B.5.(b) & 3745-54-72(B)	Manifest discrepancies.	8/05/04	
PC B.5.(a) & PC I.(c)(vi)(b)	Failed to conduct inspections of post-closure areas according to required frequency	8/05/04	
PC B.5.(g)(ii) – (vi)	Failed to conduct inspections of storage tanks according to required frequency	8/05/04	
PC A.5 & A.9.(a)	Non-compliance as a result of violations cited	8/05/04	
Date of Inspection: 5/24/04 & 6/04/04 OTH Evaluation			
PC B.1	Failed to prevent waste tracking	6/09/04	
Date of Inspection: 10/26/04 CEI Evaluation			
	No violations cited.		
Date of Inspection: 05/09/05 and 05/10/05 CEI Evaluation			
PC B.1	Failed to prevent waste tracking	05/26/05	
3745-52-34(C)(1)	Open and unlabeled storage container	05/18/05	
PC A.5. & A.9.(a)	Non-compliance as a result of violations cited	as above	
Date of Inspection: 10/24/05 to 10/27/05 CEI Evaluation			
PC B.1. & F.2.(k)	Failed to prevent waste tracking	10/24/05	
3745-66-73(A) & 3745-52-34(C)(1)(b)	Open and unlabeled storage container	10/24/05	
PC F.2.(d)(ii)	Open SCB doors without vehicles, personnel, or equipment entering or exiting the building	10/24/05	
PC K.5.(a)	Not complying with the facility surface water management plan	11/15/05	
PC B.5.(k)(i)(d)	Not adequately assessing the run-on/run-off control structures at the facility	11/15/05	
PC A.5. & A.9.(a)	Non-compliance as a result of violations cited	as above	

Envirosafe Services of Ohio, Inc., EPA HW# Waste Code Listing

D001	D002	D003	D004	D005	D006	D007
D008	D009	D010	D011	D012	D013	D014
D015	D016	D017	D018	D019	D020	D021
D022	D023	D024	D025	D026	D027	D028
D029	D030	D031	D032	D033	D034	D035
D036	D037	D038	D039	D040	D041	D042
D043						
F001	F002	F003	F004	F005	F006	F007
F008	F009	F010	F011	F012	F019	F024
F025 (1)	F027 (2)	F032 (1)	F034	F035	F037	F038
F039						
K001	K002	K003	K004	K005	K006	K007
K008	K009	K010	K011	K013	K014	K015
K016	K017	K018	K019	K020	K021	K022
K023	K024	K025	K026	K027	K028	K029
K030	K031	K032	K033	K034	K035	K036
K037	K038	K039	K040	K041	K042	K043
K044	K045	K046	K047	K048	K049	K050
K051	K052	K060	K061	K062	K064	K065
K066	K069	K071	K073	K083	K084	K085
K086	K087	K088	K090	K091	K093	K094
K095	K096	K097	K098	K099	K100	K101
K102	K103	K104	K105	K106	K107 (1)	K108 (1)
K109 (1)	K110 (1)	K111	K112	K113	K114	K115
K116	K117	K118	K123	K124	K125	K126
K131 (1)	K132 (1)	K136	K141	K142	K143	K144
K145	K147	K148	K149	K150	K151	K156
K157	K158	K159	K161	K169 (1)	K170 (1)	K171 (1)
K172 (1)	K174	K175 (3)	K176	K177	K178	
P001 (1)	P002 (1)	P003 (1)	P004 (1)	P005 (1)	P006 (1)	P007 (1)
P008 (1)	P009 (1)	P010 (1)	P011 (1)	P012 (1)	P013 (1)	P014 (1)
P015 (1)	P016 (1)	P017 (1)	P018 (1)	P020 (1)	P021 (1)	P022 (1)
P023 (1)	P024 (1)	P026 (1)	P027 (1)	P028 (1)	P029 (1)	P030 (1)
P031 (1)	P033 (1)	P034 (1)	P036 (1)	P037 (1)	P038 (1)	P039 (1)
P040 (1)	P041 (1)	P042 (1)	P043 (1)	P044 (1)	P045 (1)	P046 (1)
P047 (1)	P048 (1)	P049 (1)	P050 (1)	P051 (1)	P054 (1)	P056 (1)
P057 (1)	P058 (1)	P059 (1)	P060 (1)	P062 (1)	P063 (1)	P064 (1)
P065 (1)	P066 (1)	P067 (1)	P068 (1)	P069 (1)	P070 (1)	P071 (1)
P072 (1)	P073 (1)	P074 (1)	P075 (1)	P076 (1)	P077 (1)	P078 (1)
P081 (1)	P082 (1)	P084 (1)	P085 (1)	P087 (1)	P088 (1)	P089 (1)
P092 (1)	P093 (1)	P094 (1)	P095 (1)	P096 (1)	P097 (1)	P098 (1)
P099 (1)	P101 (1)	P102 (1)	P103 (1)	P104 (1)	P105 (1)	P106 (1)
P108 (1)	P109 (1)	P110 (1)	P111 (1)	P112 (1)	P113 (1)	P114 (1)
P115 (1)	P116 (1)	P118 (1)	P119 (1)	P120 (1)	P121 (1)	P122 (1)
P123 (1)	P127 (1)	P128 (1)	P185 (1)	P188 (1)	P189 (1)	P190 (1)
P191 (1)	P192 (1)	P194 (1)	P196 (1)	P197 (1)	P198 (1)	P199 (1)
P201 (1)	P202 (1)	P203 (1)	P204 (1)	P205 (1)		
U001	U002	U003	U004	U005	U006	U007
U008	U009	U010	U011	U012	U014	U015
U016	U017	U018	U019	U020	U021	U022
U023 (1)	U024	U025	U026	U027	U028	U029
U030	U031	U032	U033 (1)	U034	U035	U036
U037	U038	U039	U041	U042	U043	U044
U045	U046	U047	U048	U049	U050	U051
U052	U053	U055	U056	U057	U058	U059
U060	U061	U062	U063	U064	U066	U067
U068	U069	U070	U071	U072	U073	U074
U075 (1)	U076	U077	U078	U079	U080	U081

U246	U247	U248	U249	U271	U278	U279
U280	U328	U353	U359	U364	U367	U372
U373	U387	U389	U394	U395	U404	U409
U410	U411					

Codes with no marking denote no restriction and include residues from incineration, carbon regeneration (by thermal incineration), wastewater treatment and any other residues.

(1) Codes marked with "(1)" denote restriction to residues from treatment by incineration, carbon regeneration (by thermal incineration), wastewater treatment and any secondary residues such as soils and debris derived from the primary residues.

(2) Codes marked with "(2)" denote derivation from incineration residues from the incineration of obsolete EPA HW Numbers P090 (which became U242), U212, U230, U231, U232, U233 and U244 now identified as F027 which meet all applicable land disposal restriction standards fro F027 in OAC Rule 3745-270-40.

(3) Codes marked with "(3)" have additional special requirements such as macroencapsulation and pH adjustment as part of their applicable land disposal restriction standards. Refer to OAC Rule 3745-270-40.

POLLUTION PREVENTION

Note to the Inspector: This checklist has been developed to help the division in gathering general information about the pollution prevention (P2) practices that the company may have initiated or attempted to initiate. The checklist is also used to:

- Facilitate P2 discussions;
- Identify barriers to P2;
- Define the P2 universe;
- Identify the need for future P2 initiatives;
- Identify partnership opportunities; and
- Link companies with better P2 resources.

As a prelude to completing this checklist the inspector should use the following list of questions as a way to initiate a dialogue concerning P2:

1. Have you tried to reduce the volume of waste (hazardous and nonhazardous) that you generate?
   Yes

2. What is the largest waste stream that you generate?
   F039 multi source leachate

3. How important would it be to you to eliminate that waste stream?
   Facility continues to look at ways to reduce this waste stream

4. Does your company understand the reduced regulatory burden and cost saving benefits that eliminating or reducing a waste stream can have?
   Yes

5. Could you use better housekeeping practices to reduce the amount of waste that you generate?
   No

If the company responds with one of the answers below, the appropriate box should be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided in the remarks section.

1. Has the company undertaken any P2 activities to reduce the amount of waste generated? Yes __x__ No ❑ N/A ___RMK#____

   a. If so, what has the company done to minimize waste generation?

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

b. ***If so,*** what wastes have been addressed?

- ❑ Solvents
- ❑ Paint related wastes
- xx Industrial process wastes (sludges, slags, contaminated wastes waters, etc.)
- ❑ Contaminated oils/hydraulic fluids
- ❑ Off-spec chemicals
- ❑ Shop rags
- ❑ Other (specify):
- ❑ Waste water
- ❑ Solid waste (paper, plastic, metal, wood, blasting material)
- ❑ Air emissions
- ❑ Energy use
- ❑ Fluorescent light bulbs
- ❑ Used batteries

c. If they haven't minimized waste are there barriers that are preventing them from doing it?

- ❑ Lack of information about practical alternatives.
- ❑ Lack of capital to make process changes.
- ❑ Lack of internal management support (lamp recycling)
- ❑ The company does not generate enough waste to consider P2.
- xx Other reason given (specify): technical difficulties with LDR requirements

2. Does the company plan to do P2 activities in the future? Yes _X_ No ❑ N/A ___RMK#____

3. Would the company be interested in receiving additional information from Ohio EPA about P2? Yes ____No _X_ N/A ___RMK#____

4. Did you give the company information about P2 during the inspection? Yes ___ No _X_ N/A ___RMK#____

5. Would the company like a P2 assessment? Yes ____No _X_ N/A ___RMK#____

A. If yes, provide information that makes the company a good candidate for an assessment (i.e., known specific P2 opportunities exist, the company is willing to cooperate and commit resources to the assessment, the company fully understands DHWM's P2 assessment process, etc.)

B. If no, list the reasons the facility representative gave for not wanting an assessment.

If the company would like a P2 assessment done at their facility, the inspector must give the company representative a copy of the <u>Pollution Prevention Assessments for Hazardous Waste Generators</u> document and discuss it with them (Attachment III of the P2 Assessment Procedures Manual at: http://www.epa.state.oh.us/dhwm/pdf/P2AssesmentHWGenerators.pdf).

MODULE A – GENERAL PERMIT CONDITIONS

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1 Has the Permittee submitted the annual permit fee, calculated pursuant to OAC Rule 3745-50-36, payable to the Treasurer, State of Ohio, to the director of Ohio EPA on or before the anniversary of the date of issuance during the term of the permit? [PC A.26.]

Yes _X_ No ☐ N/A ___RMK#___

2. Is the Permittee conducting any hazardous waste management activities (not otherwise expressly authorized or specifically exempted by law) that are not authorized by the permit? [PC A.1.(b)]

Yes ☐ No_X_N/A ___RMK#___

3. Have any provisions of the permit been identified as invalid? [PC A.4.]

Yes ___No_X_N/A ____RMK#___

4. Has the Permittee complied with all the terms and conditions of the permit, except to the extent and for the duration such noncompliance is authorized by the laws of the State of Ohio? [PC A.5.]

Yes ___No _X_N/A ___RMK#_1_

NOTE: ***Any permit noncompliance, other than noncompliance authorized by the laws of the State of Ohio, constitutes a violation of ORC Chapter 3734, and is grounds for enforcement action, revocation, modification, denial of a permit renewal application, or other appropriate action. [PC A.5.]***

5. Has the expiration date of the permit passed? If so:

Yes ___No_X_N/A ___RMK#_2_

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 Permittee submitted an application for a permit renewal to the director no later than 180 days prior to the expiration date of the permit (or upon a later date if the Permittee can demonstrate good cause for late submittal)? [PC A.6.(a)]

Yes ____No___N/A_X_RMK#___

NOTE: ***The Permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if the Permittee has submitted a timely and complete application; and, through no fault of the Permittee, a new permit has not been issued pursuant to OAC Rule 3745-50-40 on or before the expiration date of the permit. [PC A.6.(b)(i) and (ii)]***

NOTE: ***The Permittee is obligated to complete facility-wide Corrective Action under the conditions of this permit regardless of the operational status of the facility. An application for permit renewal must be submitted at least 180 days before expiration of the permit pursuant to OAC Rule 3745-50-40(D) unless; a) the corrective action schedule has been terminated by modification and financial assurance requirements for corrective action are no longer required; or b) the Director authorizes a later submittal.***

6. Has the Permittee taken all reasonable steps to minimize releases to the environment and carry out such measures as are reasonable to prevent significant adverse impact on human health or the environment resulting from noncompliance with the permit? [PC A.8.] — Yes _X_ No ❑ N/A ___RMK#___

7. Does the Permittee properly operate and maintain the facility (and related appurtenances) at all times to achieve compliance with the terms and conditions of the permit? [PC A.9.] If no, then does improper operation and maintenance include: — Yes _X_ No __ N/A__ RMK# ___

   a. Ineffective management practices? — Yes ❑ No___N/A _X_RMK#___

   b. Inadequate funding? — Yes ❑ No___N/A _X_ RMK#___

   c. Inadequate operator staffing and training? — Yes __ No___ N/A_X_ RMK# __

   d. Where appropriate, inadequate laboratory and process controls, including inappropriate quality assurance/quality control procedures? — Yes ❑ No___N/A _X_RMK#___

8. Has the Permittee established operation of a back-up or auxiliary facility or similar system (only when necessary) to achieve compliance with the terms and conditions of the permit? [PC A.9.] — Yes _X_ No ❑ N/A ___RMK#___

9. Has the Permittee orally reported to Ohio EPA, DERR within 24 hours from the time the Permittee becomes aware of any instances of noncompliance with the permit, ORC Chapter 3734, or the rules adopted thereunder, which may endanger human health or the environment? If yes, then did the notification include: [PC A.20.(a)] — Yes ___ No_X_ N/A ___ RMK#__

   a. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies? [PC A.20.(a)(i)] — Yes ___ No ❑ N/A _X_RMK#___

   b. Information concerning a release or discharge of hazardous waste, fire, or explosion at the facility that could threaten human health or the environment? [PC A.20.(a)(ii)] — Yes ___ No ❑ N/A _X_ RMK#__

   Did the report consist of the following:

   a. Name, address, and telephone number of the owner or operator? [PC A.20.(b)(i)] — Yes _X_ No ❑ N/A ___RMK#___

   b. Name, address, and telephone number of the facility? [PC A.20.(b)(ii)] — Yes _X_ No ❑ N/A ___RMK#___

c. Date, time, and time of incident? [PC A.20.(b)(iii)] — Yes _X_ No ❑ N/A ___ RMK#___

d. Name and quantity of material(s) involved? [PC A.20.(b)(iv)] — Yes _X_ No ❑ N/A ___ RMK#___

e. The extent of injuries, if any? [PC A.20.(b)(v)] — Yes ___ No ❑ N/A _X_ RMK#___

f. An assessment of the actual or potential hazard to the environment and human health, outside of the facility, where applicable? [PC A.20.(b)(vi)] — Yes _X_ No ❑ N/A ___ RMK#___

g. Estimated quantity and disposition of recovered material that resulted from the incident? [PC A.20.(b)(vii)] — Yes _X_ No ❑ N/A ___ RMK#___

10. Did the Permittee provide a written report to Ohio EPA's DERR and DHWM, NWDO within 5 days of the time that the Permittee became aware of the instance reported in PC A.20.? [PC A.21.(a)] — Yes ___ No ___ N/A _X_ RMK#___

If so, then did the report contain the following:

a. A description of the noncompliance and its causes? [PC A.21.(b)] — Yes ___ No ❑ N/A _X_ RMK#___

b. The period(s) of noncompliance (including exact dates and times)? [PC A.21.(b)] — Yes ___ No ❑ N/A _X_ RMK#___

c. Whether the noncompliance has been corrected? [PC A.21.(b)]. — Yes ___ No ❑ N/A _X_ RMK#___

d. If no, then the anticipated time noncompliance is expected to continue? [PC A.21.(b)] — Yes ___ No ❑ N/A _X_ RMK#___

e. Steps taken or planned to minimize the impact on human health and the environment, and to reduce, eliminate, and prevent recurrence of the noncompliance? [PC A.21.(b)] — Yes ___ No ❑ N/A _X_ RMK#___

NOTE: ***The Permittee need not comply with the 5 day written report requirement if the director, upon good cause shown by the Permittee, by order, waives that requirement and the Permittee submits a written report within 15 days of the time the Permittee becomes aware of the release, discharge, or incident reported pursuant to PC A.20. [PC A.21.(c)]***

11. Has the Permittee identified any other instances of noncompliance? If so, then: — Yes _X_ No___ N/A___ RMK# 56

a. Did the Permittee report these instances to the director within 30 days of the time the Permittee was aware of the noncompliance? [PC A.22.] — Yes ___ No_X_ N/A__ RMK# 56

b. Do the reports provided contain the information set forth in Condition A.20? [PC A.22.] — Yes _X_ No ❑ N/A __RMK# 56__

12. Has the Permittee planned any changes in the permitted facility or operations that may result in noncompliance with the conditions of the permit? If so, then: — Yes ___No_X_N/A ___RMK#___

a. Has the Permittee provided the director with advance notice of such changes? [PC A.17.] — Yes ___ No ❑ N/A _X_RMK#___

NOTE: ***Such notification does not waive the Permittee's duty to comply with the permit pursuant PC A.5. [PC A.17.]***

PERMIT MODIFICATION, REVISION, REVOCATION

13. Has the Permittee commenced treatment, storage, or disposal of hazardous waste in a modified portion of the facility prior to submitting a letter to the director, signed by the Permittee and a registered professional engineer stating that the facility has been constructed, or modified in compliance with the permit? [PC A.23.] If yes, then: — Yes ❑ No_X_N/A ___RMK#___

a. has the director inspected the modified or newly constructed facility and found it in compliance with the conditions of the permit? [PC A.23.(a)] Or : — Yes ___ No ❑ N/A _X_RMK#___

b. has the director waived the inspection or has not notified the Permittee of his intent to inspect within 15 days of the date of the submittal of the letter in PC A.23.? [PC A.23.(b)] — Yes ___ No ❑ N/A _X_RMK#___

14. Has the permit been transferred to a new owner or operator since the last CEI? [PC A.18.] If so, then: — Yes ___No_X_N/A___RMK#___

a. Has the transfer been conducted in accordance with ORC 3734 and the rules adopted thereunder, and modified under OAC Rule 3745-50-51? [PC A.18.(a)] — Yes ___ No ❑ N/A _X_RMK#___

b. Before transferring ownership or operation, did the Permittee notify the new owner or operator, in writing, of the requirements of ORC Chapter 3734, the rules adopted thereunder (including applicable Corrective action requirements)? [PC A.18.(a)] — Yes ___ No ❑ N/A _X_RMK#___

NOTE: ***Failure to notify the new owner or operator of the requirements of the applicable Ohio law or hazardous waste rule by the Permittee does not relieve the new owner or operator of its obligation to comply with all applicable requirements. [PC A.18.(b)]***

15. Has the Permittee submitted reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit to the director no later that 14 days following each scheduled date? [PC A.19.] Yes _X_ No ❑ N/A __RMK#___

16. Has the Permittee furnished relevant information requested by the director to determine whether cause exists for modifying or revoking, or to determine compliance with the permit? [PC A.10.] Yes _X_ No ❑ N/A __RMK#___

17. Has the facility furnished the director, upon request, copies of records required to be kept by the permit? [PC A.10.] Yes _X_ No ❑ N/A __RMK#___

18. Has the Permittee become aware that it failed to submit any relevant facts, or submitted incorrect information to the director? [PC A.24.] If so, then: Yes _X_ No ❑ N/A __RMK#___

    a. Has the Permittee promptly submitted such facts, information, or corrected information to the director? [PC A.24.] Yes _X_ No ❑ N/A __RMK#___

19. Is the Permittee planning any physical alterations or additions to the permitted facility? If so, then: Yes _X_ No ❑ N/A __RMK#___

    a. Has the Permittee given notice to the director of such alterations/additions as soon as possible? [PC A.15.] Yes _X_ No ❑ N/A __RMK#___

    b. Have such changes been made in accordance with OAC Rule 3745-50-51? [PC A.15.] Yes _X_ No ❑ N/A __RMK#___

SITE ENTRY – AVAILABILITY OF RECORDS

20. Has the Permittee allowed the director, or an authorized representative, upon stating the purpose and necessity of the inspection and upon proper identification to:

    a. Enter the premises, at reasonable times, where a regulated facility or activity is located or conducted, or where records must be kept under the terms and conditions of the permit? [PC A.11.(a)(i)] Yes _X_ No ❑ N/A __RMK#___

    b. Have access to and copy, at reasonable times, any records required to be kept under the terms and conditions of the permit? [PC A.11.(a)(ii)] Yes _X_ No ❑ N/A __RMK#___

    c. Inspect and photograph, at reasonable times, any facilities, equipment (including control and monitoring equipment), practices, or operations regulated or required under the terms and conditions of the permit? [PC A.11.(a)(iii)] Yes _X_ No ❑ N/A __RMK#___

d. Sample, document, or monitor, at reasonable times, any substance or parameter at any location of the facility to assure permit compliance or as otherwise authorized by ORC Chapter 3734, and the rules adopted thereunder? [PC A.11.(a)(iv)] Yes _X_ No ❑ N/A ___RMK#___

NOTE: ***Any record, report, or other information obtained under the hazardous waste rules or ORC Chapter 3734 shall not be available to the public upon showing to Ohio EPA that the information would divulge methods or processes entitled to protection as trade secrets pursuant to Ohio Trade Secret Laws and OAC Rule 3745-50-30.***

RECORD KEEPING REQUIREMENTS

21. Has the Permittee requested confidentiality of any information of the permit, or any information obtained by the director or an authorized representative, pursuant to the authority provided under PC A.11. and in accordance with ORC Chapter 3734? [PC A.25.] Yes_X_No__N/A ___RMK#_5__

22. Is the Permittee maintaining, until closure is complete and certified by an independent, registered professional engineer, the following documents (including amendments, revisions, and modifications): [PC A.28.(a)]

a. WAP in accordance with OAC Rule 3745-54-13, and the terms and conditions of the permit? [PC A.28.(a)(i)] Yes _X_ No ❑ N/A ___RMK#___

b. Contingency Plan in accordance with OAC Rule 3745-54-53, and the terms and conditions of the permit? [PC A.28.(a)(ii)] Yes _X_ No ❑ N/A ___RMK#___

c. Closure Plan in accordance with OAC Rule 3745-55-12, and the terms and conditions of the permit? [PC A.28.(a)(iii)] Yes _X_ No ❑ N/A __ RMK#_6__

d. Cost Estimate for facility closure, in accordance with OAC Rule 3745-55-42, and the terms and conditions of the permit? [PC A.28.(a)(iv)] Yes _X_ No ❑ N/A ___RMK#_7__

e. Personnel Training Plan and records required by OAC Rule 3745-54-16, and the terms and conditions of the permit? [PC A.28.(a)(v)] Yes _X_ No ❑ N/A ___RMK#___

f. Operating Record required by OAC Rules 3745-54-73, and the terms and conditions of the permit? [PC A.28.(a)(vi)] Yes _X_ No ❑ N/A ___RMK#___

g. Inspection Schedules developed in accordance with OAC Rules 3745-54-15, 3745-55-74, and 3745-55-95 and the terms and conditions of the permit? [PC A.28.(a)(vii)] Yes _X_ No ❑ N/A ___RMK#___

h. Post-closure plan as required by OAC Rule 3745-55-18(A) and the terms and conditions of the permit? [PC A.28.(a)(viii)] — Yes _X_ No ❑ N/A ___ RMK#___

i. Annually adjusted cost estimate for facility closure and post-closure, as required by OAC Rules 3745-55-42 and 3745-55-44 and the terms and conditions of this permit? [PC A.28.(a)(ix)] — Yes _X_ No ❑ N/A ___ RMK#___

j. All other documents required by PC A.12. and PC F.5. [PC A.28.(a)(x)] — Yes _X_ No ❑ N/A ___ RMK#___

23. Has the Permittee maintained copies of all inspection logs at the facility for a period not less than three years from the date of inspection? [PC A.28.(b)] — Yes _X_ No ❑ N/A ___ RMK#___

24. Does the Permittee ensure that any sample and measurement taken for the purpose of monitoring is a representative sample or measurement, as such term is defined and used in the Ohio hazardous waste rules? [PC A.12.(a)] — Yes _X_ No ❑ N/A ___ RMK#___

25. Is the method used to obtain a representative sample of the waste to be analyzed the appropriate method from Appendix I of OAC Rule 3745-51-20? [PC A.12.(a)] — Yes _X_ No ❑ N/A ___ RMK#___

26. Are laboratory test methods used specified in Test Methods for Evaluating Solid Waste, Physical / Chemical Methods; SW-846: Third Edition , November 1992, and additional supplements or editions thereof; Standard Methods for the Examination of Water and Wastewater, 20th Edition, 1999, or, an equivalent method as specified in the approved WAP, or as such term is defined and used in the Ohio hazardous waste rules? [PC A.12.(a)] — Yes _X_ No ❑ N/A ___ RMK#___

27. Has the on-site laboratory QAP been formally reviewed at least once during the calendar year and updated if necessary? [PC A.12.(a)] — Yes _X_ No ❑ N/A ___ RMK# 8

28. Do the Permittee's records of monitoring information specify the following:

a. Date(s), exact place(s), and time(s) of sampling or measurements? [PC A.12.(b)(i)] — Yes _X_ No ❑ N/A ___ RMK#___

b. Individual(s) who performed the sampling or measurement? [PC A.12.(b)(ii)] — Yes _X_ No ❑ N/A ___ RMK#___

c. Date(s) analyses were performed? [PC A.12.(b)(iii)] — Yes _X_ No ❑ N/A ___ RMK#___

d. Individual(s) who performed the analyses? [PC A.12.(b)(iv)] — Yes _X_ No ❑ N/A ___ RMK#___

e. Analytical technique(s) or method(s) used? [PC A.12.(b)(v)] Yes _X_ No ❑ N/A ___RMK#___

f. Results of such analyses, including detection limits? [PC A.12.(b)(vi)] Yes _X_ No ❑ N/A ___RMK#___

29. Have all applications, reports, or information been properly signed and certified in accordance with OAC Rule 3745-50-58(K). [PC A.13.] Yes _X_ No ❑ N/A ___RMK#___

30. Has the Permittee retained records of all monitoring information, including all calibration and maintenance records, all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports and records required by this permit, the certification required by OAC Rule 3745-54-73(B)(9), and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the sample, measurement, report, certification, or application? [PC A.14.(a)] Yes _X_ No ❑ N/A ___RMK#___

NOTE: The period of record retention may be extended by request of the director at any time and is automatically extended during the course of any unresolved enforcement action regarding the facility. [Condition A.14.(b)]

31. Has the Permittee maintained, in accordance with Ohio hazardous waste rules, records of all data used to complete the permit application and any amendments, supplements, or modifications of such application and retained a complete copy of the application for a period of at least five years from the effective date of the permit? [PC A.14.(c)] Yes _X_ No ❑ N/A ___RMK#___

32. Has the Permittee maintained a document repository in compliance with OAC Rule 3745-50-58? [PC A.14.(d)] Yes _X_ No ❑ N/A ___RMK#___

33. Has the Permittee maintained records from all ground water monitoring wells and associated ground water surface elevations for the active life of the facility, and for disposal facilities for the post-closure care period? [PC A.14.(e)] Yes _X_ No ❑ N/A ___RMK#___

34. Has the Permittee maintained Corrective Action records for at least three years after all Corrective Action activities have been completed? [PC A.14.(f)] Yes _X_ No ❑ N/A ___RMK#___

COMPLIANCE SCHEDULE – SUBMITTAL OF DOCUMENTS TO OHIO EPA

35. Did the Permittee submit the following documents to Ohio EPA to be incorporated into the permit application within 90 days after permit journalization: [PC A.27.(b)]

a. A copy of the current closure/post-closure estimate as set forth in OAC Rules 3745-55-42 and 3745-55-44 to update Section I of the permit application? [PC A.27.(b)(i)] Yes _X_ No ❑ N/A ___ RMK# _7_

b. A copy of the current financial assurance mechanism, as set forth in OAC Rules 3745-55-43 and 3745-55-45 and as specified by the wording requirements of OAC Rule 3745-55-51 to update Section I of the permit application? [PC A.27.(b)(ii)] If yes, then: Yes _X_ No ❑ N/A ___ RMK#___

i. Was the copy of the financial assurance mechanism documentation submitted to the director in accordance with OAC Rules 3745-55-43 and 3745-55-45? [PC A.27.(b)(ii)] Yes _X_ No ❑ N/A ___ RMK#___

NOTE: The value of the financial assurance mechanism must reflect at least the current amount of the closure/post-closure cost estimate.

NOTE: During the life of the permit the facility may change the financial assurance mechanism as stated in OAC Rules 3745-55-43 and 3745-55-45.

c. A copy of the current liability mechanism as set forth in OAC Rule 3745-55-47 and as specified by the wording requirements of OAC Rule 3745-55-51 to update Section I of the permit application? [PC A.27.(b)(iii)] If yes, then: Yes _X_ No ❑ N/A ___ RMK#___

i. Was the copy of the liability mechanism documentation submitted to the director in accordance with OAC Rule 3745-55-47? [PC A.27.(b)(iii)] Yes _X_ No ❑ N/A ___ RMK#___

NOTE: During the life of the permit the facility may change the mechanism used to demonstrate liability coverage as stated in OAC Rule 3745-55-47.

NOTE: This information must be submitted in accordance with OAC Rule 3745-50-51.

