



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, Ohio 43402

TELE: (419) 352-8461 FAX: (419) 352-8466
www.epa.state.oh.us

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

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

January 18, 2007

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

Dear Mr. Humphrey:

On December 6, 2006, through December 19, 2006, Chris Maslo 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 yourself 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 December 19, 2006, 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 Condition B.5(a) and OAC Rule 3745-54-15**

Permit Condition B.5(a) states that, "The Permittee must require inspectors to sign and print their names on inspection checklists after indicating the status of the items inspected. Items not inspected must be marked "NI" on the checklist."

During the inspection, Ohio EPA noted problems with the following inspection forms:

- a. "City of Toledo Raw Waterline Security Agreement Weekly Inspection Form WL-100" dated 07/10/06 is signed but all questions on Page 1 of 1 are blank.

- b. "Daily Site Inspection Form M-F-02(a) Frequency – Daily" dated 05/23/06 is signed and is filled out except questions 1)F), 1)G), 1)H) and 2)A-D), which are blank.
- c. "Daily Site Inspection Form M-F-02(a) Frequency – Daily" dated 07/06/06 is signed, but Page 2 of 2 is blank.
- d. "Leachate Tank Storage Inspection Form MF-04(a) Frequency – Weekly & After Storms (2" in 8 hrs)" dated 07/12/06 is signed, but all questions on Pages 1 of 2 and 2 of 2 are blank.
- e. "Safety & Fire Equipment Inspection Form MF-11 Frequency – Weekly" dated 07/04/06 is marked "Holiday" and all questions are blank.

ESOI abated this violation by completing the remainder of the inspections reviewed during the inspection.

2. Permit Condition C.4 and OAC Rule 3745-55-71

Permit Condition C.4 states that "If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee must transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit and the hazardous waste facility chapters of the OAC.

During the site inspection conducted on Wednesday, December 6, 2006, box 19924 holding waste 611270026 on Area O (Cell M) was observed with rust holes on the side of the box with the plastic liner visible. The holes were approximately a quarter in size, but waste was not observed leaking from the holes. ESOI immediately transferred the waste out of this box and took this box out of service.

This violation is considered abated since ESOI removed the waste from the container and removed it from service. However, ESOI should carefully inspect each roll-off container used to store hazardous waste prior to placing waste in the container.

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

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 that ESOI recorded no inspections on "Rail Car Inspection Form – Inbound M-F-16(a) Frequency – Inbound Rail Car" or "Rail Car Inspection Form – Outbound M-F-16(b) Frequency – Outbound Rail Car" forms from July 4 through July 9, 2006. The "ESOI Load Detail Summary Report" form indicates that the facility received four rail cars on July 5, 2006, five rail cars on July 6, 2006 and five rail cars on July 7, 2006. In addition, the "ESOI Load Detail Summary Report" forms indicate that ESOI received waste by rail on October 9 (5 rail cars), October 10 (4 rail cars), October 12 (4 rail cars), November 6 (5 rail cars), November 7 (5 rail cars), November 9 (10 rail cars), November 13 (5 rail cars) and November 29 (5 rail cars). "Rail Car Inspection Form – Inbound M-F-16(a) Frequency – Inbound Rail Car" Daily Rail Inbound and Rail Outbound inspection forms do not correspond to these records on these dates. The Rail inspection logs indicate that of the 4 rail shipments received on October 9, 2006, only one was recorded on the outbound rail dated October 11, 2006. ESOI has no record of the 4 rail shipments received on October 12, 2006 leaving the facility. In addition, there are no inspection logs for the inbound or outbound rail storage areas for the other dates mentioned above.

ESOI abated this violation by inspecting the inbound and outbound rail storage areas for the remainder of the dates reviewed that rail cars entered or exited the facility.

4. **Permit Condition D.4(h) and OAC Rule 3745-55-93**

Permit Condition D.4(h) states that "The Permittee must remove liquids or sludge from the secondary containment systems within twenty-four (24) hours, or in as timely a manner as possible, after the inspection during which the materials were found in these areas."

During the inspection, Ohio EPA noted that on the "Leachate Storage Building Tanks Inspection Form MF-03-(a) Frequency – Daily" forms dated 05/27/06, 05/28/06, 05/29/06 and 05/30/06 the inspection forms note "water in sump." However, the inspection form indicates that the sump was not pumped until 05/30/06. On 09/03/06, 09/04/06 and 09/05/06 the inspection form notes "water in the sump." However, the inspection form indicates that the sump was not pumped until 09/05/06. On 11/11/06, 11/12/06 and 11/13/06 the inspection form notes "water in sump." However, the inspection form indicates that the sump was not pumped until 11/13/06.

ESOI abated this violation by removing liquids from the leachate storage building sumps within 24 hours for the remainder of the dates reviewed during the inspection.

5. **Permit Condition I.2(e)(iv) and OAC Rule 3745-55-17**

Permit Condition I.2(e)(iv) states that the Permittee must inspect the ground water monitoring wells on a weekly basis. In addition, all of the ground water monitoring wells must have locking caps and remain locked except when being sampled.

During the inspection, and continuing through at least January 4, 2007, Ohio EPA observed that the lock for monitoring well H-4S was sitting on top of the well protective casing and that the casing was not locked. It appears that the locking clasp on the casing is broken.

To abate this violation, ESOL must immediately repair the well protective casing and lock the monitoring well.

6. OAC Rule 3745-52-11

OAC Rule 3745-52-11 states that any person who generates a waste must determine if the waste is a listed and/or characteristic hazardous waste.

During the inspection, Ohio EPA noted that ESOL manages leachate in the leachate storage tanks as F039 hazardous waste and ships under the same waste code to an off-site disposal facility. The off-site disposal facility has noted a discrepancy on numerous occasions that the leachate also exhibits the D002 hazardous waste characteristic. ESOL indicated that the facility relies on the disposal facility to make the pH determination during the exit interview.

To abate this violation, ESOL must either test the waste in each leachate storage tank prior to the waste being offered for transportation or ESOL must include the D002 hazardous waste characteristic to the F039 listing for the waste in the leachate storage tanks.

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

1. Permit Condition B.5 states in part, "The Permittee must follow the inspection schedule set forth in Section F of the Permit Application."

During the inspection, Ohio EPA noted that on ESOL's inspection form titled, "Safety & Fire Equipment Inspection Form MF-11 Frequency - Weekly" the form dated 07/04/06 is marked "Holiday" and all questions are left blank. This inspection form indicates that the safety and fire equipment inspection should be conducted on a weekly basis. ESOL recorded no inspection of the safety and fire equipment between 06/27/06 and 07/11/06, a period of 14 days.

The Ohio Revised Code defines weekly as a period of seven days. ESOL should either complete inspections on holidays or complete the inspections before and after the holiday to ensure that inspections are conducted at least every seven days.

2. Permit Condition B.5(f)(i) states that, "The Permittee must inspect all tank storage areas on a weekly basis and after a rainfall event (2 or more inches of rainfall in 8 hours)."

During the inspection, Ohio EPA noted that on ESOI's inspection form titled, "Leachate Tank Storage Inspection Form MF-04(a) Frequency – Weekly & After Storms (2" in 8 hrs)" the form dated 07/12/06 is signed but all questions on Pages 1 of 2 and 2 of 2 are blank. Ohio EPA noted that the previous inspection was conducted on 07/05/06 and the next inspection was conducted on 07/15/06, which is a period of ten (10) days.

The Ohio Revised Code defines weekly as a period of seven days. ESOI's inspection forms should be reviewed by management personnel to ensure that they are completely filled out and conducted on a weekly basis.

3. Permit Condition B.9(a) states that "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 that "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 this 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 either 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.

4. Permit Condition B.24(a) states that "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 waste from off-site generators under manifest #000287634 JJK, #000287635 JJK and #001188433 JJK on October 3, 2006, which contained weight discrepancies of greater than 10%. ESOI failed to mark the manifest in the appropriate box to indicate a weight discrepancy but rather marked the manifest in the "Special Handling Instructions and Additional Information" box to indicate that the generators accepted ESOI's scale weight.

ESOI must mark weight discrepancies in the appropriate box of the Universal Hazardous Waste Manifest.

5. Permit Condition G.4(a) states in part that ESOI must inspect one time per week the City of Toledo Waterline easement, monitoring trench cap and collection sumps for evidence of leaks, degradation, damage and liquids.

During the inspection, Ohio EPA noted that ESOI did not record any inspections of the City of Toledo Raw Waterline between July 3, 2006 and July 17, 2006, a period of 14 days. The "City of Toledo Raw Waterline Security Agreement Weekly Inspection Form WL-100" dated 07/10/06 is signed, but the remainder of the form is blank.

The Ohio Revised Code defines weekly as a period of seven days. ESOI's inspection forms should be reviewed by management personnel to ensure that they are completely filled out and conducted on a weekly basis.

6. 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 the closed cells on December 6 and 12, 2006. Ohio EPA observed one hole in the south side of Cell I and on the south side of Cell H. 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. ESOI has not constructed and final cap on Cell M.

However, ESOI has completed the construction of a cap on Phase 1 of Cell M with the exception of seeding for vegetation. Ohio EPA expects ESOI to begin seeding this area in the spring 2007.

7. Permit Condition I.2(d)(v)(a) states that the Permittee must cut grass as needed, but at least annually. The Permittee must also remove and replace dead or damaged vegetation. In addition, the Permittee must not allow trees, shrubs, or other deep-rooted plants to grow on closed waste units. The Permittee must remove trees, shrubs or other deep-rooted plants the fall quarter each year.

Ohio EPA observed that ESOI mows and cuts grass and vegetative growth annually. However, during the inspection, Ohio EPA noted two small shrubs on the west side of Cell G. Ohio EPA observed on the following day that ESOI cut these shrubs. Please be advised that this permit condition requires the removal of these shrubs in addition to cutting down the above ground growth. Therefore, ESOI must remove these shrubs from the cell cover system.

Ohio EPA also noted two areas of distressed and/or dead vegetation during the inspection. 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.

8. Permit Condition I.2(d)(v)(d) states that the Permittee must maintain all existing drainage ditches.

Ohio EPA has noted that the storm water culverts around Cell M require frequent maintenance due in part to the lack of vegetation on the side slopes of the cell. ESOI must continue to maintain the surface water ditches and culverts as needed.

9. Permit Condition J.3(a) states in part, "The level of leachate accumulation on the primary synthetic liner, excluding the sumps, must not exceed the height of one foot, except for temporary excursions in Cell M following a precipitation event. The Permittee must return to a leachate level of less than 10 inches in Cell M after the precipitation event that triggered the temporary excursion by operating the pumps in the affected landfill collection sumps 24 hours per day, 7 days per week.

Since the date of the last CEI inspection, Ohio EPA has observed several instances of excursions of this rule. Ohio EPA is evaluating ESOI's operations for compliance with this rule. Ohio EPA's conclusions will be addressed in a separate letter.

10. Permit Condition J.5(a) states "The Permittee must inspect Cell M in accordance with the Inspection Schedule found in Section F of the permit application and must complete the items in Permit Conditions J.5(b) and J.5(c) as proof of those inspections."

Ohio EPA noted during the inspection that ESOI recorded no inspections on the "Landfill Area Inspection Form MF-09(a) Frequency - Weekly & After Storms (2" in 8 hrs) from June 12, 2006 to June 22, 2006.

The Ohio Revised Code defines weekly as a period of seven days. ESOI's inspection forms should be reviewed by management personnel to ensure that they are completely filled out and conducted on a weekly basis.

11. OAC Rule 3745-52-20(A) states that a generator who offers a hazardous waste for off-site transportation must prepare a uniform hazardous waste manifest and must complete items one through twenty on the manifest.

During the inspection, Ohio EPA noted that Manifest #000940559 from ESOI to EQ Detroit shipped on November 21, 2006 had no quantity in Box 11. Manifest MI 9453376 from ESOI to EQ Detroit shipped on May 22, 2006 had no quantity in Box 13.

ESOI should reconcile the missing information on these two manifests.

12. Ohio EPA noted that several of ESOI's leachate storage building inspection forms indicate that an ESOI employee has noted rust and/or corrosion on the secondary containment structure for tanks S-100, S-200, S-300 and S-400. ESOI should place a notation in the observation section or additional notes section of the inspection form to indicate if the rust is superficial or if it compromises the integrity of the secondary containment or if any remedial actions have taken place.
13. During the inspection, Ohio EPA observed that the disposal facilities where ESOI sends its leachate are improperly modifying the hazardous waste description on the corresponding manifest. Ohio EPA observed problems with the following manifests:
 - a. Manifest #000940554 from ESOI to EQ Detroit shipped on November 20, 2006. EQ crossed out hazardous waste description in Box 9b and added D002. No discrepancy noted in Box 18a.
 - b. Manifest MI 10129871 from ESOI to EQ Detroit shipped on September 1, 2006. EQ crossed out hazardous waste description in Box 11 and added D002. No discrepancy noted in Box 19.
 - c. Manifest MI 10129794 from ESOI to EQ Detroit shipped on August 2, 2006. EQ dated receipt of waste on August 1, 2006.
 - d. Manifest MI 10129820 from ESOI to EQ Detroit shipped on August 14, 2006. EQ dated receipt of waste on August 4, 2006.
 - e. Manifest MI 9453374 from ESOI to EQ Detroit shipped on June 23, 2006. Transporter and EQ dated receipt of waste on May 23, 2006.
 - f. Manifest 000288391 from ESOI to EQ Detroit shipped on October 20, 2006. EQ crossed out waste description in Box 9b and added new waste description. EQ used a non-existent UN# "UN32166."

In addition, ESOI appears to be shipping all waste as F039 listed hazardous waste only. It appears that when the disposal facility determines that the waste also exhibits the hazardous waste characteristic of D002, the disposal facility is crossing out the original waste description and adding D002 to Box 9b on the Universal Waste Manifest. The disposal facility should not be crossing out the original waste description because the waste remains an F039 hazardous waste. ESOI should notify the disposal facilities of these incorrect entries.

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

Mr. Kenneth Humphrey
January 18, 2007
Page Nine

15. 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.
16. It appears that leachate is permeating the patch located on the northeast corner of the North Sanitary Landfill (SWMU 6). ESOI should address this immediately.

ESOI should respond to this letter within ten (10) 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)373-3056.