36. Did the Permittee submit a new, complete version of the permit application to the Ohio EPA within 90 days after permit journalization and submit it as a Class 1A permit modification pursuant to OAC Rule 3745-50-51? [PC A.27.(c)] If yes, did it include: Yes ___ No _X_ N/A ___ RMK# _9_

a. Removal of all existing stricken language and specialized font text into standard font (unless otherwise noted in the permit)? [PC A.27.(c)] Yes _X_ No ___ N/A ___ RMK# _9_

b. A complete and updated table of contents and accurate tables, sections and references/citations? [PC A.27.(c)] Yes _X_ No ___ N/A ___ RMK# _9_

c. Incorporated information required by Permit Conditions B.27, K.9, J.2, and G.2? [PC A.27.(c)] Yes ___ No _X_ N/A ___ RMK# _9_

NOTE: ***Any changes to the permit application submitted with this updated version that are inconsistent with or not authorized by this final renewal permit must be clearly identified and follow the appropriate process outlined in OAC Rule 3745-50-51.***

WASTE MINIMIZATION REQUIREMENTS

37. Did the Permittee submit a waste minimization report describing the waste minimization program required by OAC Rules 3745-54-75(H), (I), and (J); 3745-54-73(B)(9); and 3745-52-20(B) at least once every 2 years and the provisions of OAC Rules 3745-54-75(H), (I), and (J); and 3745-54-73(B)(9) must be satisfied annually? [PC A.29.(a)]

Yes _X_ No ❑ N/A ___RMK#___

38. Did the Permittee submit the waste minimization report to Ohio EPA, OCAPP within 180 days of the effective date of this permit, and submit updates to this report biennially thereafter? [PC A.29.(b)]

Yes _X_ No ❑ N/A ___RMK#___

MODULE B – GENERAL FACILITY CONDITIONS

DESIGN AND OPERATION OF FACILITY

1. Does the Permittee design, construct, maintain, and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituent to air, soil, ground water or surface waters that could threaten human health or the environment? [PC B.1.(a)] — Yes _X_ No ❑ N/A ___ RMK#___

2. Does the Permittee only accept for storage, treatment, and/or disposal the hazardous waste codes specified in Part A of the permit application? [PC B.1.(b)] — Yes _X_ No ❑ N/A ___ RMK#___

3. Do all wastes meet all applicable land disposal restriction standards in accordance with OAC Chapter 3745-270, prior to disposal? [PC B.1.(b)] — Yes _X_ No ❑ N/A ___ RMK#___

4. Does the Permittee only accept waste, for the waste codes listed in Table B-1 and as found in Part A of the permit application, as residues from treatment by incineration, carbon regeneration (by thermal incineration), and wastewater treatment; as well as, any secondary residues such as soils and debris derived from the primary residues? [PC B.1.(b)(i)] — Yes _X_ No ❑ N/A ___ RMK#___

5. Does the Permittee only accept F027 waste as incineration residue that meets all applicable land disposal treatment standards as found in OAC Rule 3745-270-40 prior to acceptance? [PC B.1.(b)(ii)] — Yes _X_ No ❑ N/A__ RMK# _10_

6. Does the Permittee accept more than 235,000 tons of hazardous waste in any one calendar year from off-site sources limited facility wide and including all units? [PC B.1.(c)] — Yes ❑ No_X_ N/A ___ RMK#_11_

7. Has the Permittee solicited any liquid hazardous or non-hazardous waste generated off-site, for treatment, storage or disposal? [PC B.1.(d)] — Yes ❑ No_X_ N/A ___ RMK#___

NOTE: ***In the event that the Permittee inadvertently receives liquid hazardous or non-hazardous waste, the Permittee may store such waste until proper off-site treatment, storage or disposal can be accomplished. A good faith effort to expeditiously accomplish such off-site treatment, storage or disposal must be made. At the request of Ohio EPA, the Permittee must demonstrate to the satisfaction of Ohio EPA that such a good faith effort was made.***

NOTE: ***The Permittee is permitted to treat, store and dispose of incidental or extraneous free liquids that may be inadvertently received with solid phase hazardous or non-hazardous wastes that the Permittee is permitted to treat, store or dispose.***

WASTE ANALYSIS REQUIREMENTS

8. Before treating, storing, or disposing of any hazardous or non-hazardous waste, does the Permittee obtain a detailed chemical and physical analysis of a representative sample of the waste that contains, at a minimum, all the information necessary to treat, store, or dispose of the waste? [PC B.3.(a)] — Yes _X_ No ❑ N/A ___ RMK#___

9. Does the Permittee follow the procedures in the WAP found in Section C of the permit application, the WPR procedures as described in Section C of the permit application, and the terms and conditions of the permit? [PC B.3.(b)] — Yes _X_ No ❑ N/A ___ RMK#___

10. Did all WPR approvals expire on the last day of the 13th month from the date of approval by Ohio EPA, or the date of certification in accordance with WPR requirements by the generator of that waste? [PC B.3.(b)]. — Yes___No_X_N/A___ RMK#___

    If no, then did the Permittee obtain a letter from the waste generator certifying that either:

    a. The waste analysis has remained unchanged since the last approval? [PC B.3.(b)]. Or, — Yes _X_ No ❑ N/A ___ RMK#___

    b. That a new analysis provided by the generator or conducted by an independent laboratory shows no significant change in the waste composition or its characteristics? [PC B.3.(b)] — Yes _X_ No ❑ N/A ___ RMK#___

11. Did the letter in #10 above, or the new analysis become part of that specific WPR package? [PC B.3.(b)] — Yes _X_ No ❑ N/A ___ RMK#___

12. In the absence of certification, were all WPR's resubmitted to Ohio EPA for re-approval? [PC B.3.(b)] — Yes _X_ No ❑ N/A ___RMK#___

    a. Did the resubmitted WPR's include a new analysis provided by the waste generator, or conducted by an independent laboratory? [PC B.3.(b)] — Yes _X_ No ❑ N/A ___RMK#___

13. Did the Permittee verify the analysis of each waste stream annually or within the 60 days following the anniversary of the acceptance of the first shipment of the waste from the same generator? [PC B.3.(c)] If yes, then: — Yes _X_ No ❑ N/A ___RMK#___

    a. Was each waste stream verification of analysis completed in accordance with Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, EPA Publication SW-846, or an equivalent method approved by the director? [PC B.3.(c)] — Yes _X_ No ❑ N/A ___RMK#___

b. Did the Permittee, at a minimum, maintain proper functional instruments, use approved sampling and analytical methods, verify the validity of sampling and analytical procedures, and perform correct calculations? [PC B.3.(c)] Or: Yes _X_ No ❑ N/A ___RMK#___

c. If the Permittee used a contract laboratory, was the laboratory informed in writing, that it must operate under the waste analysis conditions set forth in the permit? [PC B.3.(c)] Yes _X_ No ❑ N/A ___RMK#___

Application For Acceptance Of Waste

14. For each hazardous waste stream, does the Permittee obtain from the generator a WPQ, as found in appendix C.1 of the permit application, before accepting waste for treatment, storage, and/or disposal? [PC B.3.(d)] Yes _X_ No ❑ N/A ___RMK#___

Fingerprint Analysis

15. Does the Permittee perform a fingerprint analysis on representative waste samples as specified in Section C of the permit application? [PC B.3.(e)]. If yes, then: Yes _X_ No ❑ N/A ___RMK#___

a. Does the Permittee compare the results of the fingerprint sampling program to the pre-acceptance analysis for the waste stream? [PC B.3.(e)] Yes _X_ No ❑ N/A ___RMK#___

b. Have any significant discrepancies been noted during the fingerprint analysis? If yes, then: Yes _X_No___N/A___RMK#_12_

i. Did the Permittee notify the generator? [PC B.3.(e)] Yes _X_ No ❑ N/A ___RMK#___

ii. If the discrepancy was not resolved within fifteen (15) days, then did the Permittee immediately submit to the director a letter describing the discrepancy, attempts to reconcile the discrepancy, and a copy of the manifest or shipping paper at issue? [PC B.3.(e)] Yes ___ No ❑ N/A_X_RMK#___

NOTE: ***Significant discrepancies in waste types are defined as obvious differences, which can be discovered by inspection or waste analysis such as a waste solvent substituted for waste acid, or toxic constituents not reported on the manifest or shipping paper [PC B.3.(e)(i)]. Significant discrepancies for quantity are, for bulk waste, variations greater than 10% in weight; and for batch waste, any variation in piece count, such as a discrepancy of 1 drum in a truck load [PC B.3.(e)(ii)].***

16. Does the Permittee analyze for the presence of free liquid in accordance with the correct SW-846 methods for free liquids? [PC B.3.(e)(iii)] If yes, then: Yes _X_ No ❑ N/A ___RMK#___

a. Does the Permittee prohibit the disposal of waste that fails the paint filter test? [PC B.3.(e)(iii)] Yes _X_ No ❑ N/A ___RMK#___

Bulk Wastes

17. Does the Permittee randomly sample and conduct a fingerprinting analysis of at least 10% of the bulk waste loads regardless of their origin, waste type, and/or WSID? [PC B.3.(f)] Yes _X_ No ❑ N/A ___RMK#___

18. Does the Permittee fingerprint at least every 10th bulk load received by the facility? [PC B.3.(f)] Yes _X_ No ❑ N/A ___RMK#___

19. Does fingerprinting of bulk loads also occur after a visual inspection whenever warranted or when there has been a change in the process generating that particular waste? [PC B.3.(f)] Yes _X_ No ❑ N/A ___RMK#___

NOTE: ***PC B.3.(f) applies to all incoming wastes, regardless of which treatment, storage, or disposal option is selected.***

20. Does the Permittee collect bulk waste samples as follows:

a. Two samples from the front, one from the middle, and two from the end of the Gondola railcar composited into one sample? [PC B.3.(f)(i)] Yes _X_ No ❑ N/A ___RMK#___

b. One sample per 25 tons of waste from each Hopper railroad car? [Condition B.3.(f)(ii)] Yes _X_ No ❑ N/A ___RMK#___

i. For waste defined as K061 EAF Dust in PC B.3.(h)(i), one additional sample per every seven tons of waste off-loaded as "batch"? [PC B.3.(f)(ii)] Yes _X_ No ❑ N/A ___RMK#___

c. One sample per 25 tons of waste from each intermodal container collected and composited together? [PC B.3.(f)(iii)] Yes _X_ No ❑ N/A ___RMK#___

d. For bulk waste received by truck, and defined as K061 EAF Dust, a minimum of 3 samples collected and composited together from at least 6-inches below the as-received surface of the waste material? [PC B.3.(f)(iv)] Yes _X_ No ❑ N/A ___RMK#___

Containerized Wastes

21. Does the Permittee sample and conduct a fingerprinting analysis on a composite sample of the containerized wastes as required by PC B.3.(g) of the permit? Yes_X_ No ❑ N/A ___RMK#___

22. Are all drums opened and inspected for free liquids prior to disposal? [PC B.3.(g)] Yes _X_ No ❑ N/A ___RMK#___

Wastes Treated By Chemical Stabilization

23. Prior to accepting a waste for stabilization and submitting a WPR form to Ohio EPA for approval, does the Permittee conduct or obtain a pre-acceptance analysis for such waste? [PC B.3.(h)(i)] Yes _X_ No ❑ N/A ___RMK#___

24. Does the Permittee submit an analytical report with the WPR package to Ohio EPA containing pre-acceptance analysis? [PC B.3.(h)(i)] Yes _X_ No ❑ N/A ___RMK#___

25. Except as provided in PC B.3.(h)(iii), does the Permittee test and document the results of each waste stream processed through the SCB to determine if the treated waste meets the applicable treatment standards? [PC B.3.(h)(ii)] Yes _X_ No ❑ N/A ___RMK#___

NOTE: ***The PC B.3.(h)(ii) requirement above does not apply if:***

a. ***The waste is to be further treated or disposed of off-site; or,***

b. ***The same waste code, having the same WSID from the same generator is processed through the same treatment units and under the same operating conditions. [PC B.3.(h)(ii)]***

If (b) is true, then it shall be so documented in the facility's operating records and only 10% of the subsequently treated loads are to be tested for the parameters specified in the WAP, and the manner that they would otherwise be required to be tested by applicable rules and regulations. [PC B.3.(h)(ii)]

26. Is the Permittee following the sampling frequency identified in the question above until valid test results have been obtained indicating that the Permittee's stabilization procedures are effective to comply with land-ban regulations? [PC B.3.(h)(iii)]. If yes, then: Yes _X_ No ❑ N/A ___RMK#___

a. Did the Permittee notify Ohio EPA of these findings? [PC B.3.(h)(iii)]. Yes _X_ No ❑ N/A ___RMK#___

b. At such time, and after notification to Ohio EPA, has the Permittee complied with the following:

i. For each generator, does the Permittee test the waste, or an extract of the waste or treatment residue using the TCLP or other method according to the frequency specified in PC B.3.(h)(iii)(a)] Yes _X_ No ❑ N/A ___RMK#___

ii. Is the frequency of the TCLP or other testing conducted according to the following frequency in compliance with PC B.3.(h)(iii)(b)? Yes _X_ No ❑ N/A ___RMK#___

27. Prior to land filling the acid subcategory of D002 wastes, does the Permittee ensure that the pH of a 10% slurry of the deactivated waste is between 9.0 and 12.5? [PC B.3.(i)] Yes _X_ No ❑ N/A ___RMK#___

NOTE: ***Adjustments to the pH of deactivated waste can be made by blending alkaline materials with the waste in the chemical stabilization process. [PC B.3.(i)]***

K061 EAF Dust Sampling Requirements

28. Does the Permittee test a representative sample of the treated K061 EAF Dust waste from the mixing container used in the full scale treatment process, or TCLP extract of the full scale treated waste container according to the frequency specified in PC B.3.(k)? [PC B.3.(j)] Yes _X_ No ❑ N/A ___RMK#___

Testing Frequency And Procedures For KO61 EAF Dust

29. Does the Permittee perform both bench and field experimental testing of waste batches in order to develop an effective mix design? [PC B.3.(k)(i)] Yes _X_ No ❑ N/A ___RMK#___

NOTE: ***Any waste batch treated experimentally must be treated successfully, as demonstrated by analysis results meeting the LDR standards in OAC Rule 3745-270-40, prior to land disposal of that waste batch. [PC B.3.(k)(i)]***

30. Does the Permittee establish an "initial qualification" for each mix design for which qualification is sought? [PC B.3.(k)(ii)] Yes _X_ No ❑ N/A ___RMK#___

31. Is "initial qualification" established by testing a sequence of either 5, 10, or 20 consecutive batches? [PC B.3.(k)(ii)] Yes _X_ No ❑ N/A ___RMK#___

32. Has each batch been treated successfully, as demonstrated by analysis results meeting the LDR standards in OAC Rule 3745-270-40 required for land disposal of that waste? [PC B.3.(k)(ii)] Yes _X_ No ❑ N/A ___RMK#___

33. In the event that a sequence of at least 5 passing results cannot be achieved, then does the Permittee test every batch until a sequence of at least 5 consecutive passing results is achieved? [PC B.3.(k)(ii)] Yes _X_ No ❑ N/A ___RMK#___

34. Once "initial qualification" for a mix design has been achieved, does the Permittee assign a testing frequency category (A, B, or C) based on the number of batches successfully tested? [PC B.3.(k)(iii)] Yes _X_ No ❑ N/A ___RMK#___

35. For batches qualifying as Category A, did the Permittee successfully treat a sequence of 20 qualification batches; and thereafter, test 1 batch in every 20 treated? [PC B.3.(k)(iii)(a)] — Yes _X_ No ❑ N/A ___ RMK#___

36. For batches qualifying as Category B, did the Permittee successfully treat a sequence of 10 qualification batches; and thereafter, test 1 batch in every 10 treated? [PC B.3.(k)(iii)(b)] — Yes _X_ No ❑ N/A ___ RMK#___

37. For batches qualifying as Category C, did the Permittee successfully treat a sequence of 5 qualification batches; and thereafter, test 1 batch in every 5 treated? [PC B.3.(k)(iii)(c)] — Yes _X_ No ❑ N/A ___ RMK#___

NOTE: ***For each sequence of 5, 10, or 20 "on-specification" batches treated, it shall be acceptable to collect a sample from the "on-specification" batch immediately preceding or immediately following the numerical batch in the sequential count specified to be tested. [PC B.3.(k)(iii)]***

38. After a mix design is qualified for Category C, and in the event that the Permittee elected to continue initial qualification for Category B and a failure occurs, does the Permittee re-qualify the mix design under PC B.3.(k)(iv), Category C? [PC B.3.(k)(ii)(a)] — Yes _X_ No ❑ N/A ___ RMK#___

39. After a mix design is qualified for Category A, and in the event that the Permittee elected to continue initial qualification for Category B and a failure occurs, does the Permittee re-qualify the mix design under PC B.3.(k)(iv), Category C, and/or PC B.3.(k)(v), Category B? [PC B.3.(k)(ii)(b)] — Yes _X_ No ❑ N/A ___ RMK#___

NOTE: ***Initial qualification (or re-qualification) batches may be added to the testing sequence to qualify for Category B (after qualification for Category C) or Category A (after qualification for Category B) after initial qualification (or re-qualification) has been completed, including subsequent successful testing performed in accordance with PC B.3.(k)(iii)(a), B.3.(k)(iii)(b), or B.3.(k)(iii)(c), as long as they are sequential, i.e., not separated by intermittent failures of one or more batches of "on-specification" waste. [PC B.3.(k)(iii)]***

Re-qualification Testing

40. For batches tested that do not meet the LDR standards in OAC Rule 3745-270-40 required for land disposal of that waste, did the Permittee deem those batches failures and record them as such? [PC B.3.(k)(iv)] — Yes _X_ No ❑ N/A ___ RMK#___

    a. If yes, then did the Permittee suspend the testing frequency specified in PC B.3.(k)(iii) for the waste treated by that mix design, and subject that waste to re-qualification? [PC B.3.(k)(iv)] — Yes _X_ No ❑ N/A ___ RMK#___

41. Did the Permittee re-test all waste batches treated by the failure mix design (that had not been disposed of) until a sequence of at least 3 consecutive "on-specification" batches are treated successfully? [PC B.3.(k)(iv)] Yes _X_ No ❑ N/A ___RMK#___

a. If so, then once "re-qualification" for Category C has been achieved, did the Permittee resume the testing frequency requirements of PC B.3.(k)(iii)(c)? [PC B.3.(k)(iv)] Yes _X_ No ❑ N/A ___RMK#___

NOTE: ***Re-qualification testing may be continued for waste batches that were previously qualified in accordance with PC B.3.(k)(iii) for either Category B or Category A at the time of the failure. [PCB.3.(k)(v)]***

42. When re-qualification testing to return to Category B, did the Permittee treat a sequence of at least 5 consecutive on-specification batches successfully? [PC B.3.(k)(v)(a)] Yes _X_ No ❑ N/A ___RMK#___

a. If so, then once re-qualification for Category B was achieved, did the Permittee resume the testing frequency requirements of PC B.3.(k)(iii)(b)? [PC B.3.(k)(v)(a)] Yes _X_ No ❑ N/A ___RMK#___

43. When re-qualification testing to return to Category A, did the Permittee treat a sequence of at least 10 consecutive on-specification batches successfully? [PC B.3.(k)(v)(b)] Yes _X_ No ❑ N/A ___RMK#___

a. If so, then once re-qualification for Category A was achieved, did the Permittee resume the testing frequency requirements of PC B.3.(k)(iii)(a)? [PC B.3.(k)(v)(b)] Yes _X_ No ❑ N/A ___RMK#___

SECURITY REQUIREMENTS

44. Is the Permittee in compliance with the security provisions of OAC Rule 3745-54-14(B)(2) and (C) and Section F of the permit application? [PC B.4.(a)] Yes _X_ No ❑ N/A ___RMK#___

45. Does the Permittee provide a 24-hour surveillance system, which monitors and controls entry onto the active portion of the facility? [PC B.4.(b)] Yes _X_ No ❑ N/A ___RMK#___

46. Has the Permittee provided a fence that surrounds the facility? [PC B.4.(c)] Yes _X_ No ❑ N/A ___RMK#___

47. Has a new or replacement fence been installed after the effective date of the permit? If yes, then: Yes _X_ No ❑ N/A ___RMK#___

a. Is the fence at least a 6-foot tall, chain-linked fence topped with 3 strands of barbed wire? [PC B.4.(c)] Yes _X_ No ❑ N/A ___RMK#___

48. Is internal security to the active disposal cell(s) always maintained within fences or gates? [PC B.4.(c)] — Yes _X_ No ❑ N/A ___ RMK#___

49. Has the Permittee posted warning signs with the legend, "Danger–Unauthorized Personnel Keep Out" at each entry gate and at approximately 200-foot intervals along the perimeter fence? [PC B.4.(d)] — Yes _X_ No ❑ N/A ___ RMK#___

50. Has the Permittee documented all known attempts of unauthorized entry by persons or livestock onto the active portion of the facility? [PC B.4.(e)] — Yes _X_ No ❑ N/A ___ RMK#___

GENERAL INSPECTION REQUIREMENTS

51. Does the Permittee follow the procedures and schedules set forth in Section F of the permit application? [PC B.5.] — Yes _X_ No___ N/A ___ RMK#__

52. Does the Permittee remedy any deterioration or malfunction discovered by an inspection as required by OAC Rule 3745-54-15(C)? [PC B.5.] — Yes _X_ No ❑ N/A ___ RMK#___

53. Are records of inspections kept for a minimum of three years from the date of inspection in the facility operating record as required by OAC Rule 3745-54-73? [PC B.5.] — Yes _X_ No ❑ N/A ___ RMK#___

54. Does the Permittee require the inspectors to sign and print their names on the inspection checklists after indicating the status of the items inspected? [PC B.5.(a)] — Yes _X_ No ___ N/A ___ RMK#___

55. Does the Permittee ensure that items that are not inspected are marked with "NI" on the checklist? [PC B.5.(a)] — Yes ___ No _X_ N/A ___ RMK# 13

56. Are records of inspections kept as required by OAC Rule 3745-54-15(D), the terms and conditions of this permit, and the permit application? [PC B.5.(b)] — Yes _X_ No ❑ N/A ___ RMK#___

Scale Inspections

57. Does the Permittee inspect each scale and the surrounding area on a weekly basis? [PC B.5.(c)(i)] — Yes _X_ No ❑ N/A ___ RMK#___

58. Does the Permittee monitor and inspect each scale and the surrounding area for structural integrity, cleanliness, and to assure that there are no obstacles or other blockages? [PC B.5.(c)(ii)] — Yes _X_ No ❑ N/A ___ RMK#___

59. Are any structural damage or obstacles identified during inspections that would affect the accuracy of the scale readings, repaired or removed prior to the next use of the affected scale? [PC B.5.(c)(ii)] — Yes _X_ No ❑ N/A ___ RMK#___

60. Does the Permittee check service records of all scale equipment? [PC B.5.(c)(iii)] Yes _X_ No ❑ N/A ___RMK#___

61. Does the Permittee perform testing and verification of the scales on a semi-annual basis or as required by the equipment manufacturer? [PC B.5.(c)(iii)] Yes _X_ No ❑ N/A ___RMK#___

Gates, Fences, Surveillance, and Radio Equipment

62. Does the Permittee inspect the facility's gates, fences, surveillance, and radio equipment on a weekly basis? [PC B.5.(d)(i)] Yes _X_ No ❑ N/A ___RMK#___

63. Does the Permittee ensure that none of the secondary gates are left unattended unless those gates are locked? [PC B.5.(d)(ii)] Yes _X_ No ❑ N/A ___RMK#___

64. Are all main gates monitored during regular business hours by persons trained in security procedures? [PC B.5.(d)(ii)] Yes_X_ No ❑ N/A ___RMK#___

65. During non-operational hours, does the Permittee provide proper surveillance to monitor and control entry onto the active portion of the facility, as required by OAC Rule 3745-54-14 (B)? [PC B.5.(d)(ii)] Yes _X_ No ❑ N/A ___RMK#___

66. Does the Permittee inspect the facility's two-way radio communications system for proper operation and required maintenance, on at least a weekly basis, including an evaluation of service records? [PC B.5.(d)(iii)] Yes _X_ No ❑ N/A ___RMK#___

Container Storage Area Inspections

67. Does the Permittee inspect the container storage area(s) on a weekly basis and after rainfall events (2 or more inches of rainfall in 8 hours)? [PC B.5.(e)]. Yes _X_ No ❑ N/A ___RMK#___

a. Does the inspection include an evaluation for spilled material, leaking containers, and for deterioration of containers and the containment system? [PC B.5.(e)] Yes _X_ No ❑ N/A ___RMK#___

b. Does the inspection include an assessment of the integrity of the pad and curbing? [PC B.5.(e)] Yes _X_ No ❑ N/A ___RMK#___

Tank Storage Area Inspections

68. Does the Permittee inspect all tank storage areas on a weekly basis, and after a rainfall event (≥2" of rainfall in 8 hours)? [PC B.5.(f)(i)] Yes _X_ No ___N/A ___ RMK#___

69. Does the Permittee inspect once each operating day, overfill control equipment, monitoring equipment, drainage system, and tank level indicators? [PC B.5.(f)(ii)] Yes _X_ No ❑ N/A ___RMK#___

70. Does the Permittee inspect at least once each operating day the above ground portions of each tank system to detect corrosion or releases of waste? [PC B.5.(f)(iii)] Yes _X_ No ❑ N/A ___RMK#___

71. Does the Permittee inspect at least once each operating day storage records and filling logs on each tank for completeness and accuracy, and all data gathered from monitoring equipment and leak detection equipment to ensure that all tanks are being operated according to their designated specifications? [PC B.5.(f)(iv)] Yes _X_ No ❑ N/A ___RMK#___

72. Does the Permittee inspect at least once each operating day all tank construction materials, including piping, valves, seams, and connections for signs of leakage, corrosion, or structural deterioration? [PC B.5.(f)(v)] Yes _X_ No ❑ N/A ___RMK#___

73. Does the Permittee inspect at least once each operating day all of the areas immediately surrounding the externally accessible portion of each tank (i.e., the tank secondary containment structure) for signs of leakage, corrosion, indications of releases, or any other problems)? [PC B.5.()(vi)] Yes _X_ No ❑ N/A ___RMK#___

SCB Inspections

74. Does the Permittee inspect on a weekly basis all processing and waste handling equipment for proper operation and structural integrity? [PC B.5.(g)(i)] Yes _X_ No ❑ N/A ___RMK#___

75. Does the Permittee inspect on a weekly basis the SCB for spillage and for potentially unsafe conditions including the lack of safety guards and shields in key work locations? [PC B.5.(g)(ii)] Yes _X_ No ❑ N/A ___RMK#___

76. Does the Permittee inspect on a weekly basis, and after a rainfall event (2 or more inches of rainfall in eight hours) the SCB and all outside unloading pads/aprons? [PC B.5.(g)(iv)] Yes _X_ No ❑ N/A ___RMK#___

77. Does the Permittee inspect on a weekly basis for deterioration, malfunction, or improper operation of run-on and run-off control systems? [PC B.5.(g)(v)] Yes _X_ No ❑ N/A ___RMK#___

78. Does the Permittee inspect weekly for the presence of leachate in, and the proper functioning of, the leachate collection and removal systems and leak detection systems? [PC B.5.(g)(vi)] Yes _X_ No ❑ N/A ___RMK#___

79. Does the Permittee inspect daily all sumps located in the SCB for the presence of waste and/or liquid accumulation? [PC B.5.(g)(vii)] Yes _X_ No ❑ N/A ___ RMK#___

80. Does the Permittee inspect at least twice per year, all concrete slab surfaces for cracks, deterioration of chemical resistance, and water tightness? [PC B.5.(g)(viii)] Yes _X_ No ❑ N/A ___ RMK#___

81. Does the Permittee inspect at least twice per year, the steel wearing surfaces of the Campaign Bin for significant damage or deterioration? [PC B.5.(g)(ix)] Yes _X_ No ❑ N/A ___ RMK#___

Landfill Area Inspections

82. During the construction of the landfill cell and installation of liners and cover system, did the Permittee inspect the liners and cover system for uniformity, damage, and imperfections? [PC B.5.(h)(i)] Yes _X_ No ❑ N/A ___ RMK#___

83. During construction, did the Permittee inspect and test earthen and synthetic liner components? [PC B.5.(h)(ii)] Yes _X_ No ❑ N/A ___ RMK#___

84. Have all aspects of liner construction been inspected for conformance with construction specification? [PC B.5.(h)(ii)] Yes _X_ No ❑ N/A ___ RMK#___

85. During construction of the landfill cell, did the Permittee inspect the side slopes, and base of the landfill cell for imperfections? [PC B.5.(h)(iii)] Yes _X_ No ❑ N/A ___ RMK#___

86. Does the Permittee monitor and inspect construction of each segregated subcell to ensure that each meets the specification prior to using the subcell for disposal of waste? [PC B.5.(h)(iv)] Yes _X_ No ❑ N/A ___ RMK#___

87. Does the Permittee inspect the overall appearance of the active portion of the landfill on a weekly basis and after rainfall events? [PC B.5.(h)(v)]. If yes, then: Yes _X_ No ❑ N/A ___ RMK#___

    a. Were pockets of run-on water or exposed containers observed? If yes, then: Yes _X_ No___ N/A ___ RMK#___

    b. Were these observations noted on the inspection checklist? [PC B.5.(h)(v)] Yes _X_ No ❑ N/A ___ RMK#___

88. Does the Permittee inspect the active portion of the landfill on a weekly basis and after rainfall events to detect deterioration, malfunction, or improper operation of run-on diversion and run-off control systems? [PC B.5.(h)(vi)] Yes _X_ No ❑ N/A ___ RMK#___

89. Does the Permittee inspect the wind dispersal control systems, intermediate cover procedures, dust, conditions and controls on a daily basis and after rainfall events for proper functioning? [PC B.5.(h)(vii)] Yes _X_ No ❑ N/A ___RMK#___

90. Does the Permittee inspect the leachate collection and removal system weekly and after rainfall events to detect the presence of leachate and proper functioning? [PC B.5.(h)(viii)] Yes _X_ No ❑ N/A ___RMK#___

Safety Equipment Inspections

91. Does the Permittee inspect safety equipment, emergency communications, and spill control equipment as needed? [PC B.5.(i)(i)] Yes _X_ No ___ N/A ___ RMK#___

92. Does the Permittee inspect all fire fighting equipment as needed to assure that equipment is in place, unobstructed, and operational? [PC B.5.(i)(ii)] Yes _X_ No ❑ N/A ___RMK#___

NOTE: ***Fire fighting equipment includes foam-water monitors, fire extinguishers, the fire truck, portable foam-water unit, and the alarm horn. [PC B.5.(i)(ii)]***

93. Does the Permittee inspect emergency safety gear, respirators, PPE, and first aid supplies as needed to assure that each piece of equipment is in place, unobstructed, and that all contents are readily available? [PC B.5.(i)(iii)] Yes _X_ No ❑ N/A ___RMK#___

94. Does the Permittee ensure that all expendable safety equipment is replaced after use in a timely manner? [PC B.5.(i)(iv)] Yes _X_ No ❑ N/A ___RMK#___

Miscellaneous Inspections

NOTE: ***The following key areas of the facility not covered under the inspection program for a specific process must be inspected on a weekly basis and after a rainfall event. [PC B.5.(j)]***

95. Does the Permittee inspect the decontamination units and areas where they are used for spillage, physical obstruction, integrity of temporary containment devices, cleanliness, and general operating condition of valves, hoses, motor, and safety valves? [PC B.5.(j)(i)] Yes _X_ No ❑ N/A ___RMK#___

96. Does the Permittee inspect the run-on water diversion or collection facilities for overfill, integrity of containment devices, general conditions, and the presence of leaks? [PC B.5.(j)(ii)] Yes _X_ No ❑ N/A ___RMK#___

97. Are facility roads inspected to ensure that directional signs and the presence of hazardous waste spills are clearly visible, and general roadway integrity is maintained to ensure safe movement of materials through the facility? [PC B.5.(j)(iii)] — Yes _X_ No ❑ N/A ___ RMK#___

98. Has the facility's run-on/run-off control drainage system for the entire site been assessed as to its operational integrity, including the presence of deterioration, damage from animal burrows, and physical obstructions to verify they are functioning adequately? [PC B.5.(j)(iv)] — Yes _X_ No ❑ N/A ___ RMK#___