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,



Gary S. Deutschman
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
Cindy Lohrbach, DHWM, NWDO

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

<p>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.</p>

**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): December 6-19, 2006

Inspection Time(s): 10:30 am to 3:30 pm

Inspection Announced? Yes No If yes, how much advanced notice given _____

Name Affiliation Telephone

Inspector(s): Chris Maslo Ohio EPA - DHWM 419-698-3130

Gary Deutschman Ohio EPA - DHWM 419-373-3056

Facility Representative(s): Ken Humphrey ESOI 419-698-3500

Don Steyer ESOI 419-698-3500

Bob Morris ESOI 419-698-3500

Is the facility operating as a generator? Yes No

Are Land Disposal Restricted wastes managed? 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	
<input checked="" type="checkbox"/>	Container	<input type="checkbox"/>	Tank	<input type="checkbox"/>	Injection Well
<input checked="" type="checkbox"/>	Tank	<input type="checkbox"/>	Surface Impoundment	<input checked="" type="checkbox"/>	Landfill
<input type="checkbox"/>	Waste Pile	<input type="checkbox"/>	Incinerator	<input type="checkbox"/>	Land Application
<input type="checkbox"/>	Surface Impoundment	<input type="checkbox"/>	Thermal Treatment	<input type="checkbox"/>	Surface Impoundment
<input type="checkbox"/>		<input checked="" type="checkbox"/>	Chem. Stab. in Containers	<input type="checkbox"/>	
<input type="checkbox"/>		<input checked="" type="checkbox"/>	Chem. Stab. in Containers	<input type="checkbox"/>	

E-mail this completed form to tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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2. Site EPA ID No.	EPA ID Number: OHD 045 243 706
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3. Site Name	Name: EnviroSAFE Services of Ohio, Inc.	Website (optional):	www.envirosafeservices.com
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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
	<input type="checkbox"/>							

6. NAICS code(s) www.census.gov/eppd/www/naics.html	A.	B.
	C.	D.

Facility Representative Additional information to be received in number 12 Only provide information if different than 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: 876 Otter Creek Road			
	City, Town or Village: Oregon			
	State: OH		Country: Lucas	Zip Code: 43616

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.	A. Name of Site's Legal Owner:		Date Became Owner (mm/dd/yyyy):						
	Owner Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
	<input type="checkbox"/>								
	Street or P.O. Box:								
	City, Town, or Village:				Owner Phone #:				
	State:			Country:			Zip Code:		
	B. Name of Site's Operator:		Date Became Operator (mm/dd/yyyy):						
	Operator Type: Mark with an X	Private	County	District	Federal	Indian	Municipal	State	Other
	<input type="checkbox"/>								
	Street or P.O. Box:								
	City, Town, or Village:				Operator Phone #:				
	State:			Country:			Zip Code:		

9. Violations Cited	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
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10. Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes.)
<input type="checkbox"/> Not Regulated

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

A. Hazardous Waste Activities

(choose only one of the following categories)

UNKNOWN: Cited for violation of 3745-52-11

a. Large Quantity Generator (LQG):

b. Small Quantity Generator (SQG)

c. Conditionally Exempt Small Quantity Generator

d. United States Importer of Hazardous Waste

e. Mixed Waste (hazardous and radioactive) Generator

3. Treater, Storer or Disposer of Hazardous Waste

4. Recycler of Hazardous Waste

5. Exempt Boiler and/or Industrial Furnace

a. Small Quantity On-site Burner Exemption

b. Smelting, Melting, Refining Furnace Exemption

6. Underground Injection Control Facility

B. Universal Waste Activities

1. Small Quantity Handler of Universal Waste

(Indicate types of universal waste generated and/or accumulated (check all boxes that apply):

2. Large Quantity Handler of Universal Waste

(accumulates 5,000 kg or more).

3. Destination Facility for Universal Waste

(Check all boxes below that apply for each of the three types of facilities above.)

	Generated	Accumulated
A. Batteries	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
B. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
C. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
D. Lamps	<input type="checkbox"/>	<input type="checkbox"/>

C. Used Oil Activities

1. Used Oil Generator

2. Used Oil Transporter Indicate Type(s) of Activity(ies)

Transporter

Transfer Facility

3. Used Oil Processor and/or Re-refiner Indicate Type(s) of Activity(ies)

Processor

Re-refiner

4. Off-Specification Used Oil Burner

5. Used Oil Fuel Marketer -

Indicate Type(s) of Activity(ies)

a. Marketer Who Directs Shipment of Off-Specification Oil

b. Used Oil to Off-Specification Used Oil Burner

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your 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.

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12. Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.

Y / X	Announced ?	Additional Facility Representatives:	Don Steyer, VP of Operations; Herb Snider, Landfill Manager; and, Bob Morris, Personnel/Safety-Training Manager.
X / N	Tanks?	Other comments:	
X / N	Containers?		

13	Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
	Chris Maslo, Gary Deutschman		12/06/06 - 12/19/06

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)
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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 No N/A RMK# _____
 - a. If so, what has the company done to minimize waste generation?
 - A change in the process resulting in less waste.
 - A change in the product resulting in less waste.
 - Use of fewer and less toxic hazardous raw materials.
 - Better operations/improved housekeeping.
 - On-site recycling/reuse of hazardous materials.
 - Sending waste off-site for recycling/reuse.
 - Other activities (specify):

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.
- The company does not generate enough waste to consider P2.

x. ~~Other reason given (specify): technical difficulties with ldr requirements~~

2. Does the company plan to do P2 activities in the future? Yes No N/A RMK#

3. Would the company be interested in receiving additional information from Ohio EPA about P2? Yes No N/A RMK#

4. Did you give the company information about P2 during the inspection? Yes No N/A RMK#

5. Would the company like a P2 assessment? Yes No 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 Pollution Prevention Assessments for Hazardous Waste Generators 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 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 N/A ___ RMK# ___
- 3. Have any provisions of the permit been identified as invalid? [PC A.4.] Yes ___ No 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 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 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 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 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 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:
- a. Ineffective management practices? Yes No N/A RMK#
- b. Inadequate funding? Yes No N/A RMK#
- c. Inadequate operator staffing and training? Yes No N/A RMK#
- d. Where appropriate, inadequate laboratory and process controls, including inappropriate quality assurance/quality control procedures? Yes No N/A 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 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)]
- 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 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 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 No N/A RMK#
- b. Name, address, and telephone number of the facility? [PC A.20.(b)(ii)]
 Yes No N/A RMK#

- c. Date, time, and time of incident? [PC A.20.(b)(iii)] Yes No N/A RMK# _____
- d. Name and quantity of material(s) involved? [PC A.20.(b)(iv)] Yes No N/A RMK# _____
- e. The extent of injuries, if any? [PC A.20.(b)(v)] Yes No N/A 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 No N/A RMK# _____
- g. Estimated quantity and disposition of recovered material that resulted from the incident? [PC A.20.(b)(vii)] Yes 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 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 RMK# _____
- b. The period(s) of noncompliance (including exact dates and times)? [PC A.21.(b)] Yes No N/A RMK# _____
- c. Whether the noncompliance has been corrected? [PC A.21.(b)]. Yes No N/A RMK# _____
- d. If no, then the anticipated time noncompliance is expected to continue? [PC A.21.(b)] Yes No N/A 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 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:
- 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 N/A RMK# _____

b. Do the reports provided contain the information set forth in Condition A.20? [PC A.22.]

Yes ___ No N/A RMK# ___

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 ___ N/A RMK# ___

a. Has the Permittee provided the director with advance notice of such changes? [PC A.17.]

Yes ___ No N/A 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 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 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 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 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 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 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 than 14 days following each scheduled date? [PC A.19.] Yes 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 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 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 No N/A RMK#
- a. Has the Permittee promptly submitted such facts, information, or corrected information to the director? [PC A.24.] Yes No N/A RMK#
19. Is the Permittee planning any physical alterations or additions to the permitted facility? If so, then: Yes No N/A RMK# 4
- a. Has the Permittee given notice to the director of such alterations/additions as soon as possible? [PC A.15.] Yes No N/A RMK#
- b. Have such changes been made in accordance with OAC Rule 3745-50-51? [PC A.15.] Yes 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 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 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 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 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 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 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 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 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 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 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 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 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 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 No N/A RMK# _____
- j. All other documents required by PC A.12. and PC F.5.
[PC A.28.(a)(x)] Yes 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 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 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 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 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 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 No N/A RMK# _____
- b. Individual(s) who performed the sampling or measurement? [PC A.12.(b)(ii)] Yes No N/A RMK# _____
- c. Date(s) analyses were performed? [PC A.12.(b)(iii)] Yes No N/A RMK# _____
- d. Individual(s) who performed the analyses?
[PC A.12.(b)(iv)] Yes No N/A RMK# _____

e. Analytical technique(s) or method(s) used?
[PC A.12.(b)(v)]

Yes No N/A ___ RMK# ___

f. Results of such analyses, including detection limits?
[PC A.12.(b)(vi)]

Yes 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 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 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 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 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 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 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 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 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 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 No N/A RMK#

i. Was the copy of the liability mechanism documentation submitted to the director in accordance with OAC Rules 3745-55-47? [PC A.27.(b)(iii)]

Yes 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 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 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 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 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 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 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 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 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 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 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 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 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 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 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 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 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 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 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 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 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 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 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 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 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 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 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:
- 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 No N/A RMK#
- b. Have any significant discrepancies been noted during the fingerprint analysis? If yes, then:
- i. Did the Permittee notify the generator? [PC B.3.(e)] Yes 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 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 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 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 No N/A ___RMK#___
18. Does the Permittee fingerprint at least every 10th bulk load received by the facility? [PC B.3.(f)] Yes 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 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 No N/A ___RMK#___
- b. One sample per 25 tons of waste from each Hopper railroad car? [Condition B.3.(f)(ii)] Yes 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 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 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 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 No N/A RMK# _____
22. Are all drums opened and inspected for free liquids prior to disposal? [PC B.3.(g)] Yes 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 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 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 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:
- a. Did the Permittee notify Ohio EPA of these findings? [PC B.3.(h)(iii)]. Yes 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 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 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 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 No N/A ___RMK#___

Testing Frequency And Procedures For K061 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 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 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 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 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 No N/A RMK# _____
34. Once "initial qualification" for a mix design has been achieved, did 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 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 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 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 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 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 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 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 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 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 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 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 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 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 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 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 No N/A RMK#
46. Has the Permittee provided a fence that surrounds the facility? [PC B.4.(c)] Yes No N/A RMK#
47. Has a new or replacement fence been installed after the effective date of the permit? If yes, then: Yes 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 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 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 No N/A RMK# 13
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 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 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 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 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 No N/A RMK# 14
55. Does the Permittee ensure that items that are not inspected are marked with "NI" on the checklist? [PC B.5.(a)] Yes No N/A RMK# 15
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 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 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 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 No N/A RMK# _____
60. Does the Permittee check service records of all scale equipment? [PC B.5.(c)(iii)] Yes No N/A RMK# _____
61. Does the Permittee perform testing and verification of the scales on a semi-annual basis or required by the equipment manufacturer? [PC B.5.(c)(iii)] Yes 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 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 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 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 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 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 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 No N/A RMK# _____
- b. Does the inspection include an assessment of the integrity of the pad and curbing? [PC B.5.(e)] Yes 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 _____ No N/A RMK# 16
69. Does the Permittee inspect once each operating day, overflow control equipment, monitoring equipment, drainage system, and tank level indicators? [PC B.5.(f)(ii)] Yes 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 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 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 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.(f)(vi)] Yes 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 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 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 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 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 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 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 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 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 No N/A RMK# _____
83. During construction, did the Permittee inspect and test earthen and synthetic liner components? [PC B.5.(h)(ii)] Yes No N/A RMK# _____
84. Have all aspects of liner construction been inspected for conformance with construction specification? [PC B.5.(h)(ii)] Yes 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 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 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 No N/A RMK# _____

- a. Were pockets of run-on water or exposed containers observed? If yes, then: Yes ___ No N/A ___ RMK# ___
- b. Were these observations noted on the inspection checklist? [PC B.5.(h)(v)] Yes ___ 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 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 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 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 ___ No N/A ___ RMK# 17
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 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 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 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 No N/A RMK# _____
96. Does the Permittee inspect the run-on water diversion or collection facilities for overflow, integrity of containment devices, general conditions, and the presence of leaks? [PC B.5.(j)(ii)] Yes 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 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 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 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 No N/A RMK# _____

PERSONNEL TRAINING REQUIREMENTS

101. Has the Permittee conducted personnel training, as required by OAC Rule 3745-54-16 and contained at least the elements set forth in Section H of the Permit application? [PC B.6.(a)] If yes, then: Yes 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 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 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 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 N/A RMK# _____

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 No N/A RMK# _____

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

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

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

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

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

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

116. Are ignitable and reactive wastes separated and protected from sources of ignition or reaction? [PC B.7.(d)]

Yes 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 No N/A RMK# _____

118. Are appropriate signs posted wherever ignitable, reactive, or incompatible wastes are managed?
[PC B.7.(d)]

Yes 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 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 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 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 No N/A ___ RMK# ___
 - d. Damage structural integrity of the device or the facility? [PC B.7.(f)(iv)] Yes No N/A ___ RMK# ___
 - e. Through other like means, threatens human health and the environment? [PC B.7.(f)(v)] Yes 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 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 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 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 N/A ___ RMK# 18
124. Does the Permittee maintain in each building an accessible, manual audible alarm warning system? [PC B.9.(a)(ii)] Yes 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 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 No N/A ___RMK#___
- a. Has the vehicle been equipped with spill control and first aid materials? [PC B.9.(a)(iii)] Yes 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 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 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 No N/A ___RMK#___
130. Does the Permittee maintain three fire hydrants connected to a public water main at adequate volumes and pressures or constructed and maintained a fire protection system dictated by NFPA guidelines? [PC B.9.(a)(vi)] Yes 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 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 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 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 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 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 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 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 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 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.10.(a)] Yes 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.10.(b)] Yes 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 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 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 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 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 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 RMK# _____

IMPLEMENTATION OF CONTINGENCY PLAN

146. Has there been a fire, explosion, or release of hazardous waste/constituents, or has another emergency situation since the date of the last CEI inspection? [PC B.14.] If so, then: Yes No N/A RMK# _____
- a. Did the Permittee immediately implement the approved contingency plan? [PC B.14.] Yes 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 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 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# 19

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:

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 No N/A RMK# _____
- iv. The percent available free lime in the raw waste? [PC B.22.(a)(iii)] Yes 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 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 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 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 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 No N/A RMK# _____
- ii. Individual(s) who performed the sampling measurements? [PC B.22.(b)(ii)(b)] Yes No N/A RMK# _____
- iii. Analytical technique(s) or method(s) used? [PC B.22.(b)(ii)(c)] Yes No N/A RMK# _____
- iv. Results of such analysis? [PC B.22.(b)(ii)(d)] Yes No N/A RMK# _____
- v. Description of waste analysis discrepancies? [PC B.22.(b)(ii)(e)] Yes 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 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 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 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 No N/A RMK# _____
 - iii. Inspection reports and log forms including any remedial action? [PC B.22.(d)(iii)] Yes No N/A RMK# _____
 - iv. Detailed reports of incidents requiring implementation of the Contingency Plan? [PC B.22.(d)(iv)] Yes No N/A RMK# _____
 - v. Documentation of post-closure personnel training of employees or contractors? [PC B.22.(d)(v)] Yes No N/A RMK# _____
 - vi. Certification of post-closure and notice in deed? [PC B.22.(d)(vi)] Yes 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 No N/A RMK# _____
 - ii. Certificate of insurance? [PC B.22.(e)(ii)] Yes No N/A RMK# _____
- h. Records of landfill and SCB leak detection/collection systems? [PC B.22.(f)] Yes 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 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 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 No N/A ___RMK#___
- ii. Tank and containment coating certification? [PC B.22.(i)(ii)] Yes No N/A ___RMK#___
- iii. Proper installation? [PC B.22.(i)(iii)] Yes No N/A ___RMK#___
- iv. "As-built" drawings for tank foundation and containment areas? [PC B.22.(i)(iv)] Yes No N/A ___RMK#___
- I. 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 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 No N/A ___RMK#___
 - iii. Corrective or remedial work reports, including sand zone replacement? [PC B.22.(j)(ii)] Yes No N/A ___RMK#___
 - iv. Manufacturer's weak seam evaluation reports? [PC B.22.(j)(iii)] Yes 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 No N/A ___RMK#___
 - vi. Geologic maps of cell excavations and associated soil gradation analyses? [PC B.22.(j)(v)] Yes 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 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 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 No N/A ___RMK#___