99. Has the facility's groundwater monitoring well system been inspected for damage and degradation, presence of physical obstruction, and overall integrity? [PC B.5.(j)(v)] — Yes _X_ No ❑ N/A ___ RMK#___

100. Are all monitoring wells inspected to verify that they are locked when not in use? [PC B.5.(j)(v)] — Yes _X_ No ❑ N/A ___ RMK#___

PERSONNEL TRAINING REQUIREMENTS

101. Has the Permittee conducted personnel training, as required by OAC Rule 3745-54-16, and containing at least the elements set forth in Section H of the Permit application? [PC B.6.(a)] If yes, then: — Yes _X_ No ❑ N/A ___ RMK#___

a. Has the Permittee maintained training documents and records required by OAC Rule 3745-54-16(D) and (E)? [PC B.6.(a)] — Yes _X_ No ❑ N/A ___ RMK#___

102. Is the facility's personnel training program directed by a person trained in hazardous waste management procedures? [PC B.6.(b)] — Yes _X_ No ❑ N/A ___ RMK#___

103. Does the facility's personnel training program include instruction in waste management procedures and contingency plan implementation? [PC B.6.(b)] — Yes _X_ No ❑ N/A ___ RMK#___

104. Does the Permittee complete a program of classroom instruction or on-the-job training for all personnel that teaches them to perform their duties in compliance with the requirements of the Ohio hazardous waste rules? [PC B.6.(b)(i)] — Yes ___ No _X_ N/A ___ RMK# 14

105. Is the personnel training program designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, equipment, and systems? [PC B.6.(b)(ii)]. ***Including:*** — Yes _X_ No ❑ N/A ___ RMK#___

a. Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment? [PC B.6.(b)(ii)(a)] Yes _X_ No ❑ N/A ___ RMK#___

b. Key parameters for automatic waste feed cut-off systems? [PC B.6.(b)(ii)(b)] Yes _X_ No ❑ N/A ___ RMK#___

c. Communications or alarm systems? [PC B.6.(b)(ii)(c)] Yes _X_ No ❑ N/A ___ RMK#___

d. Response to fire or explosions? [PC B.6.(b)(ii)(d)] Yes _X_ No ❑ N/A ___ RMK#___

e. Response to groundwater contamination incidents? [PC B.6.(b)(ii)(e)] Yes _X_ No ❑ N/A ___ RMK#___

f. Shutdown of operations? [PC B.6.(b)(ii)(f)] Yes _X_ No ❑ N/A ___ RMK#___

106. Have facility personnel successfully completed the appropriate training program(s) within 6 months after the date of their employment, assignment to the facility or to a new position, whichever is later? [PC B.6.(b)(iii)] Yes _X_ No ❑ N/A ___ RMK#___

107. Does the Permittee ensure that employees do not work in unsupervised positions involving management of hazardous waste until they have successfully completed the training program specified in the approved application? [PC B.6.(b)(iii)] Yes _X_ No ❑ N/A ___ RMK#___

108. Does the Permittee conduct an annual training review for all facility personnel as specified in the approved application? [PC B.6.(b)(iv)] Yes _X_ No ❑ N/A ___ RMK#___

NOTE: ***This program may be revised and updated by the Permittee, as appropriate. [PC B.6.(iv)]***

109. Does the Permittee maintain a written job description for each position, and a record of the individuals employed in each of those positions? [PC B.6.(b)(v)] Yes _X_ No ❑ N/A ___ RMK#___

a. Do the above job descriptions include the requisite skill, education, or other qualifications and duties of employees assigned to each position? [PC B.6.(b)(v)] Yes _X_ No ❑ N/A ___ RMK#___

110. Does the Permittee maintain training records of current personnel as part of the operating record, until closure of the facility? [PC B.6.(b)(vi)] Yes _X_ No ❑ N/A ___ RMK#___

111. Does the Permittee maintain training records for former employees for 3 years from the date the employee last worked at the facility? [PC B.6.(b)(vi)] Yes _X_ No ❑ N/A ___ RMK#___

REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTES

112. Does the Permittee comply with the requirements of OAC Rule 3745-54-17 and Section F of the permit application for handling ignitable, reactive, and incompatible wastes? [PC B.7.(a)] — Yes _X_ No ❑ N/A ___ RMK#____

113. Does the Permittee provide electrical grounding for all tanks, containers, and transport vehicles during all operations involving the handling of ignitable or reactive waste? [PC B.7.(b)] — Yes _X_ No ❑ N/A ___ RMK#____

114. Does the Permittee provide and require the use of spark proof tools during all operations that involve the handling of ignitable or reactive wastes? [PC B.7.(c)] — Yes _X_ No ❑ N/A ___ RMK#____

115. Does the Permittee take precautions as to prevent accidental ignition or reaction of ignitable or reactive wastes? [PC B.7.(d)] — Yes _X_ No ❑ N/A ___ RMK#____

116. Are ignitable and reactive wastes separated and protected from sources of ignition or reaction? [PC B.7.(d)] — Yes _X_ No ❑ N/A ___ RMK#____

117. While ignitable, reactive, or incompatible waste is managed, does the Permittee prohibit smoking and open flame in that area? [PC B.7.(d)] — Yes _X_ No ❑ N/A ___ RMK#____

118. Are appropriate signs posted wherever ignitable, reactive, or incompatible wastes are managed? [PC B.7.(d)] — Yes _X_ No ❑ N/A ___ RMK#____

119. Where applicable, does all wiring and electrical equipment at the facility meet the NFPA standards for hazardous locations? [PC B.7.(e)] — Yes _X_ No ❑ N/A ___ RMK#____

NOTE: ***See NFPA, "National Electric Code," 2002 Edition, Chapter 5, Special Occupancies, Articles 500-503, and any subsequent updates.***

120. Does the Permittee take precautions as to prevent reactions that:

a. Generate extreme heat or pressure, fire or explosions, or violent reactions? [PC B.7.(f)(i)] — Yes _X_ No ❑ N/A ___ RMK#____

b. Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities as to threaten human health or the environment? [PC B.7.(f)(ii)] — Yes _X_ No ❑ N/A ___ RMK#____

c. Produce uncontrolled flammable fumes or gases in sufficient quantities as to pose a risk of fire or explosions? [PC B.7.(f)(iii)] — Yes _X_ No ❑ N/A ___ RMK#____

d. Damage structural integrity of the device or the facility? [PC B.7.(f)(iv)] — Yes _X_ No ❑ N/A ___ RMK#____

e. Through other like means, threatens human health and the environment? [PC B.7.(f)(v)] Yes _X_ No ❑ N/A ___RMK#____

f. When required to comply with the PC B.7.(a) has the Permittee documented such compliance? [PC B.7.(f)(vi)] Yes _X_ No ❑ N/A ___RMK#____

NOTE: ***This documentation may be based on references to published scientific or engineering literature, trial tests (e.g., bench scale or pilot scale test), waste analysis (as specified in OAC Rule 3745-54-13), or the results of the treatment of similar wastes by similar treatment processes and under similar operating conditions.***

121. Has the Permittee submitted the documentation required above, to Ohio EPA as part of the WPR package, as appropriate? [PC B.7.(f)(vi)] Yes _X_ No ❑ N/A ___RMK#____

REQUIRED EQUIPMENT

122. Does the Permittee maintain all the equipment required by OAC Rule 3745-54-32 and set forth in the contingency plan in Section G of the permit application at the facility? [PC B.9.(a)] Yes _X_ No ❑ N/A ___RMK#____

123. Has each permanent building at the facility (lab, trailers, office, storage building, process plant) been equipped with a minimum of one or more of the following communication devices: telephone, two-way radio, paging system, and/or alarm system? [PC B.9.(a)(i)] Yes __ No _X_ N/A ___ RMK# 15__

124. Does the Permittee maintain in each building an accessible, manual audible alarm warning system? [PC B.9.(a)(ii)] Yes _X_ No ❑ N/A ___RMK#____

125. Do personnel involved in the treatment, storage, and landfill operation have, immediately accessible, a hand-held or vehicle mounted two-way radio that can be used to contact the area supervisor and/or Emergency Coordinator? [PC B.9.(a)(ii)] Yes _X_ No ❑ N/A ___RMK#____

126. Does the Permittee maintain on-site a vehicle with a two-way radio that is dedicated for emergencies, fires, and spill response? [PC B.9.(a)(iii)] If yes, then: Yes _X_ No ❑ N/A ___RMK#____

a. Has the vehicle been equipped with spill control and first aid materials? [PC B.9.(a)(iii)] Yes _X_ No ❑ N/A ___RMK#____

127. Have fire extinguishers, and fire control equipment been installed and located in appropriate work areas? [PC B.9.(a)(iv)] Yes _X_ No ❑ N/A ___RMK#____

128. Have portable fire extinguishers been located in areas of fire hazard within facility buildings, and on each piece of heavy equipment used in the disposal area? [PC B.9.(a)(iv)] Yes _X_ No ❑ N/A ___RMK#____

129. Does the emergency coordinator have a two-way radio, mobile phone, or pager at his/her disposal at times while on-site and/or on call? [PC B.9.(a)(v)] Yes _X_ No ❑ N/A ___RMK#____

130. Does the Permittee maintain three fire hydrants connected to a public water main at adequate volumes and pressures **or** have they constructed and maintained a fire protection system dictated by NFPA guidelines? [PC B.9.(a)(vi)] Yes _X_ No ❑ N/A ___RMK#____

131. Does the Permittee provide and maintain a power back-up to the emergency communication and alarm systems in the event of an electric power failure? [PC B.9.(a)(vii)] Yes _X_ No ❑ N/A ___RMK#____

FACILITY DECONTAMINATION STATION AND EQUIPMENT

132. Does the Permittee operate and maintain at least 2 portable truck wash units for decontamination? [PC B.9.(b)(i)] Yes _X_ No ❑ N/A ___RMK#____

133. Does the Permittee collect water used in the decontamination of trucks and/or waste handling equipment? [PC B.9.(b)(ii)]. If yes, then: Yes _X_ No ❑ N/A ___RMK#____

a. Does the Permittee determine if such wash waters are hazardous waste in accordance with OAC Rule 3745-51-11 and manage the liquid appropriately? [PC B.9.(b)(ii)] Yes _X_ No ❑ N/A ___RMK#____

TESTING AND MAINTENANCE OF EQUIPMENT

134. Does the Permittee inspect, test, and maintain equipment required in PC B.9. as necessary to assure proper operation in time of emergency? [PC B.10] Yes _X_ No ❑ N/A ___RMK#____

ACCESS TO COMMUNICATION OR ALARM SYSTEM

135. Does the Permittee maintain access to the communications and alarm systems, required by OAC Rule 3745-54-34, Section G of the Permit, and the terms and conditions of the permit? [PC B.11.(a) Yes _X_ No ❑ N/A ___RMK#____

136. Does the Permittee have internal communication and alarm system equipment available within 70-feet of each active storage, process, or disposal unit? [PC B.11.(b)] Yes _X_ No ❑ N/A ___RMK#____

137. Does the Permittee ensure that all personnel involved in the management of hazardous waste have access to an internal alarm or emergency communication device? [PC B.11.(b)] Yes _X_ No ❑ N/A ___RMK#____

138. Has the Permittee installed devices capable of summoning emergency assistance from off-site sources such as local fire or police departments? [PC B.11.(b)] Yes _X_ No ❑ N/A ___RMK#____

REQUIRED AISLE SPACE

139. Does the Permittee maintain aisle space to assure unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility? [PC B.12.(a)] — Yes _X_ No ❑ N/A ___ RMK#___

140. Has the Permittee constructed and maintained an access road of sufficient width to accommodate a fire truck between Cell M and the tank farms/container storage areas? [PC B.12.(b)] — Yes _X_ No ❑ N/A ___ RMK#___

ARRANGEMENTS WITH LOCAL AUTHORITIES

141. Has the Permittee made arrangements to familiarize the emergency response agencies likely to respond in an emergency with the location and layout of the facility, properties of hazardous waste managed and associated hazards, places where personnel normally would be working, entrances, and possible evacuation routes? [PC B.13.(a)(i)] — Yes _X_ No ❑ N/A ___ RMK#___

142. Has the Permittee made arrangements with Ohio EPA emergency response teams, emergency response contractors, and equipment suppliers? [PC B.13.(a)(ii)] — Yes _X_ No ❑ N/A ___ RMK#___

143. Has the Permittee made arrangements to familiarize local hospitals 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? [PC B.13.(a)(iii)] — Yes _X_ No ❑ N/A ___ RMK#___

144. Has the Permittee made agreements designating primary emergency authority to a specific police and fire department and agreements with others to provide support when more than one emergency authority responds to an emergency? [PC B.13.(a)(iv)] — Yes _X_ No ❑ N/A ___ RMK#___

145. Has a state or local agency declined to enter into an agreement or arrangement as set forth in OAC Rule 3745-54-37(A)? If yes, then: — Yes ___ No _X_ N/A ___ RMK#___

a. Has the Permittee documented the refusal in the operating record as required by OAC Rule 3745-54-37(B)? [PC B.13.(b)] — Yes ___ No ❑ N/A _X_ RMK#___

IMPLEMENTATION OF CONTINGENCY PLAN

146. Has there been a fire, explosion, or release of hazardous waste/constituents, or another emergency situation since the date of the last CEI inspection? [PC B.14.] If so, then: — Yes _X_ No ___ N/A ___ RMK# _3_

a. Did the Permittee immediately implement the approved contingency plan? [PC B.14.] Yes _X_ No ___ N/A ___ RMK# ___

147. Did the emergency coordinator provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that resulted from a release, fire, or explosion? [PC B.16.(a)] Yes _X_ No ___ N/A ___ RMK# ___

148. Did the Permittee evaluate all liquid or solid material resulting from fire, explosion, released material, or emergency response material and by products to determine if the material is hazardous and handle the material appropriately? [PC B.16.(b)] Yes _X_ No ___ N/A ___ RMK# ___

NOTE: ***The material must be collected and managed as hazardous waste unless the Permittee can demonstrate that such waste is not hazardous in accordance with OAC Rule 3745-51-03(c) and (d). [PC B.16.(b)]***

REVIEW AND AMENDMENT OF CONTINGENCY PLAN

149. Does the Permittee review the approved contingency plan at least annually and upon the occurrence of any event listed in OAC Rule 3745-54-54 and amend the approved contingency plan as required by OAC Rule 3745-54-54 in accordance with OAC Rule 3745-50-51? [PC B.17.] Yes _X_ No ❑ N/A __ RMK#_16_

COPIES OF THE CONTINGENCY PLAN

150. Is the Permittee maintaining copies and all revisions to the contingency plan at the facility? [PC B.18.(a)] Yes _X_ No ❑ N/A ___RMK#___

151. Has the Permittee submitted copies of the contingency plan to all local emergency response agencies? [PC B.18.(b)] Yes _X_ No ❑ N/A ___RMK#___

152. Has the Permittee notified the emergency response agencies, in writing, within 10 days of the effective date of any amendment, revision, or modification to the contingency plan? [PC B.18.(b)] Yes _X_ No ❑ N/A ___RMK#___

153. Has the Permittee submitted a copy of the contingency plan to the Ohio EPA, DERR, in accordance with OAC Rule 3745-54-53? [PC B.18.(c)] Yes _X_ No ❑ N/A ___RMK#___

AVAILABILITY, RETENTION, AND DISPOSITION OF RECORDS

154. Has the Permittee made all records available for inspection, upon Ohio EPA request, at all reasonable times? [PC B.21.] Yes _X_ No ❑ N/A ___RMK#___

OPERATING RECORD REQUIREMENTS

155. At a minimum, does the Permittee record and maintain the following items as part of the operating record:

a. Copies of all required waste analysis results in accordance with OAC Rule 3745-54-73(B)(3)? [PC B.22.(a)] — Yes _X_ No ❑ N/A ___RMK#___

b. For waste defined as K061 EAF Dust in PC B.3.(h)(i), a working document or database, of the key parameters that influence the treatment process as this information becomes available? [PC B.22.(a)] If yes, then does this document or database contain the following: — Yes _X_ No ❑ N/A ___RMK#___

i. The identification of the batch being treated and/or tested? [PC B.22.(a)(i)] — Yes _X_ No ❑ N/A ___RMK#___

ii. The date samples are collected for the purpose of testing? [PC B.22.(a)(i)] — Yes _X_ No ❑ N/A ___RMK#___

iii. The identification name of the mix design used? [PC B.22.(a)(ii)] — Yes_X_ No ❑ N/A ___RMK#___

iv. The percent available free lime in the raw waste? [PC B.22.(a)(iii)] — Yes _X_ No ❑ N/A ___RMK#___

v. Whether the batch treated was "on-specification" or "off-specification" as defined in PC B.3.(j)? [PC B.22.(a)(iv)] — Yes _X_ No ❑ N/A ___RMK#___

vi. The pH of the TCLP extract fluid of the treated waste after completion of the extraction process? [PC B.22.(a)(v)] — Yes _X_ No ❑ N/A ___RMK#___

vii. Whether the batch met, or did not meet LDR treatment standards in OAC Rule 3745-54-270 after completion of the treatment process? [PC B.22.(a)(vi)] — Yes _X_ No ❑ N/A ___RMK#___

c. Copies of all required laboratory analyses of samples, and all required measurements taken for the purpose of monitoring such as drainage ditch samples, background soil samples, and ground water and surface water samples? [PC B.22.(b)]. If yes, then do these monitoring records include: — Yes _X_ No ❑ N/A ___RMK#___

NOTE: ***Samples and measurements required for the purpose of monitoring must be representative of the monitored activity. [PC B.22.(b)]***

i. Date(s), exact place, and time of sampling or measurement? [PC B.22.(b)(ii)(a)] Yes _X_ No ❑ N/A ___RMK#____

ii. Individual(s) who performed the sampling measurements? [PC B.22.(b)(ii)(b)] Yes _X_ No ❑ N/A ___RMK#____

iii. Analytical technique(s) or method(s) used? [PC B.22.(b)(ii)(c)] Yes _X_ No ❑ N/A ___RMK#____

iv. Results of such analysis? [PC B.22.(b)(ii)(d)] Yes _X_ No ❑ N/A ___RMK#____

v. Description of waste analysis discrepancies? [PC B.22.(b)(ii)(e)] Yes _X_ No ❑ N/A ___RMK#____

d. Copies of all required monitoring and measurements which are taken during closure, including monitoring to determine the level of decontamination? [PC B.22.(c)] Yes _X_ No ❑ N/A ___RMK#____

e. Copies of all closure notices, certifications, and documents required during the post-closure care period? [PC B.22.(c)] Yes _X_ No ❑ N/A ___RMK#____

f. A written post-closure operating record which includes:

i. Post-closure sampling and analytical data for ground water and leachate samples, and the amount of leachate or liquids removed from the leachate collection / leak detection system(s)? [PC B.22.(d)(i)] Yes _X_ No ❑ N/A ___RMK#____

ii. A survey plat indicating landfill location and record of hazardous waste in each cell? [PC B.22.(d)(ii)] Yes _X_ No ❑ N/A ___RMK#____

iii. Inspection reports and log forms including any remedial action? [PC B.22.(d)(iii)] Yes _X_ No ❑ N/A ___RMK#____

iv. Detailed reports of incidents requiring implementation of the Contingency Plan? [PC B.22.(d)(iv)] Yes _X_ No ❑ N/A ___RMK#____

v. Documentation of post-closure personnel training of employees or contractors? [PC B.22.(d)(v)] Yes _X_ No ❑ N/A ___RMK#____

vi. Certification of post-closure and notice in deed? [PC B.22.(d)(vi)] Yes _X_ No ❑ N/A ___RMK#____

g. Financial Reports that include:

i. A report on ability to maintain financial assurance for closure and post-closure care? [PC B.22.(e)(i)] Yes _X_ No ❑ N/A ___RMK#____

ii. Certificate of insurance? [PC B.22.(e)(ii)] Yes _X_ No ❑ N/A ___RMK#____

h. Records of landfill and SCB leak detection/collection systems? [PC B.22.(f)] Yes _X_ No ❑ N/A ___RMK#____

NOTE: ***The Permittee must notify the director if the response action plan requires implementation.***

i. The volume of liquids removed from each sump? [PC B.22.(g)] Yes _X_ No ❑ N/A ___RMK#____

j. The location and quantity of each hazardous waste disposed of in the active landfill cell, on a map or diagram? [PC B.22.(h)] Yes _X_ No ❑ N/A ___RMK#____

k. Does the Permittee retain the following tank system documentation in accordance with OAC Rule 3745-55-92: [PC B.22.(i)]

i. Certification of structural integrity? [PC B.22.(i)(i)] Yes _X_ No ❑ N/A ___RMK#____

ii. Tank and containment coating certification? [PC B.22.(i)(ii)] Yes _X_ No ❑ N/A ___RMK#____

iii. Proper installation? [PC B.22.(i)(iii)] Yes _X_ No ❑ N/A ___RMK#___

iv. "As-built" drawings for tank foundation and containment areas? [PC B.22.(i)(iv)] Yes _X_ No ❑ N/A ___RMK#____

l. Does the Permittee retain the following documentation for each new secure landfill cell:

i. Exploratory boring logs and any sample test results? [PC B.22.(j)(i)] Yes _X_ No ❑ N/A ___RMK#____

ii. Construction inspection reports, logs, soils and water sample analysis, moisture content, compaction, and permeability test results? [PC B.22.(j)(ii)] Yes _X_ No ❑ N/A ___RMK#____

iii. Corrective or remedial work reports, including sand zone replacement? [PC B.22.(j)(ii)] Yes _X_ No ❑ N/A ___RMK#____

iv. Manufacturer's weak seam evaluation reports? [PC B.22.(j)(iii)] Yes _X_ No ❑ N/A ___RMK#____

v. As-built drawings, with the exact location and dimensions (including depth) of all constructed secure landfill cells? [PC B.22.(j)(iv)] — Yes _X_ No ❑ N/A ___RMK#___

vi. Geologic maps of cell excavations and associated soil gradation analyses? [PC B.22.(j)(v)] — Yes _X_ No ❑ N/A ___RMK#___

vii. Record of compliance with ignitable, reactive, or incompatible waste restrictions for each secure cell? [PC B.22.(j)(vi)] — Yes _X_ No ❑ N/A ___RMK#___

m. Has the Permittee retained required records from the facility ground water monitoring and inspection programs through the post-closure period? [PC B.22.(k)] — Yes _X_ No ❑ N/A ___RMK#___

If yes, then do the records include the following:

i. Well boring and/or core logs? [PC B.22.(k)(i)] — Yes _X_ No ❑ N/A ___RMK#___

ii. Soil sample gradation analyses and permeability test results? [PC B.22.(k)(ii)] — Yes _X_ No ❑ N/A ___RMK#___

iii. Well completion reports? [PC B.22.(k)(iii)] — Yes _X_ No ❑ N/A ___RMK#___

iv. Sampling logbook? [PC B.22.(k)(iv)] — Yes _X_ No ❑ N/A ___RMK#___

v. Various ground water flow and direction reports? [PC B.22.(k)(v)] — Yes _X_ No ❑ N/A ___RMK#___

vi. Compliance monitoring soil vapor survey data? [PC B.22.(k)(vi)] — Yes_X_ No ❑ N/A ___RMK#___

vii. Interim information reports and final source determination reports? [PC B.22.(k)(vii)] — Yes _X_ No ❑ N/A ___RMK#___

viii. Corrective action feasibility plans? [PC B.22.(k)(viii)] — Yes _X_ No ❑ N/A ___RMK#___

ix. Variance applications? [PC B.22.(k)(ix)] — Yes _X_ No ❑ N/A ___RMK#___

x. Sample custody forms? [PC B.22.(k)(x)] — Yes _X_ No ❑ N/A ___RMK#___

xi. Ground water analysis and QA/QC reports? [PC B.22.(k)(xi)] — Yes _X_ No ❑ N/A ___RMK#___

xii. Background concentration calculations? [PC B.22.(k)(xii)] — Yes _X_ No ❑ N/A ___RMK#___

xiii. Statistical test calculation done in accordance with OAC Rules 3745-54-97, 98, and 99? [PC B.22.(k)(xiii)] — Yes _X_ No ❑ N/A ___ RMK#____

156. Did the Permittee review the working document or database required by PC B.22.(a) monthly and correct any errors or omissions? [PC B.22.(a)] — Yes _X_ No ❑ N/A ___ RMK#____

CONTINGENCY PLAN RECORDS

157. Did the Permittee note in the operating record the time, date, and details of any incident that requires the implementation of the contingency plan? [PC B.23.] — Yes _X_ No ❑ N/A ___ RMK# _3_

158. Did the Permittee submit a report to the director of implementation of the contingency plan within 15 days of the incident, containing the elements set forth in OAC Rule 3745-54-56(J)? [PC B.23.] — Yes _X_ No ❑ N/A ___ RMK# _3_

MANIFEST REQUIREMENTS

159. Is all hazardous waste transported to and from the facility by a properly registered transporter of hazardous waste in accordance with all applicable laws and rules? [PC A.16] — Yes _X_ No ❑ N/A ___ RMK#____

160. Has the Permittee complied with OAC Chapter 3745-52 and OAC Rules 3745-54-71, 3745-54-72, and 3745-54-76, while managing waste at the facility, in regard to the manifest system? [PC B.24.(a)] — Yes _X_ No ❑ N/A ___ RMK# ____

161. Does the Permittee notify the director, in writing, at least 4 weeks in advance of the date that the Permittee expects to receive hazardous waste from a non-United States source? [PC B.2(a)] — Yes ___ No ❑ N/A _X_ RMK#_17__

NOTE: ***Notice of subsequent shipments of the same waste from the same non-United States source is not required. [PC B.2.(a)]***

162. When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator) does the Permittee inform the generator, in writing, that the facility has the appropriate permits, and will accept the waste that the generator is shipping? [PC B.2.(b)] — Yes _X_ No ❑ N/A ___ RMK#____

163. Does the Permittee keep the written notice in the above question as part of the operating record? [PC B.2(b)] — Yes _X_ No ❑ N/A ___ RMK#___

164. Has the Permittee attempted to reconcile all significant discrepancies discovered in waste manifests? [PC B.24.(b)] — Yes _X_ No ❑ N/A ___ RMK#____

a. If the discrepancy is not resolved within 15 days after receiving the waste, has the Permittee submitted a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest, to the director? [PC B.24.(b)]

Yes ___ No ❑ N/A _X_ RMK# 18

165. Has the Permittee received any unmanifested waste, not excluded from the manifest requirements of OAC Rule 3745-51-05? [PC B.24.(c)] If yes, then:

Yes ___ No _X_ N/A ___ RMK# ___

a. Did the Permittee submit an unmanifested waste report to the director within 15 days after receipt of the waste in accordance with OAC Rule 3745-54-76? [PC B.24.(c)]

Yes ___ No ❑ N/A _X_ RMK# ___

ANNUAL REPORTS AND ADDITIONAL REPORTS

166. Has the Permittee complied with the annual report requirements set forth in OAC Rule 3745-54-75 and additional reports requirements set forth in OAC Rule 3745-54-77? [PC B.25.]

Yes ___ No _X_ N/A ___ RMK# 19

CLOSURE REQUIREMENTS

167. Has the Permittee closed the facility as required by OAC Rules 3745-55-10 through 3745-55-20, Section I of the permit application, and the terms and conditions of the permit? [PC B.26., PC B.27, PC B.29.]

Yes _X_ No ❑ N/A __ RMK# 20

168. Did the Permittee submit an updated Section I of the permit application addressing all of the comments outlined in Attachment B of the permit, within 90 days after permit journalization? [PC B.27]

Yes _X_ No ❑ N/A ___ RMK# 21

169. Has the Permittee amended the approved closure plan? If so, then:

Yes _X_ No ___ N/A ___ RMK# ___

a. Was the plan amended in accordance with OAC Rule 3745-55-12(C)? [PC B.28.]

Yes _X_ No ❑ N/A ___ RMK# ___

170. Did the Permittee notify Ohio EPA at least 60 days prior to the date that closure of cell M or final closure was expected to begin? [PC B.30.]

Yes __ No ❑ N/A _X_ RMK# 22

171. Within 90 days after receiving the final volume of hazardous waste, did the Permittee remove from the facility or, treat or dispose on-site all hazardous waste in accordance with the closure plan and as required by OAC Rule 3745-55-13? [PC B.31.]