- ii. Soil sample gradation analyses and permeability test results? [PC B.22.(k)(ii)] Yes No N/A RMK# _____
- iii. Well completion reports? [PC B.22.(k)(iii)] Yes No N/A RMK# _____
- iv. Sampling logbook? [PC B.22.(k)(iv)] Yes No N/A RMK# _____
- v. Various ground water flow and direction reports? [PC B.22.(k)(v)] Yes No N/A RMK# _____
- vi. Compliance monitoring soil vapor survey data? [PC B.22.(k)(vi)] Yes No N/A RMK# _____
- vii. Interim information reports and final source determination reports? [PC B.22.(k)(vii)] Yes No N/A RMK# _____
- viii. Corrective action feasibility plans? [PC B.22.(k)(viii)] Yes No N/A RMK# _____
- ix. Variance applications? [PC B.22.(k)(ix)] Yes No N/A RMK# _____
- x. Sample custody forms? [PC B.22.(k)(x)] Yes No N/A RMK# _____
- xi. Ground water analysis and QA/QC reports? [PC B.22.(k)(xi)] Yes No N/A RMK# _____
- xii. Background concentration calculations? [PC B.22.(k)(xii)] Yes 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 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 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 No N/A RMK# 20

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 No N/A RMK# _____

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 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 No N/A RMK# 21
- 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 RMK# 22

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 No N/A RMK# _____
- 163. Does the Permittee keep the written notice in above question as part of the operating record? [PC B.2.(b)] Yes No N/A RMK# _____
- 164. Has the Permittee attempted to reconcile all significant discrepancies discovered in waste manifests? [PC B.24.(b)] Yes 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 RMK# 23
- 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:
 - 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 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 N/A RMK# 24

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 No N/A RMK# 25
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 No N/A RMK# 26
169. Has the Permittee amended the approved closure plan? If so, then: Yes No N/A RMK#
- a. Was the plan amended in accordance with OAC Rule 3745-55-12(C)? [PC B.28.] Yes 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 RMK# 27
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 RMK# 27

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 RMK# 27

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 RMK# 27
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 RMK# 27

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 RMK# 27

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 RMK# 27

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 No N/A ___ RMK# 28
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 No N/A ___ RMK# 28
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 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 RMK# 28

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 RMK# 28
- 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 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 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 RMK# 28

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 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 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 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 No N/A ___ RMK# ___

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

187. Has the Permittee demonstrated continuous compliance with OAC Rule 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 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 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 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 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 No N/A RMK#
190. Are the closure and post-closure trust funds:
- a. Irrevocable? [PC B.37.(f)] Yes No N/A RMK#
- b. Worded in such a manner as to cause the funds to be tax exempt? [PC B.37.(f)] Yes No N/A RMK#
191. Has the Permittee relinquished its rights to any excess monies in the funds? [PC B.37.(f)] Yes 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 RMK# 28
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 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 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 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 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 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 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 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 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 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 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 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 No N/A ___ RMK# 29
- 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 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 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 No N/A ___RMK# 29___
11. If lab-packs are generated, are they handled in compliance with applicable storage requirements? [PC C.6.(b)] Yes 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 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 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 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 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 than two pallets wide? [PC C.6.(f)] Yes No N/A ___RMK#___
17. Does the Permittee ensure that pallets are stacked no more than two layers high? [PC C.6.(f)] Yes 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 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 N/A ___RMK#___
- b. The date received into storage bay? [PC C.6.(h)(ii)] Yes No N/A ___RMK#___
- c. Permittee load number and/or container sequence number(for on-site generated waste)?[PC C.6.(h)(iii)] Yes No N/A ___RMK#___

d. Generator name? [PC C.6.(h)(iv)]

Yes No N/A ___ RMK# ___

e. Waste Stream Identification Number (WSID)
[PC C.6.(h)(v)]

Yes No N/A ___ RMK# ___

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 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 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 No N/A ___ RMK# ___

23. Are the containers elevated or otherwise protected from contact with accumulated liquids? If no, then:

Yes ___ No 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 No N/A ___ RMK# ___

24. Does the Permittee prevent run-on into the containment systems? [PC C.7.(d)]

Yes 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 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 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 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 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 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 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 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 N/A RMK# _____

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:
- a. Is the inspection schedule designed to detect for leaking containers, deteriorating containers and/or containment systems? [PC C.9.(a)] Yes 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 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 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 No N/A RMK# 29
36. Are all railroad cars inspected by trained personnel prior to entering and/or exiting the facility? [PC C.9.(d)] Yes No N/A RMK# 30

RECORDKEEPING

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

b. Waste type and description? [PC C.10.(c)(ii)]

Yes No N/A RMK# _____

c. The date received into storage area? [PC C.10.(c)(iii)]

Yes No N/A RMK# _____

d. Location? [PC C.10.(c)(iv)]

Yes No N/A RMK# _____

e. Date removed from the storage area? [PC C.10.(c)(v)]

Yes No N/A RMK# _____

f. Permittee load number and/or container sequence number? [PC C.10.(c)(vi)]

Yes No N/A RMK# _____

g. Generator name? [PC C.10.(c)(vii)]

Yes No N/A RMK# _____

h. Waste Stream Identification Number? [PC C.10.(c)(viii)]

Yes 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 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 No N/A RMK# _____

42. Has the Permittee inadvertently received ignitable, flammable, or combustible liquid waste? [PC C.11.(d)] If yes, was the waste stored as follows:

Yes No N/A RMK# _____

a. Class I flammable liquids only in metal containers? [PC C.11.(d)(I)]

Yes No N/A RMK# _____

b. Class II and Class III combustible liquids only in metal or polyethylene containers? [PC C.11.(d)(i)]

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

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 RMK# ___

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 RMK# ___

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

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

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

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

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

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

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

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 RMK# 31

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 No N/A RMK#
2. Has the Permittee treated any hazardous waste in a tank? [PC D.2.(a)] Yes No 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 RMK#
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 RMK# 32
 - b. A conservation breather vent? Yes No N/A RMK#
 - c. A man-way? Yes No N/A RMK#
 - d. A separate fill/drain line? Yes No N/A RMK#
 - e. A plug or ball valve with resistant seal, or equivalent? Yes No N/A 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 RMK# 33
6. Are tanks handling ignitable wastes grounded and equipped with flame arresters explosion-proof controls? [PC D.3.(b)(i)] Yes No N/A RMK# 33
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 RMK# 33

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# 32

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 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 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 give area and precipitation from a 25-year/24-hour storm? [PC D.4.(e)] Yes 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 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 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 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 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 ___ No N/A ___ RMK# 34

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 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 No N/A RMK# _____
- b. The tanks are not used for mixing non-compatible wastes? [PC D.5.(b)(i)] Yes 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 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 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 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 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 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 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 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 No N/A RMK# _____
23. Does the Permittee inspect the overfill controls in accordance with the permit application? [PC D.6.(b)] Yes 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 No N/A ___RMK#___
- b. Data gathered from monitoring and leak detection equipment to ensure appropriate operation? [PC D.6.(c)(ii)] Yes 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 No N/A ___RMK#___
25. Is compliance with PC D.6. documented in the operating record? [PC D.6.(d)] Yes 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 No N/A ___RMK#___
- b. The EPA waste code number of the waste material transferred? [Condition D.6.(e)(ii)] Yes No N/A ___RMK#_33
- 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 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 No N/A ___RMK#___
- e. The level control devices/equipment to ensure that they are operating properly? [PC D.6.(e)(v)] Yes 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 No N/A ___RMK#_35