Yes ___ No ❑ N/A _X_ RMK# 22

NOTE: ***The director may approve a longer closure period if the Permittee complies with all applicable requirements for requesting a modification to the permit as set forth in OAC Rule 3745-55-13(A).***

172. Did the Permittee complete all closure activities within 180 days after receiving the final volume of hazardous waste in accordance with OAC Rule 3745-55-13? [PC B.31.] Yes ___ No ❑ N/A _X_ RMK# 22

NOTE: ***The director may approve a longer closure period if the Permittee complies with all applicable requirements for requesting a modification to the permit as set forth in OAC Rule 3745-55-13(B).***

DISPOSAL OR DECONTAMINATION OF EQUIPMENT, STRUCTURES, AND SOILS

173. Did the Permittee decontaminate and/or dispose of all facility equipment, structures, and soils as required by OAC Rule 3745-55-14, the closure plan and terms and conditions of the permit? [PC B.32.(a).] Yes ___ No ❑ N/A _X_ RMK# 22

174. Has the Permittee notified Ohio EPA, NWDO within 5 business days prior to all related rinseate and soil sampling? [PC B.32.(b)] Yes ___ No ❑ N/A _X_ RMK# 22

CERTIFICATION OF CLOSURE

175. Did the Permittee and an independent, registered professional engineer certify that each hazardous waste management unit or the facility has been closed in accordance with the specification in the closure plan and the terms and conditions of the permit as required by OAC Rule 3745-55-15? [PC B.33.] Yes ___ No ❑ N/A _X_ RMK# 22

NOTE: ***The Permittee must furnish to the director, upon request, documentation supporting the certification.***

SURVEY PLAT

176. Has the Permittee submitted a survey plat to the director and the local zoning authority no later than the submittal of the certification of closure of each hazardous waste disposal unit? [PC B.34.] Yes ___ No ❑ N/A _X_ RMK# 22

GENERAL POST-CLOSURE REQUIREMENTS

177. Has the Permittee began post-closure care for each tank system, landfill, or containment building after completion of closure and continue for 30 years? [PC B.35.(a)] Yes _X_ No ❑ N/A __ RMK# 23

178. Has the Permittee maintained security at the facility during the post-closure care period, in accordance with the post-closure plan and OAC Rule 3745-55-17(B)? [PC B.35.(b)] Yes _X_ No ❑ N/A __ RMK# 23

179. Has the Permittee amended the post-closure plan, when necessary, in accordance with OAC Rule 3745-55-18(D)? [PC B.35.(c)] Yes _X_ No ❑ N/A ___RMK#___

POST-CLOSURE NOTICES AND CERTIFICATION OF COMPLETION

180. Has the Permittee submitted to the director and the local zoning authority records of the type, location, and quantity of hazardous waste disposed of within each cell or disposal unit no later than 60 days after certification of closure? [PC B.35.(d)(I)] Yes ___ No ❑ N/A _X_ RMK# 23

181. Did the Permittee complete the following activities within 60 days of certification of closure of the first hazardous waste disposal unit and within 60 days of certification of closure of the last hazardous waste disposal unit: [PC A.35.(d)(ii)]

a. Record a notation on the deed or on some other instrument which is normally examined during title search, which contains the information required by OAC Rule 3745-55-19(B)(1)? [PC B.35.(d)(ii)(a)] Yes ___ No ❑ N/A _X_RMK# 23

b. Submit a certification to the director that records the notation and submit a copy of the document in which the notation was placed? [PC B.35.(d)(ii)(b)] Yes ___ No ❑ N/A _X_RMK#___

c. Request and maintain a permit modification prior to post-closure removal of hazardous waste, hazardous waste residues, liners, or contaminated soils, in accordance with OAC Rule 3745-55-19(c)? [PC B.35.(d)(ii)(c)] Yes ___ No ❑ N/A _X_ RMK#___

182. Has the Permittee certified that the post-closure care period was performed in accordance with the specifications in the post-closure plan and the terms and conditions of this permit, no later than 60 days after completion of the established post-closure care period for each hazardous waste disposal unit? [PC B.35.(e)] Yes ___ No ❑ N/A _X_RMK# 23

NOTE: ***The Permittee must furnish to the director, upon request, documentation supporting the certification. [PC B.35(e)]***

COST ESTIMATE FOR FACILITY CLOSURE AND POST-CLOSURE

183. Was the Permittee's most recent closure and post-closure cost estimate prepared in accordance with OAC Rule 3745-55-42 and 3745-55-44 as specified in Section I of the permit application? [PC B.36.(a)] Yes _X_ No ❑ N/A ___RMK#___

184. Did the Permittee adjust the closure and post-closure cost estimate for inflation within 60 days prior to the anniversary date of the establishment of the financial instrument(s) used? [PC B.36.(b)] Yes _X_ No ❑ N/A ___RMK#___

185. Did the Permittee revise the closure and post-closure cost estimate whenever there is a change in the facility's closure and post-closure plan that increases the cost of care? [PC B.36.(c)] Yes _X_ No ❑ N/A ___RMK#___

186. Did the Permittee submit to the Ohio EPA and keep at the facility the latest closure and post-closure cost estimate? [PC B.36.(d)] Yes _X_ No ❑ N/A ___RMK#___

FINANCIAL ASSURANCE FOR FACILITY CLOSURE, POST-CLOSURE, AND PERPETUAL CARE

187. Has the Permittee demonstrated continuous compliance with OAC Rules 3745-55-43, 55-45, 55-46 and provided documentation of financial assurance that meets the requirements of OAC Rule 3745-55-51? [PC B.37.(a)] Yes _X_ No ❑ N/A ___RMK#___

188. Has the Permittee compared the new estimates with the Trustee's most recent statement of the trust funds whenever the cost estimates change? [PC B.37.(b)] If yes, then: Yes _X_ No ❑ N/A ___RMK#___

a. Did the Permittee deposit an amount into the funds so that its value at least equals the amount of the current cost estimates within 60 days after the change, if the value of the fund was less than the amount of the new estimates? [PC B.37.(b)] Or: Yes _X_No___N/A ___RMK#___

b. Did the Permittee obtain other financial assurance, as specified in OAC Rule 3745-55-43, to cover the difference? [PC B.37.(b)] Yes ___No___N/A _X_RMK#___

189. Has the Permittee annually reviewed and updated for inflation, the perpetual care amount of 11.5 million dollars in the post-closure trust fund? [PC B.37.(c)] Yes _X_ No ❑ N/A ___RMK#___

190. Are the closure and post-closure trust funds:

a. Irrevocable? [PC B.37.(f)] Yes _X_ No ❑ N/A ___RMK#___

b. Worded in such a manner as to cause the funds to be tax exempt? [PC B.37.(f)] Yes _X_ No ❑ N/A ___RMK#___

191. Has the Permittee relinquished its rights to any excess monies in the funds? [PC B.37.(f)] Yes _X_ No ❑ N/A ___RMK#___

192. Have any excess monies remaining in the closure trust fund been transferred to the post-closure trust fund, with approval of Ohio EPA, after the entire facility has been closed and certified in compliance with applicable Ohio hazardous waste rules? [PC B.37.(g)]

Yes ___ No ❑ N/A _X_ RMK# 23

193. Has the Permittee directed the Trustee(s) of the closure and post-closure trust funds to invest the funds monies only in the investments listed in Attachment C of the permit? [PC B.37.(h)]

Yes _X_ No ❑ N/A ___ RMK#___

LIABILITY REQUIREMENTS

194. Has the Permittee maintained continuous compliance with the requirements of OAC Rule 3745-55-47 and the documentation of liability by providing liability coverage which meets the requirements of OAC Rule 3745-55-51 for sudden accidental occurrences? [PC B.38.]

Yes_X_ No ❑ N/A ___ RMK#___

NOTE: ***Liability coverage for sudden accidental occurrences must be provided in the amount of at least $1 million per occurrence, with an annual aggregate of at least $2 million, exclusive of legal defense costs. [PC B.38.]***

195. Has the Permittee demonstrated compliance with OAC Rule 3745-55-47(B) by maintaining liability coverage for nonsudden accidental occurrences? [PC B.38.]

Yes _X_ No ❑ N/A ___ RMK#___

NOTE: ***Liability coverage for nonsudden accidental occurrences must be maintained in the amount of at least $3 million per occurrence, with an annual aggregate of at least $6 million, exclusive of legal defense costs. [PC B.38.]***

INCAPACITY OF PARTIES

196. Has the Permittee complied with the requirements set forth in OAC Rule 3745-55-48 regarding the incapacity of owners, operators, guarantors or financial institutions? [PC B.39.]

Yes _X_ No ❑ N/A ___ RMK#___

LDR GENERAL REQUIREMENTS

197. Has the Permittee complied with all applicable regulations regarding land disposal prohibitions and restrictions as required by OAC Chapter 3745-270? [PC B.40.]

Yes _X_ No ❑ N/A ___ RMK#___

MODULE C – CONTAINER STORAGE and TREATMENT REQUIREMENTS

CONTAINER STORAGE / QUANTITY LIMITATION

1. Has the Permittee exceeded the authorized storage capacity of 4,385 cubic yards of hazardous waste in the seven permitted outside storage areas and the five storage areas in the SCB? [PC C.1.(a)] — Yes ❑ No_X_N/A ___RMK#____

2. Does the Permittee store hazardous waste in the types of containers described in Section D of the permit application? [PC C.1.(b)] — Yes _X_ No ❑ N/A ___RMK#____

NOTE: ***For the purpose of compliance with the capacity limitation of this permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity, regardless of the actual quantity stored in the container. [PC C.1.(c)]***

3. Has the Permittee exceeded the maximum container storage inventory established under this permit condition for the total amount of hazardous waste stored and accumulated? [PC C.1.(d)] — Yes ❑ No_X_N/A ___RMK#____

CONTAINER TREATMENT LIMITATIONS

4. Does the Permittee treat hazardous waste in containers in the manner described in Section D of the permit application? [PC C.2.(a)] — Yes _X_ No ❑ N/A ___RMK#____

NOTE: ***The Permittee is authorized to treat hazardous waste in the container treatment areas B, D, and T located in the SCB, described in Table C-2. [PC C.2.(a)]***

5. Has the Permittee exceeded the maximum throughput capacity established under this condition for the total amount of hazardous waste treated within the permitted treatment area? [PC C.2.(b)] — Yes ❑ No_X_N/A ___RMK#____

6. Is the Permittee storing and treating in containers only those hazardous wastes codes specified in Part A of the permit application? [PC C.3.] — Yes _X_ No ❑ N/A ___RMK#____

7. Has the Permittee transferred all hazardous wastes from containers not in good condition, or leaking containers to containers in good condition or managed the waste in compliance with this permit and the OAC? [PC C.4.] — Yes _X_ No ❑ N/A ___RMK#____

8. Does the Permittee use containers made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so the container is not impaired? [PC C.5.] — Yes _X_ No ❑ N/A ___RMK#____

CONTAINER MANAGEMENT

9.	Are containers holding hazardous waste closed at all times except when it is necessary to add or remove waste? [PC C.6.(a)]	Yes _X_ No ❑ N/A ___ RMK#___
10.	Does the Permittee ensure that containers are handled in a manner that prevents rupture or leakage? [PC C.6.(a)]	Yes _X_ No ❑ N/A ___ RMK#___
11.	If lab-packs are generated, are they handled in compliance with applicable storage requirements? [PC C.6.(b)]	Yes _X_ No ❑ N/A ___ RMK#___
12.	If lab-pack waste is generated, is it packaged in drums containing absorbent material that is compatible with the waste? [PC C.6.(c)]	Yes _X_ No ❑ N/A ___ RMK#___
13.	Is loading and unloading of containers or drums conducted at locations where secondary containment is provided? [PC C.6.(d)]	Yes _X_ No ❑ N/A ___ RMK#___
14.	When handling drums, does the Permittee take all reasonable steps to prevent damage to or rupture of containers? [PC C.6.(e)]	Yes _X_ No ❑ N/A ___ RMK#___
15.	Does the Permittee ensure that the movement of containers is accomplished by trained personnel using a forklift, two wheel drum cart, or other specialized container handling unit? [PC C.6.(e)]	Yes _X_ No ❑ N/A ___ RMK#___
16.	Does the Permittee ensure that drums or containers, excluding roll-off boxes, are stored in rows that are no more that two pallets wide? [PC C.6.(f)]	Yes _X_ No ❑ N/A ___ RMK#___
17.	Does the Permittee ensure that pallets are stacked no more than two layers high? [PC C.6.(f)]	Yes _X_ No ❑ N/A ___ RMK#___
18.	Does deheading of drums and/or transfer of drum or container contents occur only within areas provided with secondary containment? [PC C.6.(g)]	Yes _X_ No ❑ N/A ___ RMK#___
19.	After each shipment of hazardous waste in containers is received, and has been placed into storage, does the Permittee label the containers storing hazardous waste with the following information:	
a.	Waste type and description? [PC C.6.(h)(i)]	Yes___ No _X_ N/A ___ RMK# 24
b.	The date received into storage bay? [PC C.6.(h)(ii)]	Yes _X_ No ❑ N/A ___ RMK#___
c.	Permittee load number and/or container sequence number(for on-site generated waste)?[PC C.6.(h)(iii)]	Yes _X_ No ❑ N/A ___ RMK#___

d. Generator name? [PC C.6.(h)(iv)] Yes___ No X N/A ___ RMK# 24

e. Waste Stream Identification Number (WSID) [PC C.6.(h)(v)] Yes___ No X N/A ___ RMK# 24

CONTAINMENT SYSTEMS

20. Has the Permittee constructed and maintained the containment system in accordance with Section D of the permit application? [PC C.7.(a)] Yes X No ☐ N/A ___RMK#___

21. Is the containment system designed with sufficient capacity to contain 10% of the total volume of the containers or the largest container, whichever is greater? [PC C.7.(b)] Yes X No ☐ N/A ___RMK#___

22. Is the containment system free of cracks and gaps, and sufficiently impervious to contain leaks and spills and accumulated precipitation until the liquid is detected and removed? [PC C.7.(b)] Yes X No ☐ N/A ___RMK#___

23. Are the containers elevated or otherwise protected from contact with accumulated liquids? If no, then: Yes ___No X N/A ___RMK#___

a. Is the base of the containment system sloped to a collection sump or otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation? [PC C.7.(c)] Yes X No ☐ N/A ___RMK#___

24. Does the Permittee prevent run-on into the containment systems? [PC C.7.(d)] Yes X No ☐ N/A ___RMK#___

25. Has the Permittee removed from the containment areas, storage areas, and unloading areas, sumps and collection areas, spilled or leaked waste, accumulated precipitation and other spilled liquid, within 24 hours from the time discovered, or if not possible, in a timely manner? [PC C.7.(e)] Yes X No ☐ N/A ___RMK#___

26. Has the Permittee maintained and operated the railroad car storage and loading/unloading area liquid collection and removal system to collect and remove contaminated liquids? [PC C.7.(f)] Yes X No ☐ N/A ___RMK#___

27. Has the Permittee maintained and operated the railroad car storage and loading/unloading area liquid collection system to allow the system to function without clogging through the scheduled closure? [PC C.7.(f)] Yes X No ☐ N/A ___RMK#___

RAILROAD SPUR TRACK - AREAS M, N, AND T

28. Are railroad locomotives permitted to enter the SCB? [PC C.8.(a)] Yes ☐ No X N/A ___RMK#___

29. Do all railcar movements into and away from the facility occur at speeds less than 10 mph? [PC C.8.(b)] — Yes _X_ No ❑ N/A ___ RMK#___

30. Does the Permittee maintain access to the paved road adjacent to storage areas M and N at all times? [PC C.8.(c)] — Yes _X_ No ❑ N/A ___ RMK#___

31. Does the Permittee advise the generator to line the gondola railcars and intermodal freight containers with polyethylene liner (or equivalent) prior to shipment? [PC C.8.(d)] — Yes _X_ No ❑ N/A ___ RMK#___

32. Does the Permittee label all railroad cars arriving at the facility in accordance with OAC Rule 3745-270-50 (A)(2)(a)? [PC C.8.(e)] — Yes ___ No _X_ N/A ___ RMK# 24

INSPECTION SCHEDULES AND PROCEDURES

33. Does the Permittee inspect the container storage areas in accordance with the inspection schedule in Section F of the permit application and OAC Rule 3745-54-15? If yes, then: — Yes _X_ No ❑ N/A ___ RMK#___

    a. Is the inspection schedule designed to detect for leaking containers, deteriorating containers and/or containment systems? [PC C.9.(a)] — Yes _X_ No ❑ N/A ___ RMK#___

    b. Does the Permittee note the results of these inspections in the inspection log including any remedial action taken? [PC C.9.(a)] — Yes _X_ No ❑ N/A ___ RMK#___

34. Does the Permittee inspect loading or unloading areas daily when in use and maintain the inspection results in the operating record? [PC C.9.(b)] — Yes _X_ No ❑ N/A ___ RMK#___

35. Does the Permittee transfer the contents of any drums or containers found to be leaking, corroded, deteriorated or incompatible with its contents to suitable storage or treatment as soon as possible after detected? [PC C.9.(c)] — Yes _X_ No ❑ N/A ___ RMK# ___

36. Are all railroad cars inspected by trained personnel prior to entering and/or exiting the facility? [PC C.9.(d)] — Yes ___ No _X_ N/A ___ RMK# 25

RECORDKEEPING

37. Has the Permittee complied with all recordkeeping requirements of OAC Rule 3745-54-73? [PC C.10.(a)] — Yes _X_ No ❑ N/A ___ RMK#___

38. Did the Permittee provide an information sheet explaining the proper loading procedures to prevent waste from leaking during transport to each generator transporting waste to the facility by railcar? [PC C.10.(b)] If yes, then: — Yes _X_ No ❑ N/A ___ RMK#___

a. Did the Permittee document in the operating record that the information sheet was provided to each generator prior to their first shipment of waste to the facility? [PC C.10.(b)] — Yes _X_ No ❑ N/A ___ RMK#___

39. After each shipment of hazardous waste in containers is received, and has been placed into storage, does the Permittee log into daily report the following information? [PC C.10.(c)]

a. The number of containers in each storage area? [PC C.10.(c)(i)] — Yes _X_ No ❑ N/A ___ RMK#___

b. Waste type and description? [PC C.10.(c)(ii)] — Yes _X_ No ❑ N/A ___ RMK#___

c. The date received into storage area? [PC C.10.(c)(iii)] — Yes _X_ No ❑ N/A ___ RMK#___

d. Location? [PC C.10.(c)(iv)] — Yes _X_ No ❑ N/A ___ RMK#___

e. Date removed from the storage area? [PC C.10.(c)(v)] — Yes _X_ No ❑ N/A ___ RMK#___

f. Permittee load number and/or container sequence number? [PC C.10.(c)(vi)] — Yes _X_ No ❑ N/A ___ RMK#___

g. Generator name? [PC C.10.(c)(vii)] — Yes _X_ No ❑ N/A ___ RMK#___

h. Waste Stream Identification Number? [PC C.10.(c)(viii) — Yes _X_ No ❑ N/A ___ RMK#___

SPECIAL CONTAINER PROVISIONS FOR IGNITABLE OR REACTIVE WASTE

40. Does the Permittee store containers holding ignitable or reactive waste at least 100 feet from the center line of any public roads, or at least 50 feet from the facility's property line? [PC C.11.(b)] — Yes ___ No ❑ N/A _X_ RMK#___

41. Does the Permittee take precautions to prevent accidental ignition or reaction and follow the storage procedures specified in Section D of the permit application? [PC C.11.(c)] — Yes _X_ No ❑ N/A ___ RMK#___

42. Has the Permittee inadvertently received ignitable, flammable, or combustible liquid waste? [PC C.11.(d)] — Yes ___ No _X_ N/A ___ RMK#___
If yes, was the waste stored as follows:

a. Class I flammable liquids only in metal containers? [PC C.11.(d)(I)] — Yes ___ No ❑ N/A _X_ RMK#___

b. Class II and Class III combustible liquids only in metal or polyethylene containers? [PC C.11.(d)(i)] — Yes ___ No ❑ N/A _X_ RMK#___

c. Do all drums used for storage of ignitable wastes meet the DOT specifications of 49 CFR 178, Subpart D? [PC C.11.(d)(ii)] — Yes ___ No ❑ N/A _X_ RMK#___

NOTE: ***Class II combustible liquids have a flashpoint between 100° F and 140° F, while Class III combustible liquids have a flashpoint greater than 140° F. Ignitable wastes that are not stored in DOT specified metal or polyethylene containers must be immediately transferred to a DOT specified metal or polyethylene container.***

SPECIAL CONTAINER PROVISIONS FOR INCOMPATIBLE WASTE

43. Has the Permittee placed hazardous waste in an unwashed container that previously held an incompatible waste or material? [PC C.12.(a)] — Yes ❑ No_X_ N/A ___ RMK# 28

44. Has the Permittee separated or protected storage containers holding a hazardous waste that is incompatible with any waste or other materials stored nearby? [PC C.12.(c)] — Yes ❑ No___ N/A _X_ RMK# 28

45. Does the Permittee ensure that incompatible wastes are stored in separate areas of the container storage areas located inside and outside of the SCB as classified by the following compatibility groups:

a. Ignitable waste and/or non-ignitable wastes? [PC C.12.(d)(i)] — Yes ___ No ❑ N/A _X_ RMK# 28

b. Oxidizers? [PC C.12.(d)(ii)] — Yes ___ No ❑ N/A _X_ RMK# 28

c. Reducers? [PC C.12.(d)(iii)] — Yes ___ No ❑ N/A _X_ RMK# 28

d. Acids? [PC C.12.(d)(iv)] — Yes ___ No ❑ N/A _X_ RMK# 28

e. Bases? [PC C.12.(d)(v)] — Yes ___ No ❑ N/A _X_ RMK# 28

f. Acid sensitive wastes? [PC C.12.(d)(vi)] — Yes ___ No ❑ N/A _X_ RMK# 28

g. Alkaline sensitive wastes? [PC C.12.(d)(vii)] — Yes ___ No ❑ N/A _X_ RMK# 28

h. Water reactive wastes? [PC C.12.(d)(viii)] — Yes ___ No ❑ N/A _X_ RMK# 28

CLOSURE AND POST-CLOSURE

46. Has the Permittee removed all hazardous waste and hazardous waste residues from the containment systems at closure of the container storage areas? [PC C.14.] — Yes ___ No ❑ N/A _X_ RMK# 26

MODULE D – TANK STORAGE AND MANAGEMENT REQUIREMENTS

TANK STORAGE QUANTITY / TREATMENT LIMITATION AND WASTE IDENTIFICATION

1. Does the Permittee ensure that the maximum tank storage inventory does not exceed 160,000-gal in eight tanks and in accordance with the Table listed in PC D.1.(a)? [PC D.1.(a) and(b)] — Yes _X_ No ❑ N/A ___ RMK#___

2. Has the Permittee treated any hazardous waste in a tank? [PC D.2.(a)] — Yes ❑ No_X_ N/A ___ RMK#___

NOTE: ***The above provision shall not apply to the Permittee's activities as a generator treating hazardous waste in tanks on-site in compliance with OAC Rule 3745-52-34.***

DESIGN AND INSTALLATION OF TANKS S-4, S-5, S-6, AND S-7

3. Has the Permittee located all tanks at least 100 feet from the center line of the nearest City of Toledo raw water line, and at least 100 feet from the center line of any public road, or the protective distances set forth in section 2-2 of the NFPA 30 (whichever is greater)? [PC D.3.(a)(i) & (ii)] — Yes ___ No ❑ N/A _X_ RMK# 27

4. Does the Permittee ensure, for each newly installed tank system, that the following proper handling procedures are adhered to in order to prevent damage to the system during installation: [PC D.3.(b)]

   a. A sonic liquid level or capacitance type detector? — Yes ___ No ❑ N/A _X_ RMK# 27

   b. A conservation breather vent? — Yes ___ No ❑ N/A _X_ RMK#___

   c. A man-way? — Yes ___ No ❑ N/A _X_ RMK#___

   d. A separate fill/drain line? — Yes ___ No ❑ N/A _X_ RMK#___

   e. A plug or ball valve with resistant seal, or equivalent? — Yes ___ No ❑ N/A _X_ RMK#__

5. Has the Permittee installed a vapor balancing system in all tanks containing organic compounds? [PC D.3.(b)(i)] — Yes__ No ❑ N/A _X_ RMK# 27, 28

6. Are tanks handling ignitable wastes grounded and equipped with flame arresters explosion-proof controls? [PC D.3.(b)(i)] — Yes__ No ❑ N/A _X_ RMK# 27, 28

7. Do tanks in each waste category have a separate loading/unloading station, and are tanks, pumps, and connecting pipe work color-coded as an added safeguard against possible mixing of incompatible wastes? [PC D.3.(b)(i)] — Yes__ No ❑ N/A _X_ RMK# 27, 28

CONTAINMENT AND DETECTION OF RELEASES

8. Does the Permittee construct and operate the secondary containment system in accordance with requirements of OAC Rule 3745-55-93(B) through (F), and section D of the permit application for New Tank Systems? [PC D.4.(a)] — Yes ___ No ❑ N/A _X_ RMK#_27_

NOTE: New tanks at the facility are: S-100, S-200, S-300, and S-400. New tanks yet to be constructed are: S-4, S-5, S-6, and S-7.

9. Have all collection sumps been provided with an HDPE liner and equipped with an HDPE collection pipe? [PC D.4.(d)] — Yes _X_ No ❑ N/A ___RMK#___

   a. Has the HDPE liner within the diked surfaces been sloped such that all liquids drain to the collection sump? [PC D.4.(d)] — Yes _X_ No ❑ N/A ___RMK#___

10. Has the Permittee designed and operated all secondary containment system barriers to contain 100% of the total volume of the largest tank within a given area and precipitation from a 25-year/24-hour storm? [PC D.4.(e)] — Yes _X_ No ❑ N/A ___RMK#___

11. Has the Permittee designed and installed all external liner systems so that they completely surround the tank and cover all surrounding earth likely to come into contact with the waste if the waste was released from the tank? [PC D.4.(f)] — Yes _X_ No ❑ N/A ___RMK#___

12. Does the Permittee ensure that all external liner systems designed for secondary containment are free of cracks and gaps? [PC D.4.(g)] — Yes _X_ No ❑ N/A ___RMK#___

   a. Does the Permittee check for visible damage including small scratches, indentation, tears, or punctures to the liner as it is installed? [PC D.4.(g)] — Yes _X_ No ❑ N/A ___RMK#___

   b. When found, is all such damage inspected by the liner installation contract inspector and repaired? [PC D.4.(g)] — Yes _X_ No ❑ N/A ___RMK#___

13. Has the Permittee removed liquids or sludge from the secondary containment systems within 24 hours, or in a timely manner, after the inspection when observed? [PC D.4.(h)] — Yes _X_ No ___ N/A ___ RMK#___

OPERATING REQUIREMENTS

14. Does the Permittee operate the tank systems to ensure that hazardous wastes or treatment reagents are not placed in the tank, its ancillary equipment, or the containment system if such placement could cause a rupture, leak, corrosion or failure? [PC D.5.(a)] — Yes _X_ No ❑ N/A ___RMK#___

15. Are the following controls and practices used to prevent spills and overflows from the tank or containment system:

a. The storage tanks and waste materials are compatible? [PC D.5.(b)(i)] — Yes _X_ No ❑ N/A ___ RMK#___

b. The tanks are not used for mixing non-compatible wastes? [PC D.5.(b)(i)] — Yes _X_ No ❑ N/A ___ RMK#___

c. Prior to adding to the contents of any tank, the tank inventory control logs are reviewed to ensure that the tank is operated according to the design specifications? [PC D.5.(b)(i)] — Yes_X_ No ❑ N/A ___ RMK#___

16. Is the loading and unloading of transportation vehicles to and from tanks conducted at locations where secondary containment is located? [PC D.5.(b)(ii)] — Yes _X_ No ❑ N/A ___ RMK#___

17. Prior to completion of waste transfer, are all valves closed and hoses disconnected over a portable container to collect drippings? [PC D.5.(b)(iii)] — Yes _X_ No ❑ N/A ___ RMK#___

18. Upon completion of waste transfer, is the storage tank gauged and the tank's valve locked? [PC D.5.(b)(iii)] — Yes _X_ No ❑ N/A ___ RMK#___

19. Does the Permittee utilize a carbon absorption or equivalent system to control organic emissions from the storage tanks? [PC C.5.(c)] — Yes _X_ No ❑ N/A ___ RMK#___

20. Does the Permittee prohibit smoking and place "No Smoking" signs in clear view in the tank area? [PC D.5.(d)] — Yes _X_ No ❑ N/A ___ RMK#___

21. Does the Permittee prohibit open flames and heat sources in the storage tank area unless areas are cleared of all ignitable wastes, residues, and vapors? [PC D.5.(d)] — Yes _X_ No ❑ N/A ___ RMK#___

INSPECTION SCHEDULES AND PROCEDURES

22. Does the Permittee inspect the tank system in accordance with the inspection schedules in Section F of the permit application? [PC D.6.(a)] — Yes _X_ No ❑ N/A ___ RMK#___

23. Does the Permittee inspect the overfill controls in accordance with the permit application? [PC D.6.(b)] — Yes_X_ No ❑ N/A ___ RMK#___

24. Does the Permittee inspect the following components of the tank system once each operating day? [PC D.6.(c)]

a. Aboveground portions of the tank system, to detect corrosion or releases? [PC D.6.(c)(i)] — Yes _X_ No ❑ N/A ___ RMK#__

b. Data gathered from monitoring and leak detection equipment to ensure appropriate operation? [PC D.6.(c)(ii)] — Yes _X_ No ❑ N/A ___RMK#____

c. Construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, to detect erosion or signs of releases? [PC D.6.(c)(iii)] — Yes _X_ No ❑ N/A ___RMK#____

25. Is compliance with PC D.6. documented in the operating record? [PC D.6.(d)] — Yes _X_ No ❑ N/A ___RMK#____

26. For each storage tank in use, does the Permittee document the following information in the Tank Inventory Control Log as a component of the facility operating record on a daily basis:

a. Quantity of each waste that was added or removed? [PC D.6.(e)(i)] — Yes _X_ No ❑ N/A ___RMK#____

b. The EPA waste code number of the waste material transferred? [PC D.6.(e)(ii)] — Yes _X_ No ❑ N/A ___RMK#____

c. Any additional information or comments concerning the waste compatibility and/or waste processing for safe operation of the tank? [PC D.6.(e)(iii)] — Yes _X_ No ❑ N/A ___RMK#____

d. The tank volume after transfer, how the tank was gauged, and a verification that overfilling control equipment is properly working? [PC D.6.(e)(iv)] — Yes _X_ No ❑ N/A ___RMK#____

e. The level control devices/equipment to ensure that they are operating properly? [PC D.6.(e)(v)] — Yes _X_ No ❑ N/A ___RMK#___

27. On an annual basis, does the Permittee empty and inspect all storage tanks for signs of erosion and corrosion? [PC D.6.(f)] — Yes _X_ No ❑ N/A ___RMK#_29_

RESPONSE TO LEAKS AND SPILLS

28. Have there been any spills/leaks from the tank or secondary containment system, or has a unit been found unfit for use by the Permittee? If so, did the Permittee do the following: — Yes ___No_X_N/A____RMK#____

a. Immediately stop the flow of hazardous waste into the tank system, or secondary containment system and inspect the system to determine the cause of release? [PC D.7.(a)(i)] — Yes ___ No ❑ N/A _X_RMK#____

b. Remove as much of the waste as necessary within 24-hours as to prevent further releases of hazardous waste to the environment, and to allow inspection and repair of the tank system to be performed? [PC D.7.(a)(ii)]. If no, then: Yes ___ No ❑ N/A _X_ RMK#___

i. Did the Permittee demonstrate to the director that removal of the waste within a 24-hour period was not possible, and that waste was removed at the earliest practicable time? [PC D.7.(a)(ii)] Yes ___ No ❑ N/A _X_ RMK#___

c. Remove all material released to secondary containment within 24 hours or in as timely manner as possible? [PC D.7.(a)(ii)] Yes ___ No ❑ N/A _X_ RMK#___

d. Immediately conduct a visual inspection of the release and prevent further migration of the leak or spill to soils or surface water, and remove and properly dispose of any visible contamination? [PC D.7.(a)(iii)] Yes ___ No ❑ N/A _X_ RMK#___

e. Rinse the area of the spill along with the collection sump, if impacted by the release? [PC D.7.(a)(iii)] Yes ___ No ❑ N/A_X_ RMK#___

NOTE: ***The rinseate must be analyzed and managed using the universal treatment standards. The completed remediation must obtain Ohio EPA approval before the tank system is placed back into service. [PC D.7.(a)(iii)]***

29. Has the Permittee closed the tank system when a leak or spill has occurred from the tank system, from a secondary containment system, or if the system becomes unfit for use? [PC D.7.(b)] Yes ___ No ❑ N/A _X_ RMK#___

Have the following requirements been met prior to returning the tank system back into service?

a. The Permittee has removed the released waste and made any necessary repairs to the system for a release caused by a spill that has not damaged the integrity of the system? [PC D.7.(b)(i)] Yes ___ No ❑ N/A _X_ RMK#___

b. The Permittee has repaired the primary system for a release caused by a leak from the primary tank system to the secondary containment system? [PC D.7.(b)(ii)] Yes ___ No ❑ N/A _X_ RMK#___

c. The Permittee has provided secondary containment for the entire component that meets the requirements of OAC Rule 3745-55-93 for a release to the environment caused by a leak from the portion of the tank system component that is not readily available for visual inspection? [PC D.7.(b)(iii)] Yes ___ No ❑ N/A _X_ RMK#____

NOTE: ***If the Permittee replaces a component of the tank system to eliminate the leak, that component must satisfy the requirements for new tank systems or components in OAC Rules 3745-55-92 and 3745-55-93. [PC D.7.(b)(iv)]***

NOTE: ***If a tank system has been repaired to eliminate a leak or to restore the integrity of the tank system, (e.g., installation of an internal liner, repair of a ruptured tank, or repair or replacement of a secondary containment vault), then the tank system shall not be returned to service unless the Permittee has obtained a certification in accordance with the certification requirements of OAC Rule 3745-50-42(D)(1) that the repaired system is capable of handling hazardous wastes without release for the intended life of the system. [PC D.7.(c)]***

30. Was the above noted certification submitted to the director within 7 days after returning the tank system to use (if needed)? [PC D.7.(c)] Yes ___ No ❑ N/A _X_ RMK#____

RECORDKEEPING AND REPORTING

31. Did the Permittee report to the director any leak or spill to the environment from the tank system or secondary containment system within 24 hours of detection? [PC D.8.(a)] Yes ___ No ❑ N/A _X_ RMK#____

NOTE: ***A leak or spill of one pound or less of hazardous waste, that is immediately contained and cleaned up, need not be reported. Releases that are contained within a secondary containment system need not be reported. [PC D.8.(a)]***

32. Within 30 days of detection of release, did the Permittee submit a report to the director? [PC D.8.(b)] Yes ___ No ❑ N/A _X_ RMK#____

If yes, then did the report contain the following information:

a. Likely route of migration of the release? [PC D.8.(b)(i)] Yes ___ No ❑ N/A _X_ RMK#____

b. Characteristics of the surrounding soil? [PC D.8.(b)(ii)] Yes ___ No ❑ N/A _X_ RMK#____

c. Results of any monitoring or sampling conducted in connection with the release (if available)? [PC D.8.(b)(iii)] Yes ___ No ❑ N/A _X_ RMK#____

NOTE: ***If sampling or monitoring data relating to the release are not available within 30 days, then the Permittee shall submit a schedule to the director prior to the expiration of the original submittal period. [PC D.8.(b)(iii)]***

d. Proximity to downgradient drinking water, surface water, and populated areas? [PC D.8.(b)(iv)] — Yes ___ No ❑ N/A _X_ RMK#___

e. Description of response actions taken or planned? [PC D.8.(b)(v)] — Yes ___ No ❑ N/A _X_ RMK#___

33. Does the Permittee obtain and keep on file at the facility, written statements by those persons required to certify the design and installation of the tank system? [PC D.8.(c)] — Yes _X_ No ❑ N/A ___ RMK#___

34. Does the Permittee keep on file at the facility the written assessment of the tank system's integrity? [PC D.8.(d)] — Yes _X_ No ❑ N/A ___ RMK#___

35. Does the Permittee keep all reports summarizing the inspection and assessment of tank condition and shell thickness/comparability as part of the facility's operating record? [PC D.8.(f)] — Yes _X_ No ❑ N/A ___ RMK#___

CLOSURE AND POST-CLOSURE CARE

36. Has the Permittee followed the procedures in the closure plan in Section I of the permit application at the closure of the tank system(s)? [PC D.9.(a)] — Yes ___ No ❑ N/A _X_ RMK#___

37. Has the Permittee demonstrated that not all contaminated soil can be practically removed or decontaminated, in accordance with the closure plan? [PC D.9.(b)] If yes, then: — Yes ___ No ___ N/A _X_ RMK#___

a. Has the Permittee closed the tank system(s) and performed post-closure care following the contingent procedures in the closure plan and post-closure plan? [PC D.9.(b)] — Yes ___ No ❑ N/A _X_ RMK#___

SPECIAL TANK PROVISIONS FOR IGNITABLE OR REACTIVE WASTES

38. Has the Permittee placed ignitable or reactive waste in a tank system or secondary containment system? [PC D.10.(a)] If yes, then? — Yes ___ No _X_ N/A ___ RMK#___

a. Was the waste stored in such a way that it was excluded from any material or conditions that may cause the waste to ignite or react? [PC D.10.(a)(i)] — Yes ___ No ❑ N/A _X_ RMK#___

b. Was the tank solely used for emergencies? [PC D.10.(a)(ii)] — Yes ___ No ❑ N/A _X_ RMK#___

c. Was the tank designed and constructed for the purpose of storing ignitable or reactive waste and meets applicable fire codes? [PC D.10.(a)(iii)] — Yes ___ No ❑ N/A _X_ RMK#___

d. Was documentation for compliance with this condition placed in the operating record? [PC D.10.(a)(iv)] — Yes ___ No ❑ N/A _X_ RMK#___

39. Does the Permittee comply with the requirements of protective distances between waste management areas and any public ways, streets, alleys, or an adjoining property line that can be built upon, per the NFPA requirement, incorporated by reference in OAC Rule 3745-50-11. [PC D.10.(b)] — Yes _X_ No ❑ N/A ___ RMK#___

SPECIAL TANK PROVISIONS FOR INCOMPATIBLE WASTES

40. Has the Permittee placed incompatible waste and/or materials in the same tank system or secondary containment system, not following the procedures specified in OAC Rule 3745-55-99(A)? [PC D.11.(a)] — Yes ❑ No_X_ N/A ___ RMK#___

41. Has the Permittee placed hazardous waste in a tank system that has not been decontaminated and that previously held an incompatible waste or material without meeting the requirements of PC D.11.(a) and OAC Rule 3745-54-17(B)? [PC D.11.(b)] — Yes ❑ No_X_ N/A ___ RMK#___

MODULE F – STABILIZATION / CONTAINMENT BUILDING (SCB)

STORAGE / QUANTITY LIMITATION

1. Does the Permittee store no more than 515 cubic yards of hazardous waste at any given time in the SCB? [PC F.1.(a)] — Yes _X_ No ❑ N/A ___ RMK#___

2. Does the Permittee store hazardous waste in the manner described below: [PC F.1.(a)]

   a. In compliance with Section D of the Permit Application? — Yes _X_ No ❑ N/A ___ RMK#___

   b. The identity of the contents clearly marked on each area/bin which contains hazardous waste restricted from land disposal? — Yes _X_ No ❑ N/A ___ RMK#___

   c. The date each period of accumulation began clearly marked on each area/bin which contains hazardous waste restricted from land disposal? — Yes _X_ No ❑ N/A ___ RMK#___

NOTE: ***Permit conditions F.1.(a) and F.2. shall not apply to the Permittee's activities as a generator accumulating hazardous waste on-site. However, when accumulating waste within the permitted SCB, in accordance with OAC Rule 3745-52-34, the Permittee must not, for the total amount of hazardous waste stored and accumulated, exceed the maximum SCB inventory established under this PC. [PC F.1.(b)]***

TREATMENT LIMITATIONS

3. Does the Permittee ensure that hazardous wastes are stabilized and/or solidified at a rate no greater than 150 tons per hour, or 250,000 tons in any calendar year (whichever is less)? [PC F.2.(a)] — Yes _X_ No ❑ N/A ___ RMK#___

4. Prior to accepting any waste stream for stabilization or encapsulation treatment, or prior to submitting a WPR form to Ohio EPA, does the Permittee conduct a pre-acceptance analysis for each such waste stream and submit analytical/treatment reports along with the WPR package? [PC F.2.(b)]. If yes, then do the reports contain: — Yes _X_ No ❑ N/A ___ RMK#___

   a. Waste code designation and analytical data showing its constituents (quantitatively)? [PC F.2.(b)(i)] — Yes _X_ No ❑ N/A ___ RMK#___

   b. The exact type, sequence, and/or combination of treatment methods designated for said wastes? [PC F.2.(b)(ii)] — Yes _X_ No ❑ N/A ___ RMK#___

c. Bench scale test data showing the composition of treatment reagents, waste material, or filler materials added to the waste, contact time, operating parameters to be monitored, safety precautions and measures, final product analysis? [PC F.2.(b)(iii)] Yes _X_ No ❑ N/A ___RMK#___

d. Test results from analysis conducted to meet TCLP, LDR, and any other applicable requirements prior to disposal? [PC F.2.(b)(vi)] Yes _X_ No ❑ N/A ___RMK#___

NOTE: ***WPR approval by Ohio EPA will not relieve the Permittee of their responsibility to treat, store, or dispose of hazardous waste in an environmentally safe manner. [PC F.2.(c)]***

5. Data showing that dilution did not occur during treatment for each grab and hold stabilization batch processed? [PC F.2.(d)] Yes _X_ No ❑ N/A ___RMK#___

6. Notification of any additions made to the stabilization/solidification referenced in Appendix C.13 of Volume 7 of the approved application, and submittal of any relevant technical and analytical data supporting the effectiveness of the treatment additives? [PC F.2.(e)] Yes _X_ No ❑ N/A ___RMK#___

WASTE IDENTIFICATION

7. Does the Permittee treat only those hazardous wastes listed in the part A Permit Application in the SCB? [PC F.3.] Yes _X_ No ❑ N/A ___RMK#___

DESIGN AND CONSTRUCTION STANDARDS

8. Is the SCB completely enclosed with a floor, walls, and a roof? [PC F.4.(a)] Yes_X_ No ❑ N/A ___RMK#___

9. Are the floor and containment walls, including the secondary containment system designed and constructed of materials of sufficient strength and thickness to support themselves, the waste contents, and any personnel and heavy equipment? [PC F.4.(b)] Yes_X_ No ❑ N/A ___RMK#___

10. Are the floor and containment walls, including the secondary containment system designed and constructed to prevent failure due to the following: [PC F.4.(b)]

a. Pressure gradients, settlement, compression, or uplift? Yes _X_ No ❑ N/A ___RMK#___

b. Physical contact with wastes to which they are exposed? Yes _X_ No ❑ N/A ___RMK#___

c. Climatic conditions? Yes _X_ No ❑ N/A ___RMK#___

d. Stresses of daily operation, including movement of heavy equipment and contact of the equipment with the containment walls? Yes _X_ No ❑ N/A ___RMK#___

11. Is the SCB designed so that it has sufficient structural strength to prevent collapse or other failure? [PC F.4.(c)] Yes _X_ No ❑ N/A ___RMK#___

12. Are all surfaces of the SCB chemically compatible with the hazardous wastes that come in contact with them? [PC F.4.(d)] Yes _X_ No ❑ N/A ___RMK#___

13. Has an exception to the structural strength requirements for light-weight doors and windows been made? [PC F.4.(e)] Yes _X_ No___ N/A___RMK#___
If yes, then:

a. Do the doors and windows provide an effective barrier against fugitive dust emissions? [PC F.4.(e)(i)] Yes _X_ No ❑ N/A ___RMK#___

b. Is the SCB designed and operated in a manner that assures that waste will not penetrate these openings when they are closed? [PC F.4.(e)(ii)] Yes _X_ No ❑ N/A ___RMK#___

14. Are incompatible hazardous wastes or treatment reagents that could cause leaking, corrosion, or failure placed into the SCB or secondary containment system? [PC F.4.(f)] Yes ❑ No_X_N/A ___RMK#___

15. Is the primary barrier designed to withstand movement of personnel, waste and handling equipment during the operating life of the SCB? [PC F.4.(g)] Yes _X_ No ❑ N/A ___RMK#___

16. Is the primary barrier appropriate for the physical and chemical characteristics of the waste to be managed in the SCB? [PC F.4.(g)] Yes _X_ No ❑ N/A ___RMK#___

17. Is the primary barrier designed and constructed of materials to prevent the migration of hazardous constituents into the barrier? [PC F.4.(h)] Yes _X_ No ❑ N/A ___RMK#___

18. Does the liquid collection and removal system meet the following specifications, to minimize the accumulation of liquid on the primary barrier of the SCB? [PC F.4.(i)]

a. Is the primary barrier sloped to drain liquids to the associated collection system? [PC F.4.(i)(i)] Yes _X_ No ❑ N/A ___RMK#___

b. Are liquids and waste collected and removed to minimize hydraulic head on the containment system at the earliest practicable time? [PC F.4.(i)(ii)] Yes _X_ No ❑ N/A ___RMK#___

19. Is the secondary containment system including a secondary barrier designed and constructed to prevent migration of hazardous constituents into the barrier? [PC F.4.(j)] — Yes _X_ No ❑ N/A ___ RMK#___

20. Is the leak detection system capable of detecting failure of the primary barrier and collecting accumulated hazardous wastes and liquids at the earliest practicable time? [PC F.4.(j)] — Yes _X_ No ❑ N/A ___ RMK#___

21. Is the leak detection system constructed to meet the following design specifications? [PC F.4.(k)]

a. A bottom slope of one percent or more? — Yes _X_ No ❑ N/A ___ RMK#___

b. Granular drainage material with a hydraulic conductivity of $1x10^{-2}$ cm/sec or more? — Yes _X_ No ❑ N/A ___ RMK#___

c. Granular drainage material with a thickness of 12 inches (30.5 cm) or more? — Yes _X_ No ❑ N/A ___ RMK#___

d. A constructed or synthetic drainage layer with transmissivity of $3x10^{-5}$ m^2/sec or more? — Yes _X_ No ❑ N/A ___ RMK#___

22. Have measures been designed to prevent the release of liquids, wet materials, or liquid aerosols to other portions of the building in areas where treatment is conducted within the SCB? [PC F.4.(l)] — Yes _X_ No ❑ N/A ___ RMK#___

23. Is the secondary containment system constructed of materials that are chemically resistant to the waste and liquids managed in the SCB? [PC F.4.(m)] — Yes _X_ No ❑ N/A ___ RMK#___

24. Does the secondary containment system have sufficient strength and thickness to prevent collapse under the pressure exerted by overlaying materials and by any equipment used in the SCB? [PC F.4.(m)] — Yes _X_ No ❑ N/A ___ RMK#___

25. Does the secondary containment system meet the requirements of paragraphs (B), (c)(1), and (c)(2) of OAC Rule 3745-55-93 for a tank? [PC F.4.(n)] — Yes _X_ No ❑ N/A ___ RMK#___

26. Does the Permittee operate and maintain a run-on control system capable of preventing flow into the SCB, onto the outside containment pads, and onto the active portion of the SCB during a 25 year-24 hour storm? [PC F.4.(o)] — Yes _X_ No ❑ N/A ___ RMK#___

27. Does the Permittee maintain a baghouse, or an equivalent device on all Air Pollution Control Systems located in the SCB? [PC F.1.(d)] — Yes_X_ No ❑ N/A ___ RMK#___

Are the following activities completed for the Air Pollution Control System and components?

a. Are all performance test results available on-site as part of the operating record? Yes _X_ No ❑ N/A ___RMK#___

b. Are performance evaluations conducted on a yearly basis during the operating life of the SCB? Yes _X_ No ❑ N/A ___RMK#___

c. Are vents and ducts inspected not less than annually? Yes _X_ No ❑ N/A ___RMK#___

d. Are records of these inspections maintained on site? Yes _X_ No ❑ N/A ___RMK#___

OPERATING STANDARDS

28. Does the Permittee use controls and practices to ensure containment of hazardous wastes within the SCB, which at a minimum include: [PC F.5.(a)]

a. Maintain the primary barrier to be free of significant cracks, gaps, corrosion, or other deterioration that could cause hazardous waste to be released? [PC F.5.(a)(i)] Yes _X_ No ❑ N/A ___RMK#___

b. Maintain the level of the stored/treated hazardous waste within the containment walls so that the waste does not exceed the height of the wall? [PC F.5.(a)(ii)] Yes ___ No _X_ N/A ___ RMK# 30

c. Take measures to prevent tracking of hazardous waste out of the building by personnel or equipment, including trucks off-loading waste? [PC F.5.(a)(iii)] Yes ___ No _X_ N/A ___ RMK# 31

d. Does the Permittee inspect the SCB entrance apron within 15 minutes after a hazardous waste transportation vehicle leaves the SCB and remove all tracked or fallen waste at the time of the inspection? [PC F.5.(a)(iii)(a)] Yes ___ No _X_ N/A ___ RMK# 32

e. Does the Permittee inspect the containment pads around the SCB by the end of each day's use and remove all tracked or fallen waste at the time of the inspection? [PC F.5.(a)(iii)(a)] Yes ___ No _X_ N/A ___ RMK# 33

f. Does the Permittee maintain a log recording all inspections of and any actions taken at the entrance aprons and containment pads? [PC F.5.(a)(iii)(b)] Yes ___ No _X_ N/A ___ RMK# 34

g. Does the Permittee take measures to control fugitive dust emissions such that all openings exhibit no visible emissions at all times? [PC F.5.(a)(iv)] Yes _X_ No ❑ N/A ___RMK#___

h. Does the SCB remain closed at all times except when vehicles, personnel, or equipment are entering or exiting the building? [PC F.5.(a)(v)] Yes _X_ No ❑ N/A ___RMK#___

i. Is the truck unloading side of the building equipped with a slip curtain to control wind dispersal? [PC F.5.(d)(ii)] Yes _X_ No ❑ N/A ___RMK#___

i. Is the split screen inspected periodically and repaired or replaced as needed? [PC F.5.(d)(ii)] Yes _X_ No ❑ N/A ___RMK#___

j. Does the Permittee apply a conditioner/wetter to all dusty treatment reagents, wastes, or stabilized materials used in the SCB to control fugitive dust emissions? [PC F.5.(d)(iii)] Yes _X_ No ❑ N/A ___RMK#___

29. Has the Permittee maintained a certification by a qualified registered professional engineer that the SCB design meets OAC Rule 3745-205-101(A) to (C)(4)? [PC F.5.(b)] Yes _X_ No ❑ N/A ___RMK#___

30. Does the Permittee repair, promptly upon detection, any condition that could lead to or has caused a release of hazardous waste in accordance with OAC Rule 3745-205-101(C)(3)(a) through (c)? [PC F.5.(c)] Yes _X_ No ❑ N/A ___RMK#___

31. Does the Permittee operate no more than two pneumatic truck unloading stations at the SCB that meet the design and operation requirements in Section D of the permit application? [PC F.5.(d)] Yes _X_ No ❑ N/A ___RMK#___

32. Has the Permittee unloaded more than 24 pneumatic tank trucks per day? [PC F.5.(d)] Yes ❑ No_X_N/A ___RMK#___

33. Does the Permittee maintain and operate the primary liquid collection and removal system to collect and remove liquids that may be potentially contaminated from the SCB? [PC F.5.(e)] Yes _X_ No ❑ N/A ___RMK#___

34. Does the Permittee operate the primary leachate collection system in a manner that allows the system to function without clogging through closure of the SCB? [PC F.5.(e)] Yes _X_ No ❑ N/A ___RMK#___

35. Does the Permittee maintain and operate the secondary liquid collection and detection system for the purpose of monitoring and removing any liquid that could pass through the concrete and the primary liner? [PC F.5.(e)] Yes _X_ No ❑ N/A ___RMK#___

36. Does the Permittee expeditiously remove all accumulated liquids and solid materials from collection and holding sumps located in the SCB, and on the containment pads outside of the SCB? [PC F.5.(f)] Yes_X_ No ❑ N/A ___RMK#___

37. Is each sump inspected on a daily basis (operating day), and after storm events for the purpose of monitoring the accumulated water level? [PC F.5.(f)] Yes _X_ No ❑ N/A ___RMK#____

38. Is all water removed from the run-off collection system treated as potentially contaminated? [PC F.5.(f)] Yes _X_ No ❑ N/A ___RMK#____

39. Has the Permittee maintained and operated the SCB sumps by completing the following: [PC F.5.(f)]

a. Remove material from the sumps when the material has reached the bottom of the grate? [PC F.5.(f)(i)] Yes _X_ No ❑ N/A ___RMK#____

b. Clean out the sumps within the SCB once each calendar month regardless of the amount of material accumulated in the sump? [PC F.5.(f)(i)] Yes _X_ No ❑ N/A ___RMK#____

c. Record in the operating record the dates when material is removed from the sumps? [PC F.5.(f)(ii)] Yes _X_ No ❑ N/A ___RMK#____

d. Note on daily inspection forms any amount of material that is observed within the sumps at the time of inspection and if removal of material is necessary? [PC F.5.(f)(ii)] Yes _X_ No ❑ N/A ___RMK#____

e. Note on the daily inspection log, in the event the liquids in the sump are frozen, that accumulated liquids are in the sump and the time of discovery? [PC F.5.(f)(iii)] Yes_X_ No ❑ N/A ___RMK#____

f. Remove the frozen liquid when thawed or by other means that will not compromise the integrity of the sump and note in the daily inspection log the date and time the material was removed? [PC F.5.(f)(iii)] Yes_X_ No ❑ N/A ___RMK#____

40. Does the Permittee ensure that the amount of liquid used in the stabilization process is based upon treatment formulations from bench scale results and/or from existing documented information from similar processes of similar wastes when the presence of an aqueous phase is the appropriate active ingredient? [PC F.5.(g)] Yes _X_ No ❑ N/A ___RMK#____

41. Does the Permittee ensure that D001 ignitable liquid wastes are not managed in the chemical stabilization process unless such wastes can be effectively treated? [PC F.5.(h)] Yes _X_ No ❑ N/A ___RMK#____

NOTE: ***Effective treatment is described as the removal of the characteristic of ignitability by either destroying or removing the organic constituents that gave the waste its ignitable characteristic. Destruction is not achieved through dilution. [PC F.5.(h)]***

42. Has the Permittee maintained a central carbon absorption or equivalent system to control organic emissions from the SCB? [PC F.5.(i)] — Yes _X_ No ❑ N/A ___RMK#____

43. Does the Permittee ensure that it does not place incompatible hazardous waste or treatment reagents in the SCB or its secondary containment system that could cause the unit or secondary containment system to leak, corrode, or otherwise fail? [PC F.5.(j)] — Yes_X_ No ❑ N/A ___RMK#____

44. After each shipment of hazardous waste is received, and has been place into storage, does the Permittee label the hazardous waste storage area with the following information: [PC F.5.(k)]

a. Waste type and description? [PC F.5.(k)(i)] — Yes _X_ No ❑ N/A ___RMK#____

b. ESOI load number and/or container sequence number (for on-site generated waste)? [PC F.5.(k)(iii)] — Yes _X_ No ❑ N/A ___RMK#____

c. Generator name? [PC F.5.(k)(iv)] — Yes _X_ No ❑ N/A ___RMK#____

d. Waste Stream Identification Number? [PC F.5.(k)(v)] — Yes _X_ No ❑ N/A ___RMK#____

LEAK DETECTION FOR THE SCB

45. Does the Permittee inspect and record in the operating record, at least once every seven days, data gathered from monitoring equipment and leak detection equipment as well as the SCB and the surrounding area to detect signs of release of hazardous waste? [PC F.6.(a)] — Yes_X_ No ❑ N/A ___RMK#____

46. Has the Permittee followed the SCB-RAP for the detection, mitigation, notification, and reporting for leakage into the leak detection system as found in Appendix D.22 of the permit application? [PC F.6.(b)] — Yes _X_ No ❑ N/A ___RMK#_35__

INSPECTIONS

47. Does the Permittee inspect the SCB in accordance with the schedule in Section F of the permit application, PC B.5.(g), and OAC Rule 3745-54-15? [PC F.7.] — Yes _X_ No ❑ N/A ___RMK#____

48. Does the Permittee inspect and record in the facility's operating record, at least once every seven days, data gathered from monitoring equipment and leak detection equipment as well as the SCB and the area immediately surrounding the SCB to detect signs of releases of hazardous waste? [PC F.7.] — Yes _X_ No ❑ N/A ___RMK#____

a. Does the Permittee note the results of the above inspections in the inspection log along with any remedial action taken? [PC F.7.] — Yes _X_ No ❑ N/A ___RMK#___

49. Has the Permittee complied with all record keeping requirements in OAC Rule 3745-54-73 and maintained the operating record with these documents? [PC F.8.(a)] — Yes _X_ No ❑ N/A ___RMK#___

50. After each shipment of hazardous waste is received, and has been place into storage, does the Permittee log into a storage area daily report, the following information: [PC F.8.(b)]

a. Quantity of waste? [PC F.8.(b)(i)] — Yes _X_ No ❑ N/A ___RMK#___

b. Waste type and description? [PC F.8.(b)(ii)] — Yes _X_ No ❑ N/A ___RMK#___

c. Date received into storage area? [PC F.8.(b)(iii)] — Yes _X_ No ❑ N/A ___RMK#___

d. Location (by storage area)? [PC F.8.(b)(iv)] — Yes _X_ No ❑ N/A ___RMK#___

e. Date removed from storage area? [PC F.8.(b)(v)] — Yes _X_ No ❑ N/A ___RMK#___

f. ESOI load number and/or container sequence number? [PC F.8.(b)(vi)] — Yes _X_ No ❑ N/A ___RMK#___

g. Generator name? [PC F.8.(b)(vii)] — Yes _X_ No ❑ N/A ___RMK#___

h. Waste Stream Identification Number (WSID)? [PC F.8.(b)(viii)] — Yes _X_ No ❑ N/A ___RMK#___

IGNITABLE OR REACTIVE WASTE PROVISIONS

51. Does the Permittee store ignitable or reactive waste in accordance with OAC Rule 3745-54-17? [PC F.9.(a)] — Yes _X_ No ❑ N/A ___RMK#___

52. Does the Permittee take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and follow the storage or treatment procedures specified in Section D of the permit application? [PC F.9.(b)] — Yes _X_ No ❑ N/A ___RMK#___

ENCAPSULATION TECHNOLOGY

53. Does the Permittee perform encapsulation technology on waste that is debris based upon visual inspection? [PC F.10.(a)] — Yes _X_ No ❑ N/A ___RMK#___

54. Does the Permittee ensure that it does not perform encapsulation technology on waste that the Permittee knows, or reasonably should know, has been deliberately mixed with non-debris waste by the generator in order to avoid numerical and technical treatment standards under OAC Rule 3745-270? [PC F.10.(a)(i)] — Yes _X_ No ❑ N/A ___RMK#___

55. Is all hazardous waste the Permittee treats with encapsulation technology authorized in the Ohio Part A Application? [PC F.10.(a)(ii)] — Yes _X_ No ❑ N/A ___RMK#___

56. Is the Permittee performing encapsulation treatment in accordance with Section D.5.(i) through D.5.(l) of the permit application? [PC F.10.] — Yes _X_ No ❑ N/A ___RMK#___

57. Does the Permittee use only material compatible with the waste being encapsulated as an encapsulating agent? [PC F.10.(b)] — Yes _X_ No ❑ N/A ___RMK#___

58. Does the Permittee ensure that it does not use materials that will cause an adverse reaction with or otherwise degrade significantly when exposed to the waste? [PC F.10.(b)] — Yes _X_ No ❑ N/A ___RMK#___

59. Has the Permittee performed a quality control check on all waste that undergoes encapsulation treatment? [PC F.10.(c)]. — Yes _X_ No ❑ N/A ___RMK#___

Micro Encapsulation

60. Does the Permittee ensure, via visual inspection, that all waste that is micro encapsulated in bulk is sufficiently coated with treatment reagents and allowed to cure? [PC F.10.(c)(i)(b)] — Yes_X_ No ❑ N/A ___RMK#___

61. Does the Permittee inspect a minimum number of micro encapsulation boxes based on the cube root of the number of boxes present or 10% of the boxes, whichever is greater, as determined by ESOI load number or WSID? [PC F.10.(c)(i)(a)] — Yes _X_ No ❑ N/A ___RMK#___

Macro Encapsulation

62. Does the Permittee use storage and handling pallets that are larger than the containers used in the process? [PC F.10.(c)(ii)(a)] — Yes ___ No ❑ N/A _X_ RMK# 36

63. Does the Permittee use structural supports, when appropriate, around the macro encapsulation container to prevent rupture of the LDPE liner? [PC F.10.(c)(ii)(b)] — Yes ___ No ❑ N/A _X_ RMK# 36

64. Is the Permittee careful not to overfill the macro encapsulation containers due to the possibility of causing rupture of the LDPE liner? [PC F.10.(c)(ii)(b)] — Yes ___ No ❑ N/A _X_ RMK# 36

65. Does the Permittee inspect for damage to the macro encapsulation container liner (containers with damaged liners shall be reprocessed)? [PC F.10.(c)(ii)(c)] — Yes ___ No ❑ N/A _X_ RMK# 36

CLOSURE AND POST-CLOSURE

66. Has the Permittee removed or decontaminated all hazardous waste and hazardous waste residues, contaminated containment system components, contaminated subsoils, and structures and equipment contaminated with waste and leachate, in accordance with the procedures in the closure plan in Section I of the permit application? [PC F.11.]