RESPONSE TO LEAKS AND SPILLS

28. Have there been any spill/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 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 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 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 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 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 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 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 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 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 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 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 Rule 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 RMK# ___

RECORDKEEPING AND REPORTING

31. Did the Permittee report to the director of 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 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 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 RMK# ___
- b. Characteristics of the surrounding soil? [PC D.8.(b)(ii)] Yes ___ No N/A 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 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 down gradient drinking water, surface water, and populated areas? [PC D.8.(b)(iv)]

Yes ___ No N/A RMK# ___

e. Description of response actions taken or planned? [PC D.8.(b)(v)]

Yes ___ No N/A 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 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 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 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 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 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 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 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 RMK# ___

b. Was the tank solely used for emergencies? [PC D.10.(a)(ii)]

Yes ___ No N/A 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 RMK# ___

d. Was documentation for compliance with this condition placed in the operating record?
[PC D.10.(a)(iv)]

Yes ___ No N/A 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 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 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 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 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 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 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 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 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:
- a. Waste code designation and analytical data showing its constituents (quantitatively)? [PC F.2.(b)(i)] Yes 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 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 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 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 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 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 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 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 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 No N/A RMK# _____
- b. Physical contact with wastes to which they are exposed? Yes No N/A RMK# _____
- c. Climatic conditions? Yes No N/A RMK# _____

- d. Stresses of daily operation, including movement of heavy equipment and contact of the equipment with the containment walls? Yes 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 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 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)] If yes, then: Yes No N/A RMK# _____
- a. Do the doors and windows provide an effective barrier against fugitive dust emissions? [PC F.4.(e)(i)] Yes 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 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 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 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 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 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 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 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 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 No N/A RMK# _____

21. Is the leak detection system constructed to meet the following designed specifications? [PC F.4.(k)]

a. A bottom slope of one percent or more? Yes No N/A RMK# _____

b. Granular drainage material with a hydraulic conductivity of 1×10^{-2} cm/sec or more? Yes No N/A RMK# _____

c. Granular drainage material with a thickness of 12 inches (30.5 cm) or more? Yes No N/A RMK# _____

d. A constructed or synthetic drainage layer with transmissivity of 3×10^{-5} m²/sec or more? Yes 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 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 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 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 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 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 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 No N/A RMK# _____

- b. Are performance evaluations conducted on a yearly basis during the operating life of the SCB?
- c. Are vents and ducts inspected not less than annually?
- d. Are records of these inspections maintained on site?

Yes No N/A RMK# _____

Yes No N/A RMK# _____

Yes 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 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 N/A RMK# _____

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 N/A RMK# _____

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 N/A RMK# _____

e. Does the Permittee inspect the containment pads around the SCB by the end of each days use and remove all tracked or fallen waste at the time of the inspection? [PC F.5.(a)(iii)(a)]

Yes No N/A RMK# _____

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 N/A RMK# _____

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 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 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 No N/A RMK# _____
- i. Is the split screen inspected periodically and repaired or replaced as needed? [PC F.5.(d)(ii)] Yes No N/A RMK# _____
- j. Does the Permittee apply a condition/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 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 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 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 No N/A RMK# _____
32. Has the Permittee unloaded more than 24 pneumatic tank trucks per day? [PC F.5.(d)] Yes No 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 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 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 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 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 No N/A RMK# _____

38. Is all water removed from the run-off collection system treated as potentially contaminated? [PC F.5.(f)] Yes 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 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 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 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 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 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 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 appropriate active ingredient? [PC F.5.(g)] Yes 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 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 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 No N/A RMK#

44. After each shipment of hazardous waste is received, and has been placed 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 No N/A RMK#

b. Date waste was received into the storage area? [PC F.5.(k)(ii)] Yes No N/A RMK#

c. ESOI load number and/or container sequence number (for on-site generated waste)? [PC F.5.(k)(iii)] Yes No N/A RMK#

d. Generator name? [PC F.5.(k)(iv)] Yes No N/A RMK#

e. Waste Stream Identification Number? [PC F.5.(k)(v)] Yes 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 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 No N/A RMK# 36

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 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 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 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 No N/A RMK#

50. After each shipment of hazardous waste is received, and has been placed 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 No N/A RMK#

b. Waste type and description? [PC F.8.(b)(ii)]

Yes No N/A RMK#

c. Date received into storage area? [PC F.8.(b)(iii)]

Yes No N/A RMK#

d. Location (by storage area)? [PC F.8.(b)(iv)]

Yes No N/A RMK#

e. Date removed from storage area? [PC F.8.(b)(v)]

Yes No N/A RMK#

f. ESOI load number and/or container sequence number? [PC F.8.(b)(vi)]

Yes No N/A RMK#

g. Generator name? [PC F.8.(b)(vii)]

Yes No N/A RMK#

h. Waste Stream Identification Number (WSID)?
[PC F.8.(b)(viii)]

Yes 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 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 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 No N/A RMK#

54. Does the Permittee ensure that it does not perform encapsulation technology on waste that the Permittee knows, or reasonable 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 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 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 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 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 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 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 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 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 RMK# 37
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 RMK# 37

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 RMK# 37

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 RMK# 37

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 RMK# 38

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 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 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 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, a listing of the various analytical methods utilized to evaluate the constituents listed in Table G-1 below? [PC G.2.] Yes 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 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 take a confirmation sample within 30 days of receipt of the original results? [PC G.3.(a)(i)] Yes No N/A 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 RMK# _____
6. Does the Permittee keep liquid levels in the dewatering trenches below the bottom of the adjacent waterline? [PC G.3.(b)] Yes No N/A RMK# 39

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 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 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 No N/A RMK# 40

b. The monitoring trench cap for erosion and/or damage? [PC G.4.(a)(ii)]

Yes No N/A RMK# 40

c. The collection sumps for damage? [PC G.4.(a)(iii)]

Yes No N/A RMK# 40

d. The City of Toledo easement for evidence of leakage from the waterlines? [PC G.4.(a)(iv)]

Yes No N/A RMK# 40

e. The presence of liquid in the trenches? [PC G.4.(a)(v)]

Yes No N/A RMK# 40

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 observed during the weekly inspections and document them on the inspection form, and make necessary repairs within 30 days? [PC G.4.(b)]

Yes No N/A 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 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 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 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 No N/A RMK# 28

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 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 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 No N/A RMK# 41

5. Has the Permittee continue to operate the leachate collection and removal system until leachate is no longer detected? [PC I.2.(d)(ii)] Yes No N/A RMK# 42

6. Are existing leachate systems operational and in good repair? [PC I.2.(d)(ii)] Yes No N/A RMK#

7. Is the leachate system inspected monthly and repaired if required? [PC I.2.(d)(ii)] Yes 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 TSD? [PC I.2.(d)(ii)] Yes 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 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 No N/A RMK#

11. Are erosion control structures maintained during post-closure care? [PC 1.2.(d)(iii)(a)] Yes No N/A ___ RMK# ___
- a. Is erosion damage repaired and corrected as it occurs? [PC 1.2.(d)(iii)(a)] Yes No N/A ___ RMK# ___
12. Does the Permittee inspect the facility monthly, or after every major rainfall for erosion or pooling of water? [PC 1.2.(d)(iii)(b)] Yes No N/A ___ RMK# ___
- a. When found, is erosion or pooled water corrected? [PC 1.2.(d)(iii)(b)] Yes 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 1.2.(d)(iii)(c)] Yes No N/A ___ RMK# ___
14. Are all surveyed benchmarks protected and maintained? [PC 1.2.(d)(iv)] Yes No N/A ___ RMK# ___

GENERAL FACILITY CARE

15. Does the Permittee perform grass cutting and shrub care as needed (at least annually) [PC 1.2.(d)(v)(a)] Yes No N/A ___ RMK# 43
- a. Does the Permittee remove damaged or dead vegetation and replace with equivalent vegetation? [PC 1.2.(d)(v)(a)] Yes No N/A ___ RMK# 44
- b. Does the Permittee prohibit the growth of trees, shrubs, or other deep-rooted plants on closed waste units? [PC 1.2.(d)(v)(a)] Yes No N/A ___ RMK# 43
- c. Does the Permittee repair and re-vegetate areas damaged by erosion? [PC 1.2.(d)(v)(a)] Yes No N/A ___ RMK# ___
16. Has the Permittee removed trees, shrubs or other deep-rooted plants in the fall quarter of the year? [PC 1.2.(d)(v)(a)] Yes No N/A ___ RMK# 43
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 1.2.(d)(v)(a)] Yes 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 1.2.(d)(v)(a)] Yes No N/A ___ RMK# ___

19. Are buildings located on the site maintained in good repair? [PC 1.2.(d)(v)(b)] Yes No N/A RMK# _____
- a. Are all permits, fire codes, etc., maintained and complied with? [PC 1.2.(d)(v)(b)] Yes No N/A RMK# _____
20. Are existing roadways being maintained in good repair? [PC 1.2.(d)(v)(c)] Yes No N/A RMK# _____
21. Has the Permittee constructed any new roadways over any final cover areas? If so, Yes No N/A RMK# _____
- a. Did the Permittee receive approval from Ohio EPA for such construction? [PC 1.2.(d)(v)(c)] Yes No N/A RMK# _____
22. Are roadways maintained, as necessary, during inclement weather as to provide access to all areas? [PC 1.2.(d)(v)(c)] Yes No N/A RMK# _____
23. Are all existing drainage ditches being maintained and kept free of debris? [PC 1.2.(d)(v)(d)] Yes No N/A RMK# 45
24. Has the Permittee constructed drainage ditches on closed hazardous waste areas or altered the drainage flow? If so, Yes No N/A RMK# _____
- a. Did the Permittee obtain approval from Ohio EPA to make such changes? [PC 1.2.(d)(v)(d)] Yes No N/A RMK# _____
25. Are all utilities maintained operational? [PC 1.2.(d)(v)(e)] Yes 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 1.2.(d)(v)(e)] Yes No N/A RMK# _____
27. Does the Permittee prohibit underground utility construction in areas used previously for hazardous waste disposal? [PC 1.2.(d)(v)(e)] Yes 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 1.2.(e)(i)] Yes No N/A RMK# _____
- a. Is the fencing inspected monthly? [PC 1.2.(e)(i)] Yes No N/A RMK# _____
- b. Where necessary, is the fencing repaired or replaced if damage is found? [PC 1.2.(e)(i)] Yes No N/A RMK# _____
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 1.2.(e)(ii)] Yes No N/A RMK# 13

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 No N/A ___ RMK# ___
- a. Are gate locks inspected weekly? [PC I.2.(e)(iii)] Yes No N/A ___ RMK# ___
31. Are all ground water monitoring wells inspected weekly and equipped with locking caps? [PC I.2.(e)(iv)] Yes No N/A ___ RMK# ___
- a. Do ground water monitoring well caps remain locked except when sampled? [PC I.2.(e)(iv)] Yes ___ No N/A ___ RMK# 46
32. Has the Permittee noted any signs of unauthorized entry onto the premises? If so, then: Yes ___ No N/A ___ RMK# ___
- b. Did the Permittee immediately notify the director? [PC I.2.(e)(v)] Yes ___ No N/A 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 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 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 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 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 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 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 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 1.4.(b)(i)? Yes ___ No N/A RMK# 28

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 1.4.(b)(ii)] Yes ___ No N/A RMK# 28

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 1.4.(c)] Yes ___ No N/A RMK# 38

a. Did the removal of the hazardous wastes, specified above, satisfy the criteria of OAC Rule 3745-55-17(c)? [PC 1.4.(c)] Yes ___ No N/A 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 1.4.(d)? Yes ___ No N/A RMK# 28

FINANCIAL ASSURANCE

42. Has the Permittee maintained financial assurance during the post-closure period and complied with all applicable requirements? [PC 1.5.(a)] Yes 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 1.5.(b)] Yes No N/A ___ RMK# ___

44. Has the Permittee submitted itemized bills to the director to request reimbursement for post-closure care? [PC 1.5.(c)] Yes 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 N/A ___ RMK# ___

a. Was the request made in accordance with applicable requirements of OAC Rule 3745-50-40 through 3745-50-62? [PC 1.6.] Yes ___ No N/A 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 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 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 and unexpected event has occurred which has affected the post-closure plan? [PC I.6.]

Yes ___ No N/A 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 No N/A RMK# _____
2. Is the Permittee in compliance with the WPR approval process described in the record? [PC J.1.(b)] Yes 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 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 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 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 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 No N/A RMK# _____
- d. Shock sensitive wastes? [PC J.1.(d)(iv)] Yes No N/A RMK# _____
- e. Polychlorinated biphenyls regulated by the TSCA (GT/ET 50 ppm)? [PC J.1.(d)(v)] Yes No N/A RMK# _____
- f. Radioactive waste regulated by the Nuclear Regulatory Commission? [PC J.1.(d)(vi)] Yes No N/A RMK# _____
- g. Infectious wastes? [PC J.1.(d)(vii)] Yes No N/A RMK# _____
- h. Any waste in gaseous form? [PC J.1.(d)(viii)] Yes No N/A RMK# _____
- i. Any waste that is capable under standard temperature and pressure, of causing fire through friction, absorption of moisture or 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 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 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 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 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 No N/A ___RMK#___
- iii. Generate gases that adversely affect the permeability of the clay cap? [PC J.1.(d)(xii)(c)] Yes No N/A ___RMK#___
- m. Any waste exhibiting a flashpoint below 100 degrees F as detailed in Sections C-2(f)(11) through C-2(f)(13) of the permit application? [PC J.1.(d)(xiii)] Yes 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 No N/A ___RMK#___
6. Does the Permittee comply with all Land Disposal Restrictions as specified in OAC Chapter 3745-270? Yes 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 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 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 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 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 No N/A RMK#
- d. Has all earthfill material used been brought to proper water content? [PC J.2.(b)] Yes 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 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 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 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 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 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 No N/A RMK# 41
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 No N/A RMK# 41

14. Has any component of the landfill system or construction techniques to perform as required failed since the last CEI? If so: Yes No 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 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 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 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 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 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 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 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 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 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 3.6×10^{-8} cm/sec as determined using the slug tests in upper till and utilizing the Bouwer and Rice method)? [PC J.2.(n)] Yes No N/A RMK# _____

24. Does the above-grade design and construction of Cell M meet the specifications of PC J.2.(o)? Yes 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 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 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 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 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 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 No N/A ___ RMK# ___

i. Notify Ohio EPA on-site staff at least 3 days prior to the sampling event?

Yes 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 No N/A ___ RMK# ___

iii. Sample was transported following the standards outlined in ASTM D-4220, "Practices for Preserving and Transporting Soil Samples"?

Yes No N/A ___ RMK# ___

iv. Sample was allowed to cure for a minimum of one week but not more than 4 weeks?

Yes No N/A ___ RMK# ___

v. Sample was tested at an independent lab or by the Permittee in accordance with ASTM D-2166-00?