Yes ___ No ❑ N/A _X_ RMK# 37__

MODULE G – MONITORING PROGRAM – CITY OF TOLEDO LOW PRESSURE RAW WATERLINE SECURITY TRENCHES

SECURITY AGREEMENT

1 Has the Permittee continued to be a party to the Waterline Security Agreement (Agreement) with the City of Toledo found in Appendix B.2 of the permit application? [PC G.1.(a)] — Yes _X_ No ❑ N/A ___ RMK#___

2. Does the Permittee remove and dispose liquids in accordance with the Agreement and applicable regulations? [PC G.1.(b)] — Yes _X_ No ❑ N/A ___ RMK#___

3. Has the Permittee allowed access to the waterline easement to the City of Toledo, Division of Environmental Services, to conduct appropriate testing and monitoring to determine compliance with the Agreement during all normal and customary facility operating hours? [PC G.1.(c)] — Yes _X_ No ❑ N/A ___ RMK#___

4. Has the Permittee, within 90 days of permit issuance, submitted a class 1 permit modification, in accordance with OAC Rule 3745-50-51, listing the various analytical methods utilized to evaluate the constituents listed in Table G-1 below? [PC G.2.] — Yes _X_ No ❑ N/A ___ RMK#___

TRENCH MONITORING AND DATA VALIDATION

NOTE: ***Monitoring trenches are defined as those trenches which have not exceeded limits for any of the constituents listed in Table G-1. Likewise, dewatering trenches are defined as those trenches which have historically exhibited constituent levels at or above the limits defined in Table G-1. [PC G.3.]***

5. Has the Permittee withdrawn a sample from each monitoring trench on a semi-annual basis and analyzed the samples for the constituents listed in Table G-1? [PC G.3.(a)] — Yes _X_ No ❑ N/A ___ RMK#___

   a. If the analysis shows a constituent at or above the specified limit, has the Permittee either designated the trench as a dewatering trench or taken a confirmation sample within 30 days of receipt of the original results? [PC G.3.(a)(i)] — Yes ___ No ❑ N/A _X_ RMK#___

   b. If the analysis and the confirmation analysis shows a constituent at or above the specified limit, has the Permittee designated the monitoring trench as a dewatering trench? [PC G.3.(a)(ii)] — Yes ___ No ❑ N/A _X_ RMK#___

6. Does the Permittee keep liquid levels in the dewatering trenches below the bottom of the adjacent waterline? [PC G.3.(b)] — Yes _X_ No ❑ N/A ___ RMK#_38_

7. Does the Permittee monitor the liquid level in each dewatering trench in accordance with the inspection schedule found in PC G.4.? [PC G.3.(b)] (once per week) — Yes _X_ No ❑ N/A ___ RMK#___

8. Has the Permittee notified the director, in writing, within 14 days of determining that a monitoring trench must be designated a dewatering trench? [PC G.3.(b)] — Yes ___ No ❑ N/A _X_ RMK#___

INSPECTIONS

9. Does the Permittee inspect the following, at least weekly for: [PC G.4.(a)]

   a. The waterline easement boundaries for potential degradation and/or damage to the cover system of nearby waste management units? [PC G.4.(a)(i)] — Yes _X_ No ___ N/A ___ RMK#___

   b. The monitoring trench cap for erosion and/or damage? [PC G.4.(a)(ii)] — Yes _X_ No ___ N/A ___ RMK#___

   c. The collection sumps for damage? [PC G.4.(a)(iii)] — Yes _X_ No ___ N/A ___ RMK#___

   d. The City of Toledo easement for evidence of leakage from the waterlines? [PC G.4.(a)(iv)] — Yes _X_ No ___ N/A ___ RMK#___

   e. The presence of liquid in the trenches? [PC G.4.(a)(v)] — Yes _X_ No ___ N/A ___ RMK#___

10. Has the Permittee notified Ohio EPA within 24 hours, documenting any damage to waste management unit cover systems, monitoring trench caps, or to the collection sumps after being observed during the weekly inspections and documenting them on the inspection form, and making necessary repairs within 30 days? [PC G.4.(b)] — Yes ___ No ❑ N/A _X_ RMK#___

11. Has the Permittee notified the City of Toledo and Ohio EPA within 24 hours of observing evidence of leakage from the waterlines during the weekly inspections? [PC G.4.(c)] — Yes _X_ No ❑ N/A ___ RMK#___

RECORDKEEPING AND REPORTING

12. Did the Permittee submit a monitoring trench report containing the analytical results from the constituents listed in Table G-1 (due 30 days after receipt of all analytical data and data validation) to Ohio EPA and the City of Toledo? [PC G.5.(a)] — Yes _X_ No ❑ N/A ___ RMK#___

13. Did the Permittee submit to Ohio EPA a monthly report detailing the amount of liquids removed from each trench and the dates of dewatering? [PC G.5.(b)] — Yes _X_ No ❑ N/A ___ RMK#___

MODULE I – POST-CLOSURE CARE REQUIREMENTS

POST-CLOSURE PROCEDURES AND USE OF PROPERTY

1. Does the Permittee conduct post-closure care for each hazardous waste management unit listed in PC I.1, to begin after completion of closure of the unit and continue for 30 years after that date? [PC I.2.(a)] — Yes X No ❑ N/A ___ RMK# 23

NOTE: ***The 30-year post-closure care period may be shortened upon application and demonstration approved by Ohio EPA that the reduced period is sufficient to protect human health and the environment. The 30-year post-closure care period may be extended if the director finds that the extended period is necessary to protect human health and the environment. [PC I.2.(a)]***

2. Does the Permittee maintain and monitor the ground water monitoring system and comply with all other applicable requirements of OAC Rule 3745-54-90 through 3745-54-100 during the post-closure period? [PC I.2.(b)] — Yes X No ❑ N/A ___ RMK#___

3. Does the Permittee monitor the ground water in accordance with Module K, Integrated Ground Water Monitoring Program? [PC I.2.(b)] — Yes X No ❑ N/A ___ RMK#___

LANDFILL REQUIREMENTS

4. Does the Permittee maintain the integrity and effectiveness of the final cover, including making repairs to the cap, to correct the effects of settling, subsidence, erosion, or other events? [PC I.2.(d)(i)] — Yes X No ❑ N/A ___ RMK# 39

5. Has the Permittee continued to operate the leachate collection and removal system until leachate is no longer detected? [PC I.2.(d)(ii)] — Yes X No ❑ N/A ___ RMK# 40

6. Are existing leachate systems operational and in good repair? [PC I.2.(d)(ii)] — Yes X No ❑ N/A ___ RMK#___

7. Is the leachate system inspected monthly and repaired if required? [PC I.2.(d)(ii)] — Yes X No ❑ N/A ___ RMK#___

8. Does the Permittee remove any leachate that is found in the system and ship the leachate off-site to an approved TSDF? [PC I.2.(d)(ii)] — Yes X No ❑ N/A ___ RMK#___

9. Does the Permittee maintain pertinent information including origin of leachates, quantities, and analytical results in the facility's post-closure operating record? [PC I.2.(d)(ii)] — Yes X No ❑ N/A ___ RMK#___

10. Does the Permittee control run-on and run-off as to minimize eroding of the final cover? [PC I.2.(d)(iii)] — Yes X No ❑ N/A ___ RMK#___

11. Are erosion control structures maintained during post-closure care? [PC I.2.(d)(iii)(a)] — Yes _X_ No ❑ N/A ___ RMK#___

a. Is erosion damage repaired and corrected as it occurs? [PC I.2.(d)(iii)(a)] — Yes _X_ No ❑ N/A ___ RMK#___

12. Does the Permittee inspect the facility monthly, or after every major rainfall for erosion or pooling of water? [PC I.2.(d)(iii)(b)] — Yes _X_ No ❑ N/A ___ RMK#___

a. When found, is erosion or pooled water corrected? [PC I.2.(d)(iii)(b)] — Yes _X_ No ❑ N/A ___ RMK#___

13. Does the Permittee monitor and maintain erosion controls (slopes/vegetation) in accordance with the facility's approved post-closure care plan? [PC I.2.(d)(iii)(c)] — Yes _X_ No ❑ N/A ___ RMK#___

14. Are all surveyed benchmarks protected and maintained? [PC I.2.(d)(iv)] — Yes _X_ No ❑ N/A ___ RMK#___

GENERAL FACILITY CARE

15. Does the Permittee perform grass cutting and shrub care as needed (at least annually) [PC I.2.(d)(v)(a)] — Yes _X_ No ❑ N/A ___ RMK#___

a. Does the Permittee remove damaged or dead vegetation and replace with equivalent vegetation? [PC I.2.(d)(v)(a)] — Yes _X_ No ❑ N/A ___ RMK# 41

b. Does the Permittee prohibit the growth of trees, shrubs, or other deep-rooted plants on closed waste units? [PC I.2.(d)(v)(a)] — Yes _X_ No ❑ N/A ___ RMK#___

c. Does the Permittee repair and re-vegetate areas damaged by erosion? [PC I.2.(d)(v)(a)] — Yes _X_ No ❑ N/A ___ RMK#___

16. Has the Permittee removed trees, shrubs or other deep-rooted plants in the fall quarter of the year? [PC I.2.(d)(v)(a)] — Yes _X_ No ❑ N/A ___ RMK#___

17. Did the Permittee notify the Ohio EPA on-site inspector verbally, by letter, or by telephone at least 48 hours prior to beginning the removal of vegetation? [PC I.2.(d)(v)(a)] — Yes _X_ No ❑ N/A ___ RMK#___

NOTE: ***On-site staff at their discretion, can exempt the Permittee from the 48-hour notification requirement.***

18. Does the Permittee promptly repair any damage to the closed waste unit cover system caused by the growth or removal of trees, shrubs, or other deep-rooted plants? [PC I.2.(d)(v)(a)] — Yes _X_ No ❑ N/A ___ RMK#___

19. Are buildings located on the site maintained in good repair? [PC I.2.(d)(v)(b)] — Yes _X_ No ❑ N/A ___ RMK#___

a. Are all permits, fire codes, etc., maintained and complied with? [PC I.2.(d)(v)(b)] — Yes _X_ No ❑ N/A ___ RMK#___

20. Are existing roadways being maintained in good repair? [PC I.2.(d)(v)(c)] — Yes _X_ No ❑ N/A ___ RMK#___

21. Has the Permittee constructed any new roadways over any final cover areas? If so, — Yes ___ No _X_ N/A ___ RMK#___

a. Did the Permittee receive approval from Ohio EPA for such construction? [PC I.2.(d)(v)(c)] — Yes ___ No ❑ N/A _X_ RMK#___

22. Are roadways maintained, as necessary, during inclement weather as to provide access to all areas? [PC I.2.(d)(v)(c)] — Yes _X_ No ❑ N/A ___ RMK#___

23. Are all existing drainage ditches being maintained and kept free of debris? [PC I.2.(d)(v)(d)] — Yes _X_ No ❑ N/A ___ RMK#___

24. Has the Permittee constructed drainage ditches on closed hazardous waste areas or altered the drainage flow? If so, — Yes ___ No _X_ N/A ___ RMK#___

a. Did the Permittee obtain approval from Ohio EPA to make such changes? [PC I.2.(d)(v)(d)] — Yes ___ No ❑ N/A _X_ RMK#___

25. Are all utilities maintained operational? [PC I.2.(d)(v)(e)] — Yes _X_ No ❑ N/A ___ RMK#___

26. Are electrically operated security and monitoring devices equipped with an internal back-up power source to allow for operation in the event of a main power outage? [PC I.2.(d)(v)(e)] — Yes _X_ No ❑ N/A ___ RMK#___

27. Does the Permittee prohibit underground utility construction in areas used previously for hazardous waste disposal? [PC I.2.(d)(v)(e)] — Yes _X_ No ❑ N/A ___ RMK#___

SECURITY REQUIREMENTS

28. During the period of post-closure care, is the Permittee maintaining fencing, which prevents unauthorized entry into the facility? [PC I.2.(e)(i)] — Yes _X_ No ❑ N/A ___ RMK#___

a. Is the fencing inspected monthly? [PC I.2.(e)(i)] — Yes _X_ No ❑ N/A ___ RMK#___

b. Where necessary, is the fencing repaired or replaced if damage is found? [PC I.2.(e)(i)] — Yes _X_ No ❑ N/A ___ RMK# 42

29. Have all existing warning signs been inspected monthly, and maintained or replaced to meet the readability requirements described in the OAC Rule 3745-54-14(C)? [PC I.2.(e)(ii)] — Yes _X_ No ❑ N/A ___ RMK#___

30. Are all site entrance/exit gates maintained in operable condition and securely locked when not monitored by a gate keeper? [PC I.2.(e)(iii)] — Yes _X_ No ❑ N/A ___ RMK#____

a. Are gate locks inspected weekly? [PC I.2.(e)(iii)] — Yes _X_ No ❑ N/A ___ RMK#____

31. Are all ground water monitoring wells inspected weekly and equipped with locking caps? [PC I.2.(e)(iv)] — Yes _X_ No ❑ N/A ___ RMK#____

a. Do ground water monitoring well caps remain locked except when sampled? [PC I.2.(e)(iv)] — Yes _X_ No ❑ N/A ___ RMK#____

32. Has the Permittee noted any signs of unauthorized entry onto the premises? If so, then: — Yes ____ No _X_ N/A ___ RMK#____

b. Did the Permittee immediately notify the director? [PC I.2.(e)(v)] — Yes ___ No ❑ N/A _X_ RMK#____

c. Did the Permittee inspect the facility once per week for the month following the incident? [PC I.2.(e)(v)] — Yes ___ No ❑ N/A _X_ RMK#____

33. Does the Permittee prohibit disturbance of the integrity of the final cover, liners, or any other components of the containment system, or the function or the facility's monitoring systems use of the units designated in PC I.1. during post-closure care? [PC I.2.(f)] — Yes _X_ No ❑ N/A ___ RMK#____

34. Has the Permittee implemented the post-closure plan and completed all post-closure care activities in accordance with the provisions of it? [PC I.2.(g)] — Yes _X_ No ❑ N/A ___ RMK#____

INSPECTIONS, NOTICES, AND CERTIFICATIONS

35. Does the Permittee inspect the components, structures, and equipment at the facility in accordance with the inspection schedule found in the post-closure plan? [PC I.3.] — Yes _X_ No ❑ N/A ___ RMK#____

36. Did the Permittee submit a record of the type, location, and quantity of hazardous waste disposed of within each cell or other disposal unit of the facility to the local zoning authority, or authority with jurisdiction over local land use, and to the director? [PC I.4.(a)] — Yes _X_ No ❑ N/A ___ RMK#____

a. Was this record submitted no later than 60 days after certification of closure of each hazardous waste disposal unit? [PC I.4.(a)] — Yes _X_ No ❑ N/A ___ RMK#____

37. For hazardous wastes disposed of before January 12, 1981, did the Permittee identify the type, location, and quantity of the hazardous waste to the best of his knowledge and in accordance with any records that were kept? [PC I.4.(a)] — Yes _X_ No ❑ N/A ___ RMK#____

38. Within 60 days of certification of closure of the first and last hazardous waste disposal unit, did the Permittee record a notation on the deed to the facility property, including the information as specified in PC I.4.(b)(i)? Yes ___ No ❑ N/A _X_ RMK# _23_

39. Has the Permittee submitted a signed certification to the director, that he has recorded the above notation, including a copy of the document in which the notation was placed? [PC I.4.(b)(ii)] Yes ___ No ❑ N/A _X_ RMK# _23_

40. Has the Permittee requested a modification in accordance with OAC Chapter 3745-50 to remove hazardous waste and hazardous waste residues , the liner (if any), or contaminated soils? [PC I.4.(c)] Yes ___ No ❑ N/A _X_ RMK# 38

a. Did the removal of the hazardous wastes, specified above, satisfy the criteria of OAC Rule 3745-55-17(c)? [PC I.4.(c)] Yes ___ No ❑ N/A _X_ RMK#___

NOTE: ***By removing hazardous waste, the Permittee may become a generator of hazardous waste and must manage it in accordance with all applicable hazardous waste requirements.***

41. No later than 60 days after the completion of the established post-closure care period for each hazardous waste disposal unit, did the Permittee submit to the director a certification of completion of post-closure care in accordance with PC I.4.(d)? Yes ___ No ❑ N/A _X_ RMK# _37_

FINANCIAL ASSURANCE

42. Has the Permittee maintained financial assurance during the post-closure period and complied with all applicable requirements? [PC I.5.(a)] Yes _X_ No ❑ N/A ___ RMK#___

43. Has the Permittee demonstrated to the director that the value of the financial assurance mechanism exceeds the remaining cost of post-closure care, in order for the Director to approve a release of funds? [PC I.5.(b)] Yes _X_ No ❑ N/A ___ RMK#___

44. Has the Permittee submitted itemized bills to the director to request reimbursement for post-closure care? [PC I.5.(c)] Yes _X_ No ❑ N/A ___ RMK#___

POST-CLOSURE MODIFICATIONS

45. Has the Permittee made a permit modification request to authorize a change in the post-closure plan? If yes, then: Yes ___ No _X_ N/A ___ RMK#__

a. Was the request made in accordance with applicable requirements of OAC Rule 3745-50-40 through 3745-50-62? [PC I.6.] Yes ___ No ❑ N/A _X_ RMK#___

b.	Did the request include a copy of the proposed amended post-closure plan for Director approval? [PC I.6.]	Yes ___ No ❑ N/A _X_RMK#___
c.	Has a request been made whenever changes in the operating plans or facility design affecting the approved post-closure plan occur, there is a change in the expected year of final closure, or other events occur during the active life of the facility that affect the approved post-closure plan? [PC I.6.]	Yes ___ No ❑ N/A _X_RMK#___
d.	Is the request submitted at least 60 days prior to the proposed change in the facility design or operation, or no later than 60 days after an unexpected event has occurred which has affected the post-closure plan? [PC I.6.]	Yes ___ No ❑ N/A _X_RMK#___

MODULE J – CELL M LANDFILL REQUIREMENTS

WASTE DISPOSAL LIMITATIONS

1. Is the Permittee disposing only the hazardous wastes identified in Part A of the permit (or other wastes as authorized by Ohio EPA) into Cell M? [PC J.1.(a)] — Yes _X_ No ❑ N/A ___RMK#___

2. Is the Permittee in compliance with the WPR approval process described in the record? [PC J.1.(b)] — Yes _X_ No ❑ N/A ___RMK#___

3. Does the Permittee ensure that only wastes that have been granted approval by Ohio EPA through the WPR process are accepted? [PC J.1.(b)] — Yes _X_ No ❑ N/A ___RMK#___

4. Is the placement of waste in Cell M no less than 100 feet from the respective center lines of York Street and Otter Creek Road, 70 feet from the facility boundary, and 40 feet from the City of Toledo's waterlines? [PC J.1.(c)] — Yes _X_ No ❑ N/A ___RMK#___

5. Does the Permittee ensure that the following wastes are not accepted for landfill disposal:

   a. Any wastes containing free liquids as determined in accordance with PC B.3.(a)(vi), except lab packs? [PC J.1.(d)(i)] — Yes _X_ No ❑ N/A ___RMK#___

   b. Water reactive or pyrophoric wastes, except as specified in OAC Rule 3745-57-12? [PC J.1.(d)(ii)] — Yes _X_ No ❑ N/A ___RMK#___

   c. Class 1 explosives, as defined in 49 CFR 173.50(b)(1) and (2)? [PC J.1.(d)(iii)] — Yes _X_ No ❑ N/A ___RMK#___

   d. Shock sensitive wastes? [PC J.1.(d)(iv)] — Yes _X_ No ❑ N/A ___RMK#___

   e. Polychlorinated biphenyls regulated by the TSCA (GT/ET 50 ppm)? [PC J.1.(d)(v)] — Yes _X_ No ❑ N/A ___RMK#___

   f. Radioactive waste regulated by the Nuclear Regulatory Commission? [PC J.1.(d)(vi)] — Yes _X_ No ❑ N/A ___RMK#___

   g. Infectious wastes? [PC J.1.(d)(vii)] — Yes _X_ No ❑ N/A ___RMK#___

   h. Any waste in gaseous form? [PC J.1.(d)(viii)] — Yes _X_ No ❑ N/A ___RMK#___

   i. Any waste that is capable under standard temperature and pressure, of causing fire through friction, absorption of moisture of spontaneous chemical changes, and, when ignited, burn so vigorously and persistently that it creates a hazard, as specified in OAC Rules 3745-51-21(B) and 3745-57-12(A)? [PC J.1.(d)(ix)] — Yes _X_ No ❑ N/A ___RMK#___

j. Any lab pack container that is found to either be incorrectly packaged, incorrectly sealed, leaking or that does not otherwise meet the requirements specified in OAC Rule 3745-57-16? [PC J.1.(d)(x)] Yes _X_ No ❑ N/A ___RMK#___

k. Any ignitable, reactive, or incompatible wastes unless these wastes are containerized and physically separated by inert materials to protect them from conditions that may cause them to ignite or react? [PC J.1.(d)(xi)] Yes _X_ No ❑ N/A ___RMK#___

l. Wastes that will, at the concentration accepted:

i. Adversely affect the permeability of the clay liner(s)? [PC J.1.(d)(xii)(a)] Yes _X_ No ❑ N/A ___RMK#___

ii. Produce leachate that is incompatible with the synthetic liner(s) and leachate collection system piping? [PC J.1.(d)(xii)(b)] Yes _X_ No ❑ N/A ___RMK#___

iii. Generate gases that adversely affect the permeability of the clay cap? [PC J.1.(d)(xii)(c)] Yes _X_ No ❑ N/A ___RMK#___

m. Any waste exhibiting a flashpoint below 100° F as detailed in Sections C-2(f)(11) through C-2(f)(13) of the permit application? [PC J.1.(d)(xiii)] Yes _X_ No ❑ N/A ___RMK#___

n. Any waste that will not achieve a minimum shear strength of 2000 pounds per square foot in accordance with PC J.2.(s)? [PC J.1.(d)(xiv)] Yes _X_ No ❑ N/A ___RMK#___

6. Does the Permittee comply with all Land Disposal Restrictions as specified in OAC Chapter 3745-270? Yes _X_ No ❑ N/A ___RMK#___

LANDFILL DESIGN AND INSTALLATION

7. Did the Permittee construct Cell M in accordance with the plans and drawings contained in the approved application, terms and conditions of the permit and Ohio's hazardous waste rules? [PC J.2.(a)] Yes _X_ No ❑ N/A ___RMK#___

NOTE: ***Any design or construction plans for the Cell must be approved by Ohio EPA. [PC J.2.(a)]***

8. Do earthfills, where used, consist of well-graded soil mixture? [PC J.2.(b)] Yes _X_ No ❑ N/A ___RMK#___

a. Is earthfill material free of debris, plant materials, rock fragments greater than 6-inches in maximum dimension, large clods, frozen material, or other foreign materials? [PC J.2.(b)] Yes _X_ No ❑ N/A ___RMK#___

b. Have in-situ field density tests been used to verify the desired degree of compaction? [PC J.2.(b)] Yes _X_ No ❑ N/A ___RMK#____

c. Has all construction utilizing earthfill material been conducted in accordance with Appendix D.6 of the approved application? [PC J.2.(b)] Yes _X_ No ❑ N/A ___RMK#____

d. Has all earthfill material used been brought to proper water content? [PC J.2.(b)] Yes _X_ No ❑ N/A ___RMK#____

9. Has the Permittee required leak testing and certification of the entire length of each seam in each synthetic liner, including caps, sump welds and connections, by vacuum box, unless an equivalent, or more rigorous test method is used? [PC J.2.(c)] Yes _X_ No ❑ N/A ___RMK#____

10. For each day of synthetic liner seaming operations, does the Permittee subject at least 1 of the 3 trial seam samples to tensiometer testing for tensile strength and peel strength prior to making field seams during that day? [PC J.2.(d)] Yes _X_ No ❑ N/A ___RMK#____

a. Does the Permittee conduct the testing referenced in Question #10 on a random field seam sample each day of liner seaming operation? [PC J.2.(d)] Yes _X_ No ❑ N/A ___RMK#____

b. If the above testing has revealed that samples have failed destructive shear and/or peel tests, then has the Permittee required the liner installer to cap or otherwise repair the seams? [PC J.2.(e)] Yes _X_ No ❑ N/A ___RMK#____

11. Has the outer perimeter of all liners and liner systems been well protected and well marked through all stages of landfill cell construction, partial closure, and final closure? [PC J.2.(f)] Yes _X_ No ❑ N/A ___RMK#____

12. Does the cap for Cell M consist of a 4-foot thick uppermost soil layer composed of a 6-inch layer of soil that supports vegetation, and a 42-inch layer of cover soil, underlain consecutively by a geotextile fabric, a synthetic drainage net, a 40-mil HDPE membrane line, a 2-foot layer of re-compacted clay, and geotextile fabric at the top between the perimeter clay dikes? [PC J.2.(g)] Yes _X_ No ❑ N/A ___RMK#_43__

13. After the placement of the 2-foot re-compacted clay liner, and prior to the placement of the remainder of the cap, did the Permittee submit certification to Ohio EPA that the re-compacted clay liner has not been exposed to freeze/thaw conditions and/or any other weather conditions that have impaired its desired permeability? [PC J.2.(g)] Yes _X_ No ❑ N/A ___RMK#_43__

14. Has any component of the landfill system or construction techniques to perform as required failed since the last CEI? If so: Yes ❑ No _X_ N/A ___RMK#____

a. Did the Permittee notify Ohio EPA, in writing, as soon as practicable, or within 7 days, whichever is less? [PC J.2.(h)] Yes ___ No ❑ N/A _X_ RMK#____

15. During the construction phase of Cell M, did the Permittee excavate to the top of the lower till? [PC J.2.(i)] Yes _X_ No ❑ N/A ___ RMK#____

16. Have all materials located at the contact of the upper and lower tills, including sands, been completely removed over the entire base of Cell M? [PC J.2.(i)] Yes _X_ No ❑ N/A ___ RMK#____

17. Does the Permittee maintain the lowest point of the 3-foot re-compacted clay secondary liner, including any portion of the secondary clay liner below the leachate collection sumps, no less than 6-feet above the top of the lower till? [PC J.2.(k)] Yes _X_ No ❑ N/A ___ RMK#____

NOTE: ***This installation shall ensure a minimum of 9 feet of re-compacted clay at the base of Cell M when measured from the top of the lower till. [PC J.2.(k)]***

18. Do all below grade slopes of Cell M have a minimum of 3.5 feet of re-compacted clay installed between the in-situ materials and the outermost portion of the 3-foot re-compacted clay secondary liner (measured perpendicularly from the sidewall)? [PC J.2.(l)] Yes _X_ No ❑ N/A ___ RMK#____

NOTE: ***This installation shall ensure a minimum of 6.5 feet of re-compacted clay on all Cell M side slopes measured perpendicularly from the sidewall. [PC J.2.(l)]***

19. Do the constructed side slopes extend from the ground surface to the top of the lower till, and are they effectively attached, or otherwise "keyed" into both the clay liner base and the lower till? [PC J.2.(l)] Yes_X_ No ❑ N/A ___ RMK#____

20. In the areas of phase 3 where a 10% slope area has been designated, is the side slope extended to the 10% slope area and effectively attached, or otherwise "keyed" into the 10% slope area? [PC J.2.(l)] Yes _X_ No ❑ N/A ___ RMK#____

21. Does the 10% slope area of Phase 3 have a minimum of 3.5 feet of re-compacted clay installed between the in-situ materials and the outermost portion of the 3-foot re-compacted clay secondary liner (measured perpendicularly from the slope)? [PC J.2.(m)] Yes _X_ No ❑ N/A ___ RMK#____

NOTE: ***This installation shall ensure a minimum of 6.5 feet of re-compacted clay for the 10% slope area measured perpendicularly from the slope. [PC J.2.(m)]***

22. Does the 10% slope area include a 12-inch granular layer and a geonet for the primary leachate collection and a structurally enhanced tri-planar geonet installed as a secondary collection system? [PC J.2.(m)] Yes _X_ No ❑ N/A ___ RMK#____

23. Do the final cover (cap) and bottom clay liners for Cell M have permeabilities no greater than that of the in-situ upper till (represented as 3.6 X 10^{-8} cm/sec as determined using the slug tests in upper till and utilizing the Bouwer and Rice method)? [PC J.2.(n)] Yes _X_ No ❑ N/A ___RMK#___

24. Does the above-grade design and construction of Cell M meet the specifications of PC J.2.(o)? Yes _X_ No ❑ N/A ___RMK#___

25. Has the Permittee maintained the leak detection/collection system and primary leachate collection and removal systems in accordance with the plans contained in the permit application, Ohio hazardous waste rules, and the terms and conditions of the permit? [PC J.2.(p)] Yes _X_ No ❑ N/A ___RMK#___

26. For each phase of landfill construction, has the Permittee had an independent, qualified, registered P.E. monitor and examine the construction and certify, in accordance with OAC Rule 3745-50-42(D)(1), that the construction has occurred in accordance with the permit application and the terms and conditions of the permit? [PC J.2.(q)] Yes _X_ No ❑ N/A ___RMK#___

a. Has the engineer been selected and paid for by the Permittee and approved by Ohio EPA? [PC J.2.(q)] Yes _X_ No ❑ N/A ___RMK#___

27. Did the Permittee submit revised plan drawings, cross-sections and related details in accordance with the February 10, 2005 revised slope stability calculations, within 30 days of the effective date of this permit and prior to beginning construction activities related to the vertical expansion modification? [PC J.2.(r)] Yes _X_ No ❑ N/A ___RMK#___

NOTE: ***The revised drawings and design specifications must be consistent with the slope factor of safety requirements specified in Permit Condition J.2.(o)(iv). [PC J.2.(r)]***

28. Did the Permittee submit revised application pages for all other sections of the vertical expansion modification that were affected by the February 10, 2005 submission? [PC J.2.(r)] Yes _X_ No ❑ N/A ___RMK#___

NOTE: ***The information required by PC J.2.(r) must be submitted as a Class 1 permit modification requiring director approval (Class 1A) in accordance with OAC Rule 3745-50-51. [PC J.2.(r)]***

29. Has the Permittee verified that the required minimal waste in-situ shear strength of 2000 pounds per square foot is being maintained, by conducting the following tests:

a. Obtain at least one undisturbed sample of waste material following its disposal and compaction (if any), and following the procedures specified below: Yes _X_ No ❑ N/A ___RMK#___

i. Notify Ohio EPA on-site staff at least 3 days prior to the sampling event? Yes _X_ No ❑ N/A ___RMK#___

ii. Representative sample taken within the placed lift following applicable ASTM D-1587, "Practice for Thin-walled Tube Sampling of Soils for Geotechnical Purposes" requirements? Yes _X_ No ❑ N/A ___RMK#___

iii. Sample was transported following the standards outlined in ASTM D-4220, "Practices for Preserving and Transporting Soil Samples"? Yes _X_ No ❑ N/A ___RMK#___

iv. Sample was allowed to cure for a minimum of one week but not more than 4 weeks? Yes _X_ No ❑ N/A ___RMK#___

v. Sample was tested at an independent lab or by the Permittee in accordance with ASTM D-2166-00? Yes _X_ No ❑ N/A ___RMK#___

vi. A report titled, "Cell M - In-situ Waste Shear Strength Testing Report" was submitted to Ohio EPA once every 6 months from the effective date of the permit and within 15 days from the last day of the respective 6-month sampling period? Yes _X_ No ❑ N/A ___RMK#___

vii. The above report included the name(s) of the person(s) who performed the sampling, location, sampling depth, equipment used, date of sampling, sampled waste designation, complete sample description and laboratory test results? Yes _X_ No ❑ N/A ___RMK#___

b. Is the reported shear strength less than 2000 psf during any month? If yes, then: Yes ___ No _X_ N/A ___RMK#___

i. Were three core samples taken from the same slab within 60 days of the original sampling date? Yes ___ No ❑ N/A _X_ RMK#___

ii. If the median shear strength of the three additional samples is below 2000 psf, was waste disposal discontinued in this area and a report submitted within 90 days from the original sample date detailing measures to be taken to return to compliance with the 2000 psf requirement? Yes ___ No ❑ N/A _X_ RMK#___

c. Have 12 consecutive tests shown that the 2000 psf shear strength requirement has been met? If yes, then: Yes _X_ No___ N/A ___RMK#_44_

i. Was testing completed every 2 months? Yes _X_ No ❑ N/A ___RMK#____

d. Was a Class 1 permit modification submitted within 90 days of permit issuance to revise applicable portions of the application? Yes _X_ No ❑ N/A ___RMK#____

30. Did the sampling specified above begin within two (2) weeks from the effective date (September 15, 2005) of this permit: Yes ___ No ❑ N/A _X_RMK#___

CONTAINMENT AND DETECTION OF RELEASES

31. Does the Permittee monitor, operate, and maintain the primary leachate collection system and secondary leachate collection system of Cell M? [PC J.3.(a)] Yes _X_ No ❑ N/A ___RMK#____

32. Does the Permittee ensure that leachate accumulation on the primary synthetic liner, excluding the sumps, not exceed the height of one foot, except for temporary excursions in Cell M following a precipitation event? [PC J.3.(a)] Yes _x_ No ❑ N/A ___RMK# 45

33. Does the Permittee activate primary system pumps whenever the leachate levels on the liner exceed 10 inches, to minimize potential excursions? [PC J.3.(a)] Yes_X_ No ❑ N/A ___RMK# 45

34. Does the Permittee return the leachate levels to less than 10 inches after a precipitation event that triggered a temporary excursion by operating the landfill collection sumps 24 hours per day, 7 days per week? [PC J.3.(a)] Yes _X_ No ❑ N/A ___RMK# 45

35. Does the Permittee monitor the quality of leachate pumped from the primary leachate collection system of each cell in accordance with Permit Condition J.7.(e)? [PC J.3.(b)] Yes _X_ No ❑ N/A ___RMK#____

36. For Cell M sub-cells where SLCS monitoring equipment cannot be installed due to space constraints, does the Permittee monitor for the presence of liquid Semiweekly (Sunday through Saturday)? [PC J.3.(c)] Yes _X_ No ❑ N/A ___RMK#____

a. If activation of the pump produces no liquids, then did the Permittee verify that the pump was operable before concluding that no liquid was present in the sub-cell sump? [PC J.3.(c)] Yes _X_ No ❑ N/A ___RMK#____

i. If the pump was found to be inoperable, then did the Permittee repair or replace as appropriate to restore pumping capability? [PC J.3.(c)] Yes ___ No ❑ N/A _X_RMK#____

LANDFILL OPERATING REQUIREMENTS

37. Does the Permittee conduct landfill operations according to the approved practices and procedures set forth in Section D of the permit application and terms and conditions of the permit? [PC J.4.] — Yes _X_ No ❑ N/A ___ RMK#___

38. Are trucks carrying wastes into the cell swept or brushed to remove all visible particles of waste from tires and exterior of the bed prior to leaving the facility? [PC J.4.(a)] — Yes ___ No _X_ N/A ___ RMK# _31_

39. Are truck tires and frames decontaminated when coming into contact with hazardous waste? [PC J.4.(a)] — Yes _X_ No ❑ N/A ___ RMK#___

40. Is unloading of wastes into the landfill cell halted whenever wind speed is high enough to blow wastes out of the cell? [PC J.4.(b)] — Yes _X_ No ❑ N/A ___ RMK#___

41. During periods of high winds, does the Permittee take mitigative steps to minimize wind dispersal? [PC J.4.(b)] — Yes _X_ No ❑ N/A ___ RMK#___

42. Does the Permittee conduct treatment within Cell M in accordance with the procedures outlined in Section D-4 and D-5 of the permit application? [PC J.4.(c)] — Yes _X_ No ❑ N/A ___ RMK#___

43. Does the Permittee prohibit the treatment of waste in the cell when there is a potential to generate fugitive dusts that could migrate beyond the landfill perimeter? [PC J.4.(c)] — Yes _X_ No ❑ N/A ___ RMK#___

44. Does the Permittee monitor the temperature of incoming bulk loads? [PC J.4.(d)]. — Yes _X_ No ❑ N/A ___ RMK#___

    a. If the temperature is found to be greater than 20° F below the waste's flashpoint, then does the Permittee either reject the load or wait for disposal until the temperature reaches the desired range? [PC J.4.(d)] — Yes ___ No ❑ N/A _X_ RMK#___

INSPECTION SCHEDULES AND PROCEDURES

45. Has the Permittee inspected Cell M in accordance with the Inspection schedule found in Section F of the permit application and completed the following items as part of the inspections? — Yes _X_ No ❑ N/A ___ RMK#___

    a. Inspect during construction of landfill components including subsoil foundations, clay and synthetic cover and liners, leachate collection and leachate detection system in accordance with OAC Rule 3745-54-15, 3745-54-31, 3745-57-01, quality assurance and the inspection plans contained in the permit application and the terms and conditions of the permit? [PC J.5.(b)] — Yes _X_ No ❑ N/A ___ RMK#___

b. Inspect the following components weekly or after storm events (2" or more in 8 hours):

i. Deterioration, malfunction, or improper operation of run-on and run-off control system? Yes _X_ No ❑ N/A ___RMK#___

ii. Proper functioning of wind dispersal control system? Yes _X_ No ❑ N/A ___RMK#___

iii. The presence of leachate in and proper functioning of leachate collection and removal systems? Yes _X_ No ❑ N/A ___RMK#___

46. Does the Permittee document compliance with PC J.5. in the operating record? [PC J.5.(d)] Yes _X_ No ❑ N/A ___RMK#___

47. Does the Permittee record the amount of liquids removed from each leachate detection sump at least once a week during the active life of the landfill? [PC J.5.(e)] Yes _X_ No ❑ N/A ___RMK#___

48. Does the Permittee record the amount of liquids removed from each leachate detection sump at least monthly after final cover (cap) is constructed? [PC J.5.(e)] Yes _X_ No ❑ N/A ___RMK#___

NOTE: ***Additional conditions of reporting requirements listed in OAC 3745-57-05(C)(2) are incorporated by reference.***

RESPONSE TO RELEASES

49. Does the Permittee follow the RAP found in Volume 9, Appendix D.32 of the permit application, which contains procedures for detection, mitigating, notifying, and reporting leakage into the leak detection system present between the synthetic liners? [PC J.6.(a)] Yes _X_ No ❑ N/A ___RMK#___

50. Has the Permittee notified the director in accordance with the RAP and expeditiously repaired the damage to the liner system upon leakage or an imminent hazard of leakage? [PC J.6.(b)] Yes ___ No ❑ N/A _X_ RMK# _46_

51. Has the Permittee notified the Ohio EPA on-site inspector and expeditiously repaired the damage upon discovery of a tear or puncture in the liner system? [PC J.6.(b)] Yes ___ No ❑ N/A _X_ RMK#___

52. Did the Permittee complete and file a certified "Liner System Repair Report" and "Certification of Liner System Report" into the operating record within 7 days after completion of the repairs noted in questions 50 and 51 above? [PC J.6.(b)] Yes ___ No ❑ N/A _X_ RMK#___

53. If the Permittee cannot implement the RAP while the cell or sub-cell is active, was waste disposal activity in this cell or sub-cell ceased? Yes ___ No ❑ N/A_X_ RMK#___

RECORDKEEPING AND REPORTING

54. In accordance with OAC Rule 3745-57-09, does the Permittee maintain the following information in the facility's operating record:

a. A map that shows the location and dimensions of each landfill cell, including the depth of each cell with respect to permanently surveyed benchmarks? [PC J.7.(a)(i)] — Yes _X_ No ❑ N/A ___ RMK#___

b. The contents of each landfill area, and each waste's approximate location within the landfill? [PC J.7.(a)(ii)] — Yes _X_ No ❑ N/A ___ RMK#___

c. The waste's identification cross referenced to the manifest document number? [PC J.7.(a)(iii)] — Yes _X_ No ❑ N/A ___ RMK#___

55. For each operating day, does the Permittee record in the facility's operating record the following:

a. Measurement of wind direction? [PC J.7.(b)(i)] — Yes _X_ No ❑ N/A ___ RMK#___

b. Average and maximum wind speed? [PC J.7.(b)(ii)] — Yes _X_ No ❑ N/A ___ RMK#___

c. Precipitation accumulated over the previous 24-hour period? [PC J.7.(b)(iii)] — Yes _X_ No ❑ N/A ___ RMK#___

56. Does the Permittee record leachate level readings in the Cell M sub-cells prior to the manual removal of leachate and after completion of leachate removal activities at the end of the working day? [PC J.7.(c)] — Yes _X_ No ❑ N/A ___ RMK#___

57. For leachate level readings used to determine compliance with PC J.3.(a)(i), does the Permittee take and record the leachate level readings at the end of the working day? [PC J.7.(c)] — Yes _X_ No ❑ N/A ___ RMK#___

58. Does the Permittee report to Ohio EPA on a monthly basis, the following information related to the PLCS and SLCS of Cell M:

a. Daily on-site rainfall measurements? [PC J.7.(d)(i)] — Yes _X_ No ❑ N/A ___ RMK#___

b. As applicable, any daily operational problems associated with the systems (e.g., pumps inoperable, transducers inoperable, etc.)? [PC J.7.(d)(ii)] — Yes _X_ No ❑ N/A ___ RMK#___

c. Daily leachate level readings before and after any leachate removal from the systems? [PC J.7.(d)(iii)] — Yes _X_ No ❑ N/A ___ RMK#___

d. Daily volumes of leachate removed from the systems? [PC J.7.(d)(iv)] — Yes _X_ No ❑ N/A ___RMK#___

59. Has the Permittee provided to Ohio EPA analytical results of leachate from each sub-cell annually for the parameters listed in Table K-1, K-2, and K-3 of this permit? [PC J.7.(e)] — Yes _X_ No ❑ N/A ___RMK#___

CLOSURE AND POST-CLOSURE CARE

60. Did the Permittee follow the procedures in the closure plan in Section I of the permit application at closure of the landfill? [PC J.8.(a)] — Yes ___ No ❑ N/A _X_ RMK# _43_

61. Did the Permittee comply with all post-closure requirements in OAC Rule 3745-55-17, 3745-55-20, and Section I of the permit application after final closure? [PC J.8.(b)] — Yes ___ No ❑ N/A _X_ RMK# _43_

62. Did the Permittee provide maps, charts, and other required records to the director and the local land authorities as required by OAC Rule 3745-55-19(B)(1)(c) after final closure? [PC J.8.(b)] — Yes ___ No ❑ N/A _X_ RMK# _43_

IGNITABLE OR REACTIVE WASTES

63. Has the Permittee placed ignitable or reactive waste in the landfill? If yes, then is one of the following achieved: — Yes ___No_X_N/A ___RMK#___

a. Are the procedures in the permit application followed? [PC J.9.] — Yes ___ No ❑ N/A _X_ RMK#___

b. Does the waste and landfill meet all applicable requirements of OAC Chapter 3745-270? [PC J.9.] — Yes ___ No ❑ N/A _X_ RMK#___

c. Is compliance with OAC Rule 3745-54-17(B) achieved? [PC J.9.] — Yes ___ No ❑ N/A_X_ RMK#___

INCOMPATIBLE WASTES

64. Has the Permittee placed incompatible wastes and/or materials in the same landfill when procedures specified in the permit application and OAC Rule 3745-54-17(B) are not followed? [PC J.10.] — Yes ❑ No_X_N/A ___RMK#___

SPECIAL CONTAINER REQUIREMENTS

65. Does the Permittee meet the requirements of OAC Rule 3745-57-15 and Section D of the permit application prior to the placement of containers of hazardous waste in the landfill? [PC J.11.] And meet the following requirements prior to placement in the landfill: — Yes _X_ No ❑ N/A ___RMK#___

a. Are containers 90 percent or greater full? Yes _X_ No ❑ N/A ___RMK#___

NOTE: ***For containers less than 90 percent full, the Permittee must either crush the container, or add other material so that the container is at least 90 percent full prior to landfill disposal. [PC J.11.(b)]***

b. Are containers absent of free liquids? If No, then: Yes _X_No___N/A ___RMK#___

i. Is the container very small, such as an ampule, Yes ___ No ❑ N/A _X_RMK#___

ii. Is the container designed to hold free liquids for use other than storage, such as a battery or capacitor, Or Yes ___ No ❑ N/A _X_RMK#___

iii. Is the container a lab pack as defined in OAC Rule 3745-57-16? Yes ___ No ❑ N/A _X_RMK#___

66. Does the Permittee cover and enclose containers placed in the landfill with compatible bulk wastes, stabilized material, or intermediate cover? [PC J.11.(c)] Yes _X_ No ❑ N/A ___RMK#___

NOTE: ***This material must be placed to fill void spaces between the containers. [PC J.11.(c)]***

67. Does the Permittee meet the requirements of OAC Rule 3745-57-16 and Section D of the permit application prior to the placement of small containers of hazardous waste in overpacked drums (lab packs) in the landfill? Yes _X_ No ❑ N/A ___RMK#___

REQUIREMENTS FOR F020, F021, F022, F023, F026, AND F027

68. Does the Permittee operate the landfill in accordance with a management plan that is approved by the director pursuant to OAC Rule 3745-57-18 and other applicable requirements of OAC Chapter 3745-57 prior to placing any F020, F021, F022, F023, F026, and F027 wastes in the landfill? [PC J.13.] Yes ___ No ❑ N/A _X_ RMK#_47_

MODULE L – ADDITIONAL PERMIT CONDITIONS

1. Does the Permittee maintain a document depository at a public library located in the City of Oregon, that consists of all consequential documents and correspondence between the Permittee and Ohio EPA under the terms and conditions of this permit subject to the requirements of PC A.13. or germane to such documents? [PC L.1.] — Yes _X_ No ❑ N/A ___ RMK#___

2. Was permission denied to maintain such a document by the library or did the terms required for such a depository become unreasonable? If yes, then: — Yes ___ No _X_ N/A ___ RMK#___

   a. Did the Permittee inform Ohio EPA and document such denial and/or circumstances? [PC L.1.] — Yes ___ No ❑ N/A _X_ RMK#___

3. Did the Permittee have available a sufficient supply of water at a nozzle pressure of 100 PSI for use with the fire suppression system, prior to managing hazardous waste in any area of the modified portions of the facility? [PC L.2.] — Yes _X_ No ❑ N/A ___ RMK#___

4. Does the Permittee follow the surface water management plan for the entire facility as found in Volume 6, Appendix D.24 of the permit application? [PC L.3.] — Yes _X_ No ❑ N/A ___ RMK# _43_

5. Have all other wells or borings that have been installed at the facility that are not addressed in Modules K or E been operated and maintained to perform to design specifications? [PC L.4.] — Yes ___ No ❑ N/A _X_ RMK#___

   a. When the above wells or borings are abandoned, are they plugged and abandoned in accordance with the *State of Ohio Technical Guidance for Sealing Unused Wells* (State Coordinating Committee on Ground Water, 1996) and *Ohio EPA's Technical Guidance Manual for Hydrogeologic Investigations and Ground Water Monitoring (1995)*? [PC L.4.] — Yes ___ No ❑ N/A _X_ RMK#___

6. Have well plugging and abandonment methods, and certification been submitted to the director within 30 days from the date the wells were abandoned? — Yes ___ No ❑ N/A _X_ RMK#___

END OF PERMIT CONDITIONS

LARGE QUANTITY GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] — Yes _X_ No ___ N/A ___ RMK# ___

2. Has the generator obtained a U.S. EPA identification number? [3745-52-12] — Yes _X_ No ❑ N/A ___RMK#___

3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41] — Yes _X_ No ❑ N/A ___RMK#___

WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? If so: — Yes ___No_X_N/A ___RMK#___

   a. Has the generator notified U.S. EPA of export/import activity? [3745-52-53] — Yes ___ No ❑ N/A _X_RMK#___

   b. Has the generator complied with special manifest requirements? [3745-52-54] — Yes ___ No ❑ N/A _X_RMK#___

   c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] — Yes ___ No ❑ N/A _X_RMK#___

   d. Has an annual report been submitted to U.S. EPA? [3745-52-56] — Yes ___ No ❑ N/A _X_RMK#___

   e. Are export related documents being maintained on-site? [3745-52-57] — Yes ___ No ❑ N/A _X_RMK#___

GENERATOR CLOSURE REQUIREMENTS

5. Has the generator closed any <90-day accumulation unit(s) since the date of the last inspection? If so: — Yes ___No_X_N/A ___RMK#___

   a. Describe the unit(s) which the generator has closed. — Yes ___ No ❑ N/A _X_RMK#___

   b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] — Yes ___ No ❑ N/A _X_RMK#___

   c. Please provide a description of the documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standards. — Yes ___ No ❑ N/A _X_RMK#___

NOTE: ***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]***

MANIFEST REQUIREMENTS

You must start this part of the inspection by telling the company representative about the certification statement on the hazardous waste manifest using the following question and statement:

Are you aware of what the statement that you sign on the manifest says? Yes_X_ No___

If the answer is no, show them what the statement says using a signed manifest.

NOTE: ***While the statement is a certification that a P2 strategy is in place, signing the statement does not establish any legal obligations with which the company must comply. In other words, there is no violation of the hazardous waste rules if they sign the manifest and they don't have a program in place.***

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

7. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] — Yes _X_ No ___ N/A ___ RMK# ___

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)]***

8. Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)] — Yes _X_ No ❑ N/A ___RMK#___

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)]***.

9. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: — Yes ___ No _X_ N/A ___ RMK# ___

   a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] — Yes ___ No ❑ N/A _X_ RMK# ___

10. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)] — Yes _X_ No ❑ N/A ___RMK#___

11. Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not: — Yes _X_ No ❑ N/A ___RMK#___

   a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] — Yes ___ No ❑ N/A _X_ RMK#___

   b. If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] — Yes ___ No ❑ N/A _X_ RMK#___

12. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes _X_ No ❑ N/A ___RMK#___

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

13. Does the generator keep records required by 3745-65-16(D) including:

a. Job titles, as they relate to hazardous waste management, and the name of each employee filling each job? Yes _X_ No ❑ N/A ___RMK#___

b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position? Yes _X_ No ❑ N/A ___RMK#___

c. Type and amount of both introductory and continuing training to be given to each person filling a position? Yes _X_ No ❑ N/A ___RMK#___

d. Documentation that personnel have completed the training or job experience required under 3745-65-16 (A)(B) & (C)? Yes _X_ No ❑ N/A ___RMK#___

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

14. 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 _X_ No ❑ N/A ___RMK#___

15. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]

a. Emergency procedures? Yes _X_ No ❑ N/A ___RMK#___

b. Emergency equipment? Yes _X_ No ❑ N/A ___RMK#___

c. Emergency systems? Yes _X_ No ❑ N/A ___RMK#___

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

a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? Yes _X_ No ❑ N/A ___ RMK#___

b. Key parameters for automatic waste feed cut-off systems? Yes _X_ No ❑ N/A ___ RMK#___

c. Communication or alarm system? Yes _X_ No ❑ N/A ___ RMK#___

d. Response procedures for fire/explosions? Yes _X_ No ❑ N/A ___ RMK#___

e. Response to groundwater contamination incidents? Yes _X_ No ❑ N/A ___ RMK#___

f. Shutdown procedures? Yes _X_ No ❑ N/A ___ RMK#___

17. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes _X_ No ❑ N/A ___ RMK#___

18. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes _X_ No ❑ N/A ___ RMK#___

19. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes _X_ No ❑ N/A ___ RMK#___

20. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)] Yes _X_ No ❑ N/A ___ RMK#___

21. 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 _X_ No ❑ N/A ___ RMK#___

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

Job Performed	**Name of Employee**	**Date(s)Trained**

CONTINGENCY PLAN

23. Does the generator have a contingency plan which describes the following: [3745-65-52(A) through (F)]

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

b. Arrangements with emergency authorities? [3745-65-37] Yes _X_ No ❑ N/A ___ RMK#___

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

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

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

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

24. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes _X_ No ❑ N/A ___ RMK#___

25. 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 _X_ No ❑ N/A ___ RMK#___

26. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure of the plan or as required by the Director? [3745-65-54] Yes _X_ No ❑ N/A ___ RMK#___

EMERGENCY COORDINATOR

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

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***

28. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes _X_ No ___ N/A ___ RMK# _3_

a. Was the contingency plan implemented? [3745-65-51(B)] Yes _X_ No ❑ N/A ___ RMK#___

b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes _X_ No ❑ N/A ___ RMK#___

c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes _X_ No ❑ N/A ___ RMK# 3

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

29. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes _X_ No ❑ N/A ___RMK#___

30. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]

a. Internal alarm system? Yes _X_ No ❑ N/A ___RMK#___

b. Emergency communication device? Yes _X_ No ❑ N/A ___RMK#___

c. Portable fire control, spill control and decon equipment? Yes _X_ No ❑ N/A ___RMK#___

d. Water of adequate volume/pressure? Yes _X_ No ❑ N/A ___RMK#___

31. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] Yes _X_ No ❑ N/A ___RMK#___

32. Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33] Yes _X_ No ❑ N/A ___RMK#___

33. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32)*? [3745-65-34] Yes _X_ No ❑ N/A ___RMK#___

34. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes _X_ No ❑ N/A ___RMK#___

35. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes _X_ No ❑ N/A ___RMK#___

a. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] Yes ___ No ❑ N/A _X_ RMK#___

GENERATOR ACCUMULATION

36. Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)] — Yes ❑ No_X_ N/A ___ RMK#___

37. Is the facility a metal finisher that generates waste water treatment sludge with a F006 waste code? If yes: — Yes ___ No_X_ N/A ___ RMK#___

NOTE: If yes, they may accumulate F006 waste on-site for up to 180 days; or up to 270 days if they must transport the F006 waste over 200 miles for off-site metals recovery; without an Ohio hazardous waste permit, provided that they meet these special conditions (OAC 3745-52-34(G) and (H)):

a. The generator has implemented pollution prevention practices that reduce the amount of any hazardous substances, pollutants or contaminants entering F006 or otherwise released to the environment prior to its recycling (see your P2 coordinator for a copy of Federal Register 3/00 for a listing of examples of P2 measures, the facility should be prepared to demonstrate this request); — Yes ___ No ❑ N/A _X_ RMK#___

b. The F006 waste is legitimately recycled through metals recovery. — Yes ___ No ❑ N/A _X_ RMK#___

c. No more than 20,000 kg. of F006 is accumulated on-site at any one time. — Yes ___ No ❑ N/A _X_ RMK#___

d. The facility complies with the applicable management standards for containers, tanks or containment buildings for LQGs. — Yes ___ No ❑ N/A _X_ RMK#___

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

38. Does the generator ensure that satellite accumulation area(s):

a. Are at or near a point of generation? — Yes _X_ No ❑ N/A ___ RMK#___

b. Are under the control of the operator of the process generating the waste? — Yes _X_ No ❑ N/A ___ RMK#___

c. Do not exceed a total of 55 gallons of hazardous waste? — Yes _X_ No ❑ N/A ___ RMK#___

d Do not exceed one quart of acutely hazardous waste at any one time? — Yes _X_ No ❑ N/A ___ RMK#___

e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? — Yes _X_ No ❑ N/A ___ RMK#___

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. The inspector should refer to Guidance Document #DHWM-008, Satellite Accumulation Under Ohio Hazardous Waste Rules.***

39. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 38(c) or 38(d)? If so: — Yes ___ No _X_ N/A ___ RMK#___

    a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? — Yes ___ No ❑ N/A _X_ RMK#___

    b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? — Yes ___ No ❑ N/A _X_ RMK#___

USE AND MANAGEMENT OF CONTAINERS

40. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] — Yes _X_ No ❑ N/A ___ RMK#___

41. Is the accumulation date on each container? [3745-52-34(A)(2)] — Yes _X_ No ❑ N/A ___ RMK#___

42. Are hazardous wastes stored in containers which are:

    a. Closed (except when adding/removing wastes)? [3745-66-73(A)] — Yes _X_ No ❑ N/A ___ RMK#___

    b. In good condition? [3745-66-71] — Yes _X_ No ❑ N/A ___ RMK#___

    c. Compatible with wastes stored in them? [3745-66-72] — Yes _X_ No ❑ N/A ___ RMK#___

    d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] — Yes _X_ No ❑ N/A ___ RMK#___

43. Is the container accumulation area(s) inspected weekly? [3745-66-74] (*Note location in general information section of checklist)* — Yes _X_ No ❑ N/A ___ RMK#___

    a. Are inspections recorded in a log or summary? [3745-66-74] — Yes ___ No ❑ N/A _X_ RMK#___

44. For ignitable and/or reactive hazardous waste(s):

    a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] — Yes ___ No ❑ N/A _X_ RMK# 28

    b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] — Yes ___ No ❑ N/A _X_ RMK# 28

PRE-TRANSPORT REQUIREMENTS

45. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] — Yes _X_ No ❑ N/A ___RMK#___

46. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] — Yes ___ No ❑ N/A _X_ RMK# _48_

47. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] — Yes _X_ No ❑ N/A ___RMK#___

LDR CHECKLIST

GENERAL LDR REQUIREMENTS

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

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

   b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes _X_ No ❑ N/A ___RMK#___

2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] Yes _X_ No ❑ N/A ___RMK#___

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

4. Does the generator generate a characteristic hazardous waste? If so: Yes _X_ No___ N/A ___RMK#___

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

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

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

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

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

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

NOTE: ***Wastes with EPA hazardous waste numbers K174 and K175 (chlorinated aliphatic wastes) have specific requirements in Rule 3745-270-33. Waste with EPA hazardous waste numbers K176, K177 and K178 (inorganic chemical wastes) have specific requirements in Rule 3745-270-36.***

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

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

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] — Yes ❑ No_X_ N/A ___ RMK#___

NOTE: ***In other words, is combustion a legitimate treatment method.***

9. Has the generator added iron filings to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] — Yes ❑ No_X_ N/A ___ RMK#___

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste? [3745-270-05] If so: — Yes ___ No_X_ N/A ___ RMK#___

    a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment. [3745-270-05] — Yes ___ No ❑ N/A _X_ RMK#___

11. Does the facility have an extension to allow for a restricted waste to be land disposed? [3745-270-06] If so: — Yes ___ No_X_ N/A ___ RMK#___

    a. The facility can land dispose of the waste. [3745-270-06] — Yes ___ No ❑ N/A _X_ RMK#___

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? If so: — Yes ___ No_X_ N/A ___ RMK#___

    a. Has the facility complied with 3745-270-04? — Yes ___ No ❑ N/A _X_ RMK#___

NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)] — Yes_X_ No ❑ N/A ___ RMK#___

14. If a generator's waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)] — Yes ___ No ❑ N/A _X_ RMK#___

15. If a generator's waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)] Yes ___ No ❑ N/A _X_ RMK#___

16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)] Yes ___ No ❑ N/A _X_ RMK#___

17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so: Yes ___ No _X_ N/A ___ RMK#___

    a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes ___ No ❑ N/A _X_ RMK#___

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

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

GENERATORS TREATING HAZARDOUS WASTE

19. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40? Yes _X_ No ❑ N/A ___ RMK#___

20. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)] Yes _X_ No ❑ N/A ___ RMK#___

    a. A detailed chemical and physical analysis of a representative sample of the wastes being treated?[3745-270-07(A)(5)(a)] Yes _X_ No ❑ N/A ___ RMK#___

    b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] Yes _X_ No ❑ N/A ___ RMK#___

21. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] Yes _X_ No ❑ N/A ___ RMK#___

22. Has the generator followed the facility's WAP? [3745-270-07(A)(5) Yes _X_ No ❑ N/A ___ RMK#___

23. Have the treated wastes met the applicable treatment standards in 3745-270-40? Yes _X_ No ❑ N/A ___ RMK#___

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

24. Has the generator sent a notification and certification with the initial shipment of waste? [3745-270-07(A)(5)(c)] — Yes ___ No ❑ N/A _X_ RMK# _49_

25. Does each notification/certification form completed contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)] — Yes ___ No ❑ N/A _X_ RMK# _49_

26. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following: — Yes ___ No ❑ N/A _X_ RMK# _49_

    a. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] — Yes ___ No ❑ N/A _X_ RMK# _49_

    b. A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)] — Yes ___ No ❑ N/A _X_ RMK# _49_

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

27. Has the process/operation generating the waste or the solid waste landfill facility changed? If so: — Yes ___No_X_N/A ___RMK#___

    a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)] — Yes ___ No ❑ N/A _X_RMK#___

    b. Has the director been notified of such changes? [3745-270-09(D)] — Yes ___ No ❑ N/A _X_RMK#___

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

28. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: — Yes _X_ No ❑ N/A ___RMK#___

    a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49 (C)] — Yes _X_ No ❑ N/A ___RMK#___

29. Does each notification/certification form completed, contain the information found in Table1? [3745-270-07(A)(3)] — Yes _X_ No ❑ N/A ___RMK#___

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

HAZARDOUS DEBRIS

30. Does the material in question meet the definition of hazardous debris as defined in Rule 3745-270-02(A)(3)? Yes _X_ No ❑ N/A ___RMK#____

31. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.) Yes ____No_X_N/A ___RMK#____

32. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so: Yes _X_ No ❑ N/A ___RMK#____

    a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)] Yes _X_ No ❑ N/A ___RMK#____

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

33. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so: Yes _X_ No ❑ N/A ___RMK#____

    a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)] Yes _X_ No ❑ N/A ___RMK#____

34. Is the waste a PCB waste under 40 CFR Part 761? If so: Yes ____No_X_N/A ___RMK#____

    a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)] Yes ____ No ❑ N/A _X_RMK#____

35. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)] Yes _X_ No ❑ N/A ___RMK#____

36. Does the owner/operator of a treatment facility that claims the debris is excluded from regulation as a hazardous waste under 3745-51-03(F)(1) maintain the following information? Yes ___ No ❑ N/A _X_RMK#____

    a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)] Yes ___ No ❑ N/A _X_RMK#____

    b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)] Yes ___ No ❑ N/A _X_RMK#____

c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)] Yes ___ No ❑ N/A _X_ RMK#___

37. Do the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F)(1) have the following information? [3745-270-07(D)(3)] Yes ___ No ❑ N/A _X_ RMK#___

a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)] Yes ___ No ❑ N/A _X_ RMK#___

b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)] Yes ___ No ❑ N/A _X_ RMK#___

c. Technology used from Table 1? [3745-270-07(D)(1)(c)] Yes ___ No ❑ N/A _X_ RMK#___

38. Has the above notification been sent to the director? [3745-270-07(D)(1)] Yes ___ No ❑ N/A _X_ RMK#___

TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS

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

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

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

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

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

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

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

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

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

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

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

45. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have:

a. Copies of all notices and certifications required in 3745-270? — Yes _X_ No ☐ N/A ___ RMK#___

b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49? — Yes _X_ No ☐ N/A ___ RMK#___

c. The testing frequency specified in the facility's WAP and have they followed the protocol? — Yes _X_ No ☐ N/A ___ RMK#___

TANK SYSTEM REQUIREMENTS [OAC 3745-66-91 TO 3745-66-100]
(Please refer to the rules before or while completing this checklist.)

NOTE: ***New Tank System - Installation commencing after July 14, 1986.***
Existing Tank System - Installation or operation commencing on/before July 14, 1986.

1. **For an existing or new tank system(s)** has secondary containment been provided? [3745-66-93(A)(1) to (A)(5)] Yes _X_ No ❑ N/A ___ RMK#___

NOTES: A. ***Secondary containment must be provided for all new tank systems or components, prior to their being put into service. [3745-66-93(A)(1)]***

B. ***For an existing tank system(s) of known and documentable age secondary containment is required to be provided within two years after January 12, 1987, or when the tank system has reached 15 years of age, whichever came later. [3745-66-93(A)(3)]***

C. ***Secondary containment is required for all existing tanks for which the age cannot be documented. The tanks were required to have secondary containment within eight years of January 12, 1987 or when the tank system turned 15 years of age, whichever came later. [3745-66-93(A)4)]***

D. ***Tank systems that store/treat materials that become hazardous waste after January 12, 1987, must have secondary containment required within the time intervals in OAC 3745-66-93(A)(1) to (A)(4). The date the material became a hazardous waste must be used in place of January 12, 1987. [3745-66-93(A)(5)]***

E. ***If the tank system has no secondary containment, or a variance from secondary containment requirements has been granted, skip to the middle of page 6 of this Tank Systems Checklist; (Tank Systems without secondary containment)*** .

2. Is the secondary containment one of the following:

a. An **External Liner** [3745-66-93(E)(1)(a) - (1)(f)] If so, Yes _X_ No ❑ N/A ___ RMK# _50_

i. Is the liner designed or operated to contain 100% of the capacity of the largest tank? Yes _X_ No ❑ N/A ___RMK#___

ii. Is the liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? Yes _X_ No ❑ N/A ___RMK#___

iii. Is the liner free of cracks and gaps? Yes _X_ No ❑ N/A ___RMK#___

iv. Does the liner completely surround the tank and cover all earth likely to be contacted by waste during a release? Yes _X_ No ❑ N/A ___RMK#___

v. Are chemically resistant water stops in place at all joints? (*concrete liners only*) — Yes ___ No ❑ N/A _X_ RMK#___

vi. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? *(concrete liners only)* — Yes ___ No ❑ N/A _X_ RMK#___

b. **Vault System?** [3745-66-93(E)(2)(a) - (2)(f)] If so, — Yes ___ No _X_ N/A ___ RMK#___

i. Is vault system designed to contain 100% of the capacity in the largest tank? — Yes ___ No ❑ N/A _X_ RMK#___

ii. Is the vault system designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? — Yes ___ No ❑ N/A _X_ RMK#___

iii. Are chemically resistant water stops in place at all joints? — Yes ___ No ❑ N/A _X_ RMK#___

iv. Is there a compatible interior coating to prevent migration into the concrete? — Yes ___ No ❑ N/A _X_ RMK#___

v. For **ignitable or reactive waste**: Is the vault system provided with means to prevent against the formation or ignition of vapors? — Yes ___ No ❑ N/A _X_ RMK#___

vi Is the vault system provided with an exterior moisture barrier? — Yes ___ No ❑ N/A _X_ RMK#___

c. **Double-Walled Tank?** [3745-66-93(E)(3)(a) - (3)(c)] If so, — Yes _X_ No ❑ N/A ___ RMK# _50_

i. Is the double-walled tank designed as an integral structure to contain any release from the inner tank? — Yes _X_ No ❑ N/A ___ RMK#___

ii. **If metal**, are the primary tank interior and outer shell exterior surfaces protected from corrosion? — Yes ___ No ❑ N/A _X_ RMK#___

iii. Is the double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time? — Yes _X_ No ❑ N/A ___ RMK#___

3. Is the secondary containment system for the tank(s) an equivalent device as described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D)(E)] — Yes ___ No _X_ N/A ___ RMK#___

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

4. Has each secondary containment system been designed, installed and operated to prevent <u>any</u> migration of wastes or liquid to the soil, ground water, or surface water and is it capable of <u>detecting</u> and <u>collecting</u> releases and accumulated liquids? [3745-66-93(B)] — Yes _X_ No ❑ N/A ___RMK#___

5. Does the secondary containment system meet the following minimum requirements of 3745-66-93(C):

   a. Constructed or lined with compatible materials of sufficient strength to prevent failure? — Yes _X_ No ❑ N/A ___RMK#___

   b. Placed on a foundation or base capable of providing support? — Yes _X_ No ❑ N/A ___RMK#___

   c. Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time? — Yes _X_ No ❑ N/A ___RMK#___

   d. Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? — Yes _X_ No ❑ N/A ___RMK#___

   e. Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner? — Yes _X_ No ❑ N/A ___RMK#___

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

6. Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)? ***If not***, is the ancillary equipment: — Yes _X_ No___ N/A ___RMK#___

   a. Inspected daily? **AND**; — Yes ___ No ❑ N/A _X_ RMK#___

   b. Is ancillary equipment one of the following:

      i. Above ground piping (exclusive of flanges, joints, valves and connections)? — Yes ___ No ❑ N/A _X_ RMK#___

      ii. Welded flanges, welded joints and/or welded connections? — Yes ___ No ❑ N/A _X_ RMK#___

      iii. Sealless or magnetic coupling pumps and/or sealless valves? — Yes ___ No ❑ N/A _X_ RMK#___

iv. Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown, and/or loss of pressure-actuated shut-off devices)? Yes ___ No ❑ N/A _X_ RMK#___

NEW TANK SYSTEM REQUIREMENTS [OAC 3745-66-92]

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

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

a. Certification by an independent, registered, professional engineer? Yes _X_ No ❑ N/A ___ RMK#___

b. Consideration of the design standards of the system? Yes _X_ No ❑ N/A ___ RMK#___

c. Consideration of the hazardous characteristics of the waste(s)? Yes _X_ No ❑ N/A ___ RMK#___

d. An evaluation by a corrosion expert *(if the external system/components are metal)*? Yes_X_ No ❑ N/A ___ RMK#___

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

f. Design considerations to ensure that the tank foundations will maintain the load of a full tank? Yes _X_ No ❑ N/A ___ RMK#___

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

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

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

Do the written statements address all of the following:

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

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

c. Proper backfilling? [3745-66-92(C)] — Yes _X_ No ❑ N/A ___ RMK#___

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

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

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

TANK SYSTEMS WITHOUT SECONDARY CONTAINMENT [OAC 3745-66-91]

10. For existing tank system, without secondary containment: Is there a written assessment on file which includes the following considerations: [3745-66-91(A)(B)] — Yes ___ No ❑ N/A _X_ RMK#___

a. Design standards? [3745-66-91(B)(1)] — Yes ___ No ❑ N/A _X_ RMK#___

b. The characteristics of hazardous waste(s) that have been or will be handled? [3745-66-91(B)(2)] — Yes ___ No ❑ N/A _X_ RMK#___

c. Corrosion protection measures? [3745-66-91(B)(3)] — Yes ___ No ❑ N/A _X_ RMK#___

d. The age of the tank system has been estimated or documented? [3745-66-91(B)(4)] — Yes ___ No ❑ N/A _X_ RMK#___

e. A leak test has been conducted? *(For non-enterable underground tanks)* [3745-66-91(B)(5)(a)] — Yes ___ No ❑ N/A _X_ RMK#___

f. A leak test or an internal inspection by qualified P.E. has been conducted? *(For <u>other than</u> non-enterable underground tanks and for ancillary equipment)* [3745-66-91(B)(5)(b)] — Yes ___ No ❑ N/A _X_ RMK#___

g. Is assessment certified by an independent, registered P.E.? [3745-66-91(A)] — Yes ___ No ❑ N/A _X_ RMK#___

11. Have the tests specified in 10e and 10f been conducted annually on the tanks and ancillary equipment until secondary containment is provided? [3745-66-93(I)] ***If so,*** — Yes ___ No ❑ N/A _X_ RMK#___

a. Have tests been certified by an independent, registered P.E.? — Yes ___ No ❑ N/A _X_ RMK#___

12. For tanks without secondary containment used to store or treat wastes which become hazardous wastes after July 14, 1986, has the assessment been completed within 12 months of the date the waste became a hazardous waste? [3745-66-91(C)] — Yes ___ No ❑ N/A _X_ RMK#___

TANK SYSTEM - GENERAL OPERATING REQUIREMENTS [OAC 3745-66-94]

13. Does the o/o follow the general operating requirements below:

a. Does the o/o prevent placement of hazardous waste or treatment reagents in tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail? [3745-66-94(A)] — Yes _X_ No ❑ N/A ___ RMK#___

b. Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)? [3745-66-94(B)] — Yes _X_ No ❑ N/A ___ RMK#___

c. If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96? [3745-66-94(C)] — Yes ___ No ❑ N/A _X_ RMK#___

TANK SYSTEM - INSPECTION REQUIREMENTS [OAC 3745-66-95]

14. Has the o/o documented the inspections required in 3745-66-95, in the operating record, including inspection of the following:

a. Spill control equipment (daily)? [3745-66-95(A)(1)] — Yes _X_ No ❑ N/A ___ RMK#___

b. Above ground portion of tank (daily)? [3745-66-95(A)(2)] — Yes _X_ No ❑ N/A ___ RMK#___

c. Data from leak detection equipment (daily)? [3745-66-95(A)(3)] — Yes _X_ No ❑ N/A ___ RMK#___

d. Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste (daily)? [3745-66-95(A)(4)] — Yes _X_ No ❑ N/A ___ RMK#___

e. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(B)(1)] — Yes _X_ No ❑ N/A ___ RMK#___

f. Where applicable, all sources of impressed current at least bi-monthly? [3745-66-95(B)(2)] — Yes _X_ No ❑ N/A ___ RMK#___

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES [OAC 3745-66-98 AND 3745-66-99]

15. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with **one of the following:** [3745-66-98(A)]

    a. Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-65-17(B)? [3745-66-98(A)(1)]; **OR** — Yes ___ No ❑ N/A _X_ RMK# 28

    b. Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A)(2)]; **OR** — Yes ___ No ❑ N/A _X_ RMK#___

    c. The tank is used solely for emergencies? [3745-66-98(A)(3)] — Yes ___ No ❑ N/A _X_ RMK#___

16. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (1996)? [3745-66-98(B)] — Yes ___ No ❑ N/A _X_ RMK#___

17. Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material? [3745-66-99] — Yes ___ No ❑ N/A _X_ RMK#___

    a. ***If so,*** have the requirements of 3745-65-17(B) been met? — Yes ___ No ❑ N/A _X_ RMK#___

TANK SYSTEM - WASTE ANALYSIS REQUIREMENTS [OAC 3745-66-100]

18. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-100] — Yes ___ No ❑ N/A _X_ RMK# 51

    a. Conducted waste analysis and trial treatment or storage tests? [3745-66-100(A)]; OR — Yes ___ No ❑ N/A _X_ RMK#___

    b. Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-100(B)] — Yes ___ No ❑ N/A _X_ RMK#___

TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE [OAC 3745-66-96]

19. Has there been a leak or spill from any tank system or has any tank system been found unfit for use? ***If so***, did the o/o: — Yes ___ No _X_ N/A ___ RMK#___

a. Immediately cease flow of material into tank and investigate the cause of the release? [3745-66-96(A)] — Yes ___ No ❑ N/A _X_ RMK#___

b. Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time? [3745-66-96(B)(1)] — Yes ___ No ❑ N/A _X_ RMK#___

c. Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment? [3745-66-96(B)(2)] — Yes ___ No ❑ N/A _X_ RMK#___

d. Immediately conduct a visual inspection of the release? [3745-66-96(C)] — Yes ___ No ❑ N/A _X_ RMK#___

e. Prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C)(1)] — Yes ___ No ❑ N/A _X_ RMK#___

f. Properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)(2)] — Yes ___ No ❑ N/A _X_ RMK#___

g. Report the release to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)(2)] — Yes ___ No ❑ N/A _X_ RMK#___

h. Submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)] — Yes ___ No ❑ N/A _X_ RMK#___

i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)] — Yes ___ No ❑ N/A _X_ RMK#___

j. For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)] — Yes ___ No ❑ N/A _X_ RMK#___

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

20. In the event that the repairs to the tank system were major (replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from an independent, registered P.E. attesting that the repaired unit is capable of handling hazardous waste? [3745-66-96(F)] — Yes ___ No ❑ N/A _X_ RMK#___

a. Was a copy of the certification submitted to the director within seven days after returning the system to use? [3745-66-96(F)] — Yes ___ No ❑ N/A _X_ RMK#___

21. If the o/o was unable to repair and return the unit to service as described in 1.a through 1.e, was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)] — Yes ___ No ❑ N/A _X_ RMK#___

22. Does the o/o have a tank system **with a variance from secondary containment** from which a release has occurred but has not migrated beyond the zone of engineering control? **If so,** — Yes ___No_X_N/A ___RMK#___

a. Has the o/o complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G)(3)] — Yes ___ No ❑ N/A _X_ RMK#___

b. If soils cannot be decontaminated/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)] — Yes ___ No ❑ N/A _X_ RMK#___

23. Does the o/o have a tank system **with a variance from secondary containment** from which a release occurred and has migrated from the zone of engineering control? **If so,** — Yes ___No_X_N/A ___RMK#___

a. Has the o/o complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)] — Yes ___ No ❑ N/A _X_ RMK#___

b. If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(4)] — Yes ___ No ❑ N/A _X_ RMK#___

USED OIL INSPECTION CHECKLIST (Short Version)

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: — Yes ___ No _X_ N/A ___ RMK#___

   Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] — Yes ___ No ❑ N/A _X_ RMK#___

2. Is used oil being used as a dust suppressant? [3745-279-12(B)] — Yes ❑ No _X_ N/A ___ RMK#___

3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? — Yes ___ No ❑ N/A _X_ RMK#___

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [3745-279-21(A)] — Yes ___ No ❑ N/A _X_ RMK#___

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

6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] — Yes _X_ No ❑ N/A ___ RMK#___

7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] — Yes _X_ No ❑ N/A ___ RMK#___

8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] — Yes ___ No _X_ N/A ___ RMK# _52_

9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]

   a. Stopped the release? — Yes _X_ No ❑ N/A ___ RMK#___

   b. Contained the release? — Yes _X_ No ❑ N/A ___ RMK#___

c. Cleaned up and properly managed the used oil and other materials? Yes _X_ No ❑ N/A ___RMK#___

d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No ❑ N/A _X_RMK#___

10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes ___No_X_N/A ___RMK#___

a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? Yes ___ No ❑ N/A _X_RMK#___

b. Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour? Yes ___ No ❑ N/A _X_RMK#___

c. Are the combustion gases from heater vented to the ambient air? Yes ___ No ❑ N/A_X_RMK#___

11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes _X_ No ❑ N/A ___ RMK# _53_

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] Yes ___ No ❑ N/A _X_RMK#___

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

14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] Yes ___ No ❑ N/A _X_RMK#___

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes _X_ No ___ N/A ___ RMK# ___

SMALL QUANTITY UNIVERSAL WASTE CHECKLIST

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] — Yes ☐ No X N/A ___ RMK#___

2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] — Yes ☐ No X N/A ___ RMK#___

UNIVERSAL WASTE BATTERIES

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] — Yes ___ No ☐ N/A X RMK#___

4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] — Yes ___ No ☐ N/A X RMK# 54

5. Does the SQUWH conduct any of the following activities:

   a. Sort batteries by type? — Yes X No___ N/A ___ RMK# 55

   b. Mix battery types in one container? — Yes ___ No X N/A ___ RMK#___

   c. Discharge batteries to remove the electric charge? — Yes ___ No X N/A ___ RMK#___

   d. Regenerate used batteries? — Yes X No___ N/A ___ RMK# 55

   e. Disassemble them into individual batteries or cells? — Yes ___ No X N/A ___ RMK#___

   f. Remove batteries from consumer products? — Yes ___ No X N/A ___ RMK#___

   g. Remove the electrolyte from the battery? — Yes ___ No X N/A ___ RMK#___

   If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] — Yes ___ No X N/A ___ RMK#___

6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] — Yes ___ No ❑ N/A _X_ RMK#___

   a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] — Yes ___ No ❑ N/A _X_ RMK#___

   b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] — Yes ___ No ❑ N/A _X_ RMK#___

7. Are the battery(ies) or container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-14(A)] — Yes ___ No _X_ N/A ___ RMK# 55

UNIVERSAL WASTE PESTICIDES

8. Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)] — Yes ___ No N/A _X_ RMK#___

9. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)] — Yes ___ No ❑ N/A _X_ RMK#___

10. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97; 3745-66-100 and -66-101 of the OAC met? (Use tank checklist) [3745-273-13(B)(3)] — Yes ___ No ❑ N/A _X_ RMK#___

11. If pesticides are stored in a transport vehicle, is it closed, structurally sound and compatible with the pesticide(s)? [3745-273-13(B)(4)] — Yes ___ No ❑ N/A _X_ RMK#___

12. Are containers, tanks, or transport vehicles that contain universal waste pesticides, labeled with either "Universal Waste Pesticides"or "Waste Pesticides?" [3745-273-14(B)] — Yes ___ No ❑ N/A _X_ RMK#___

UNIVERSAL WASTE THERMOSTATS

13. Are thermostats that show evidence of leaking, spilling, or damage that could cause leaks, properly contained? [3745-273-13(C)(1)] — Yes ___ No ❑ N/A _X_ RMK#___

14. If the thermostats are contained, are the containers closed, structurally sound, compatible with contents of the thermostats and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(C)(1)] — Yes ___ No ❑ N/A _X_ RMK#___

15. If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)] — Yes ___ No ❑ N/A _X_ RMK#___

    a. Remove the ampules in a manner to prevent breakage and are they removed over or in a containment device? [3745-273-13(C)(2)(a)(b)] — Yes ___ No ❑ N/A _X_ RMK#___

    b. Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)(d)] — Yes ___ No ❑ N/A _X_ RMK#___

    c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)] — Yes ___ No ❑ N/A _X_ RMK#___

    d. Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)] — Yes ___ No ❑ N/A _X_ RMK#___

    e. Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)] — Yes ___ No ❑ N/A _X_ RMK#___

    f. Pack removed ampules in containers with packing material to prevent breaking during storage, handling and transportation? [3745-273-13(C)(2)(h)] — Yes ___ No ❑ N/A _X_ RMK#___

16. If mercury, clean-up residues, or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-13(C)(3)(a) — Yes ___ No ❑ N/A _X_ RMK#___

a. If the waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to Chapter 3745-52.) [3745-273-13]

Yes ___ No ❑ N/A _X_ RMK#___

b. If the mercury, residues and/or other wastes are not hazardous, are they managed in compliance with applicable law? [3745-273-13(C)(3)(c)

Yes ___ No ❑ N/A _X_ RMK#___

17. Are thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)?" [3745-273-14[D]

Yes ___ No ❑ N/A _X_ RMK#___

UNIVERSAL WASTE LAMPS

18. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]

Yes ___ No ❑ N/A _X_ RMK# 56

19. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]

Yes ___ No ❑ N/A _X_ RMK#___

20. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)]

Yes ___ No ❑ N/A _X_ RMK#___

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

ACCUMULATION TIME

21. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: — Yes _X_ No___ N/A ___ RMK#___

    a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] — Yes ___ No ❑ N/A _X_ RMK#___

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

22. Is the length of time the universal waste is stored documented by **one** of the following: [3745-273-15(C)] — Yes _X_ No ❑ N/A ___ RMK#___

    a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] — Yes ___ No ❑ N/A _X_ RMK#___

    b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] — Yes ___ No _X_ N/A ___ RMK# _55_

    c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] — Yes ___ No ❑ N/A _X_ RMK#___

    d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] — Yes ___ No ❑ N/A _X_ RMK#___

    e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] — Yes ___ No ❑ N/A _X_ RMK#___

    f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] — Yes ___ No ❑ N/A _X_ RMK#___

EMPLOYEE TRAINING

23. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]

Yes _X_ No ❑ N/A ___RMK#____

RESPONSE TO RELEASES

24. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]

Yes ___ No ❑ N/A _X_RMK#____

25. Is the material released characterized? [3745-273-17(B)]

Yes ___ No ❑ N/A _X_RMK#____

26. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)]

Yes ___ No ❑ N/A _X_RMK#____

OFF-SITE SHIPMENTS

NOTE: If a SQUWH self-transports waste, then they must comply with the Universal Waste transporter requirements.

27. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]

Yes _X_ No ❑ N/A ___RMK#_55_

NOTE: SQUWHs are prohibited to send waste to any other facility.

28. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)]

Yes _X_ No ❑ N/A ___RMK#____

29. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)]

Yes _X_ No ❑ N/A ___RMK#____

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

a. Receive the waste back? [3745-273-18(E)(1)]

Yes ___No___N/A _X_RMK#____

b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] — Yes ___No___N/A _X_RMK#___

31. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following: — Yes ___ No ❑ N/A _X_RMK#___

a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] — Yes ___No___N/A _X_RMK#___

b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] — Yes ___No___N/A _X_RMK#___

32. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] — Yes ___ No ❑ N/A _X_RMK#___

33. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] — Yes ___ No ❑ N/A _X_RMK#___

EXPORTS

34. Is waste being sent to a foreign destination? If so: — Yes ___No_X_N/A ___RMK#___

a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] — Yes ___ No ❑ N/A _X_RMK#___

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)] — Yes ___ No ❑ N/A _X_RMK#___

c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] — Yes ___ No ❑ N/A _X_RMK#___

REMARKS

1. ESOI has violated several permit conditions which are outlined in this checklist and NOV letter.
2. ESOI's renewal permit was issued final on December 29, 2005. The renewal permit expires on December 29, 2015.
3. On February 3, 2007 ESOI reported a leak at the M4 primary riser. ESOI mailed a report of this incident to Ohio EPA on February 12, 2007.
4. ESOI is implementing corrective measures for the old waste management units located North of York Street.
5. ESOI has requested confidentiality for customer information and stabilization plant processes.
6. A modified closure plan and post-closure plan was submitted to Ohio EPA on March 29, 2006.
7. ESOI's March 19, 2007 permit modification included a modified closure and post-closure cost estimate.
8. The laboratory QAP was last reviewed on October 3, 2006.
9. ESOI submitted a revised permit application to Ohio EPA in July 2006. This "clean copy" of the facility permit application was approved by Ohio EPA.
10. ESOI has not accepted F027 since the date of the last CEI inspection.
11. As of 05/30/07 ESOI had received 88,806.90 tons of waste (includes on-site waste, and both RCRA and Non-RCRA waste). In 2006, ESOI treated a total of 229,307 tons of RCRA waste and placed 233,628 tons of RCRA waste into Cell M.
12. Debris / Non-debris issues have been noted during the fingerprint analysis.
13. Responses are missing on "Weekly Scale Area Inspection Forms MF-05" for the dates 04/25/07 (question 9C) , 05/02/07 (question 9F) and 05/23/07 (question 9F). "Rail Car Inspection Form - Outbound MF-18(b)" for 03/06/07 is dated and signed, but the remainder of the form documenting the "Condition/Inspection Area" is left blank.
14. Emergency telephones located at LSTB and Rail Spur have been removed from the structures. However, ESOI employees carry two-way radios in case of an emergency.
15. The contingency plan was last reviewed on March 12, 2007.
16. ESOI has not received any waste from a foreign source since the date of the last CEI inspection.
17. Per Ohio EPA inspection of incoming waste receipts since the last CEI inspection, ESOI has rectified all manifest discrepancies.

18. ESOI submitted their 2006 annual report on March 5, 2007.

19. Inactive portions of ESOI have been closed. Cell M, container storage areas, tank storage areas, the SCB and the LSTB remain operational.

20. Section I of the facility permit application has been submitted but remains under review by Ohio EPA.

21. Cell M remains active and is expected to be active until 2012.

22. Post-closure care is on-going for the closed RCRA regulated cells at the facility. None of these closed cells have reached their 30-year post-closure care period. Cell M remains active.

23. During the site inspection conducted on May 29, 2007, rail car NAHX 455535 was found to be unlabeled while in storage in Area N.

24. ESOI failed to properly and completely fill out the Inbound and Outbound Rail Car Inspection Forms – MF-16(a) & (b). Ohio EPA found thirteen separate instances over the months of January, February, March and May where these forms are incorrectly completed.

    - Dates and days of the week on specific forms do not match-up.
    - Railcars arrive/leave the facility without any record of these movements.
    - Railcars appear on outbound forms before they arrive on site on an inbound form. (ACFX 47049 on 03/14/07 MF-16(a))
    - Some forms appear to be missing completely – 03/09/07 MF-16(b)
    - Some forms are not completed. 03/06/07 MF-16(b)
    - Cars appear to arrive on one form and then leave on two separate dates/forms (ACFX 49741 leaves on 01/19/07 and 01/22/07).

25. ESOI has not closed any container storage areas since the last CEI inspection.

26. ESOI has not constructed tanks S-4, S-5, S-6 or S-7 since the date of the last CEI inspection.

27. ESOI has not generated, treated, or stored ignitable, reactive or incompatible hazardous waste since the date of the last CEI inspection. The leachate stored in the Leachate storage tanks is managed as F039/ D002 hazardous waste.

28. Tank S-100 was inspected internally on 03/22/07 and externally on 04/02/07. Tank S-200 was inspected internally on 04/16/07 and externally on 05/01/07. Tank S-300 was inspected internally on 04/09/07 and externally on 04/16/07. Tank S-400 was inspected internally on 04/02/07 and externally on 04/09/07. Ultrasonic testing was conducted on all four tanks on 05/01/07. The secondary containment inspections for all four tanks were completed concurrently with each tank's external inspection.

29. During the site inspection conducted on May 29, 2007, waste was found to exceed the height of the sidewalls in Sort Floor #1 by Door #133. ESOI's Daily Stabilization/Containment Plant Inspection Forms MF-02(b) completed for May 25, 2007 and May 29, 2007 indicate that the "waste height (is) below sidewalls" in the sort bin unloading area.

30. During the site inspection conducted on June 1, 2007, waste tracking was observed at Door #138.

31. During the site inspections conducted on June 1st, 4th, and 5th, 2007, and upon reviewing ESOI's Stabilization Plant Door Inspection Logs it was found that ESOI failed to properly inspect the entrance aprons and/or remove all tracked or fallen waste at Doors #138 and #201.

32. ESOI failed to properly inspect the containment pad and failed to remove tracked or fallen waste outside Door #121 from a shipment received on the afternoon of June 12, 2007. Ohio EPA observed and photographed waste on the containment pad outside Door #121 around 3:52 p.m. on June 12, 2007. This waste was again observed (and photographed) on the containment pad outside Door #121 by Ohio EPA at around 11:10 a.m. on June 13, 2007. Ohio EPA notified ESOI of the situation and, with an ESOI representative present, observed the waste on the containment pad at around 3:00 p.m. on June 13, 2007.

33. ESOI failed to maintain any log recording all inspections and any actions taken at the entrance apron for Door #201. ESOI also failed to properly complete and maintain a log recording inspections and any actions taken at the entrance apron for Door #138.

34. ESOI appears to be following the procedures of the RAP. However, the RAP has not been required to be implemented because no leaks greater than acceptable leakage rates have been observed or noted.

35. ESOI has not conducted macro-encapsulation since the date of the last CEI inspection.

36. ESOI has not removed, nor has Ohio EPA requested the removal of, any hazardous waste residues, liner, or contaminated soils from the site since the date of the last CEI inspection.

37. The Toledo Waterline Inspection form indicates that the liquid level in the waterline trenches is measured and is below the invert elevation of the adjacent waterlines. However, the inspection form does not indicate how this determination is made. As previously recommended during the December 2006 CEI exit interview, Ohio EPA again asks that ESOI indicate the invert elevation and the waterline trench liquid level on the inspection form.

38. Burrow holes were observed on the closed cells by Ohio EPA on May 29, 2007. Ohio EPA observed two holes near the NW corner of the top tier of Cell I and two on the north side of the top tier of Cell H near the surface water impoundment. ESOI filled these holes with bentonite on May 29, 2007. ESOI hires a trapper to remove rodents from the property and ESOI has filled in the holes several times a year. Ohio EPA recommends that ESOI document the location of any observed holes, the date the holes were observed and filled, the dates that the trapper is on-site, and the date and number of rodents captured in the facility operating record to demonstrate that the facility is actively monitoring, minimizing and repairing holes in the closed cell caps.

39. ESOI continues to remove leachate from Cells F, G, H, I and M.

40. During the December '06 CEI, ESOI was notified about an area of distressed and/or dead vegetation located on the southeast corner of the central sanitary landfill. This area of distressed and/or dead vegetation was still visible during the May '07 CEI. ESOI indicated that this area is being addressed through corrective action activities.

41. During the site inspection of May 29, 2007, Ohio EPA observed that the barbed wire was missing on a section of the fence line north of the North Sanitary Landfill near well PB-11. ESOI replaced the barbed wire on May 29, 2007.

42. In 2006, ESOI completed the construction of a final cap on Phase 1 of Cell M with the exception of seeding for vegetation. ESOI has failed to maintain and seed the final cap on Phase 1 of Cell M as outlined in Appendix D.6 (Sections 4, 5, and 9) of ESOI's RCRA Part B Permit Application. ESOI has also failed to control erosion, maintain the temporary cap (dikes) on the remainder of Cell M, and maintain the surface water drainage ditches as outlined in the surface water management plan for Cell M (Volume 6, Appendix D.24 of the permit application) as requested by Ohio EPA throughout 2005 and 2006.

43. ESOI has completed 12 consecutive months of waste strength testing on Cell M. All samples exceeded the 2000 psf requirement. Therefore, ESOI requested and has been granted an alternative schedule to test the strength of the waste in Cell M on a bimonthly basis.

44. ESOI has allowed the leachate to exceed one foot on the primary liner on several occasions since the December 2006 CEI. Ohio EPA continues to evaluate ESOI's compliance with this requirement.

45. ESOI has not reported to Ohio EPA that they have observed enough leachate generation from the secondary liner to implement the RAP for Cell M.

46. ESOI has not accepted F020, F021, F022, F023, F026, or F027 waste since the date of the last CEI inspection.

47. ESOI does not offer for transport containers of hazardous waste that are smaller than 110 gallons.

48. ESOI generates hazardous waste PPE, lab samples, baghouse dust, well cuttings, etc. which are treated and disposed of on-site. ESOI generates waste water and leachate which is not treated on-site and is disposed of off-site.

49. ESOI tanks S-100, S-200, S-300 and S-400 are protected with an external secondary containment liner. ESOI's lab tanks and SCB employee decontamination tanks 403 and 404 are double walled non-metallic tanks.

50. ESOI has not used the tank system to store or treat a waste which is substantially different or uses a substantially different process than previously used. ESOI's tanks store wastewater from the SCB, leachate from the various hazardous waste cells located on-site, and laboratory waste.

51. During the site inspection on May 29, 2007, Ohio EPA observed that two full used oil collection pans and the used oil reservoir drain pan were not labeled or marked "Used Oil".

52. Used oil is transported off-site by DISC Environmental Services Inc.

53. ESOI indicates that they do sometimes see leakage from the batteries they are recharging. Batteries that show evidence of leakage from this charging activity should be properly contained.

54. ESOI generates universal waste lead acid batteries from on-site equipment. These batteries are stored in a room in Building C. Used batteries are supposed to be marked with the month and year that they are placed into the storage area. ESOI has not been marking or labeling their used batteries.

    Used batteries are picked up by D&J Supply, 1929 Star Avenue, Toledo, Ohio, who sells ESOI replacement batteries.

55. Lamps generated by ESOI are managed as hazardous waste, not universal waste, and are treated in the SCB and disposed of on-site.

56. ESOI reported instances of non-compliance with Permit Condition J.3(a) on January 26, 2007 (Cell M Leachate Report, December 2006) and March 7, 2007 (Cell M Leachate Report, January 2007).