Yes 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 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 No N/A ___ RMK# ___

b. Is the reported shear strength less than 2000 psf during any month? If yes, then:

Yes ___ No 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 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 RMK# ___

c. Have 12 consecutive tests shown that the 2000 psf shear strength requirement has been met? If yes, then:

Yes No ___ N/A ___ RMK# 47

i. Was testing completed every 2 months?

Yes 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 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 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 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 No N/A ___ RMK# 48

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 No N/A ___ RMK# ___

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 No N/A ___ RMK# ___

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 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 No N/A ___ RMK# ___

a. If activation of the pump produces no liquids, then did the Permittee verify that the pump was inoperable before concluding that no liquid was present in the sub-cell sump? [PC J.3.(c)]

Yes 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 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 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 N/A RMK# _____

39. Are truck tires and frames decontaminated when coming into contact with hazardous waste? [PC J.4.(a)]

Yes 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 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 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 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 No N/A RMK# _____

44. Does the Permittee monitor the temperature of incoming bulk loads? [PC J.4.(d)].

Yes 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 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 complete the following items as part of the inspections? Yes ___ No N/A ___ RMK# 49
- 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 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 or run-on and run-off control system? Yes No N/A ___ RMK# ___
- ii. Proper functioning of wind dispersal control system? Yes No N/A ___ RMK# ___
- iii. The presence of leachate in and proper functioning of leachate collection and removal systems? Yes No N/A ___ RMK# ___
46. Does the Permittee document compliance with PC J.5. in the operating record? [PC J.5.(d)] Yes 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 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 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 3H, 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 No N/A ___ RMK# ___

50. Has the Permittee notified the director in accordance with the RAP and expeditiously repair the damage to the liner system upon leakage or an imminent hazard of leakage? [PC J.6.(b)] Yes ___ No N/A RMK# 50
51. Has the Permittee notified the Ohio EPA on-site inspector and expeditiously repair the damage upon discovery of a tear or puncture in the liner system? [PC J.6.(b)] Yes ___ No N/A 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 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 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 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 No N/A ___ RMK# ___
- c. The waste's identification cross referenced to the manifest document number? [PC J.7.(a)(iii)] Yes No N/A ___ RMK# ___
55. For each operating day, does the Permittee record in facility's operating record the following:
- a. Measurement of wind direction? [PC J.7.(b)(i)] Yes No N/A ___ RMK# ___
- b. Average and maximum wind speed? [PC J.7.(b)(ii)] Yes No N/A ___ RMK# ___
- c. Precipitation accumulated over the previous 24-hour period? [PC J.7.(b)(iii)] Yes 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 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 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 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 No N/A RMK#
- c. Daily leachate level readings before and after any leachate removal from the systems? [PC J.7.(d)(iii)] Yes No N/A RMK#
- d. Daily volumes of leachate removed from the systems? [PC J.7.(d)(iv)] Yes 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 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 RMK# 41
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 RMK# 41
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 RMK# 41

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:
- a. Are the procedures in the permit application followed? [PC J.9.] Yes No N/A RMK#
- b. Does the waste and landfill meet all applicable requirements of OAC Chapter 3745-270? [PC J.9.] Yes No N/A RMK#

c. Is compliance with OAC Rule 3745-54-17(B) achieved? [PC J.9.] Yes ___ No N/A 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 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 No N/A ___ RMK# ___

a. Are containers 90 percent or greater full? Yes 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 No ___ N/A ___ RMK# ___

i. Is the container very small, such as an ampule, Yes ___ No N/A 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 RMK# ___

iii. Is the container a lab pack as defined in OAC Rule 3745-57-16? Yes ___ No N/A 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 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 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 RMK# 51

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 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:
 - a. Did the Permittee inform Ohio EPA and document such denial and/or circumstances? [PC L.1.] Yes No N/A 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 No N/A RMK# _____

- 4. Does the Permittee follow the surface water management plan for the entire facility as found in Volume C, Appendix D.24 of the permit application? [PC L.3.] Yes No N/A RMK# _____

- 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 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 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 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 ___ No N/A ___ RMK# 52
2. Has the generator obtained a U.S. EPA identification number? [3745-52-12] Yes No N/A ___ RMK# ___
3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41] Yes No N/A ___ RMK# ___

WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? If so: Yes ___ No N/A ___ RMK# ___
- a. Has the generator notified U.S. EPA of export/import activity? [3745-52-53] Yes ___ No N/A RMK# ___
- b. Has the generator complied with special manifest requirements? [3745-52-54] Yes ___ No N/A 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 RMK# ___
- d. Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes ___ No N/A RMK# ___
- e. Are export related documents being maintained on-site? [3745-52-57] Yes ___ No N/A 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 N/A ___ RMK# ___
- a. Describe the unit(s) which the generator has closed. Yes ___ No N/A 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 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 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 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 No N/A RMK#

7. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] Yes No N/A RMK# 53

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 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 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 RMK#

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

b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position?

Yes No N/A ___ RMK# ___

c. Type and amount of both introductory and continuing training to be given to each person filling a position?

Yes No N/A ___ RMK# ___

d. Documentation that personnel have completed the training or job experience required under 3745-65-16 (A)(B) & (C)?

Yes 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 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 No N/A ___ RMK# ___

b. Emergency equipment?

Yes No N/A ___ RMK# ___

- c. Emergency systems? Yes 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 No N/A RMK# _____
- b. Key parameters for automatic waste feed cut-off systems? Yes No N/A RMK# _____
- c. Communication or alarm system? Yes No N/A RMK# _____
- d. Response procedures for fire/explosions? Yes No N/A RMK# _____
- e. Response to groundwater contamination incidents? Yes No N/A RMK# _____
- f. Shutdown procedures? Yes 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 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 No N/A RMK# _____
19. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes No N/A RMK# _____
20. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)] Yes 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 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 No N/A ___ RMK# ___
- b. Arrangements with emergency authorities? [3745-65-37] Yes No N/A ___ RMK# ___
- c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? Yes No N/A ___ RMK# ___
- d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? Yes No N/A ___ RMK# ___
- e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary? Yes 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 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 No N/A ___ RMK# ___
26. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] Yes No N/A ___ RMK# ___

EMERGENCY COORDINATOR

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

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

Yes ___ No N/A RMK# ___

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

Yes ___ No N/A RMK# ___

c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)?

Yes ___ No N/A RMK# ___

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 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 No N/A ___ RMK# ___

b. Emergency communication device?

Yes No N/A ___ RMK# ___

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

Yes No N/A ___ RMK# ___

d. Water of adequate volume/pressure?

Yes 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 No N/A ___ RMK# ___

32. Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33]

Yes 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 No N/A ___ RMK# ___

34. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]

Yes No N/A ___ RMK# ___

35. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout?
[3745-65-37(A)]

Yes 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 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 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 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 RMK# ___

b. The F006 waste is legitimately recycled through metals recovery. Yes ___ No N/A RMK# ___

c. No more than 20,000 kg. of F006 is accumulated on-site at any one time. Yes ___ No N/A RMK# ___

d. The facility complies with the applicable management standards for containers, tanks or containment buildings for LQGs. Yes ___ No N/A 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 No N/A ___ RMK# ___

b. Are under the control of the operator of the process generating the waste? Yes No N/A ___ RMK# ___

c. Do not exceed a total of 55 gallons of hazardous waste? Yes No N/A ___ RMK# ___

d. Do not exceed one quart of acutely hazardous waste at any one time? Yes No N/A ___ RMK# ___

e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? Yes 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 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 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 RMK# ___

USE AND MANAGEMENT OF CONTAINERS

40. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes No N/A ___ RMK# ___
41. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes 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 No N/A ___ RMK# ___
- b. In good condition? [3745-66-71] Yes No N/A ___ RMK# ___
- c. Compatible with wastes stored in them? [3745-66-72] Yes No N/A ___ RMK# ___
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes 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 No N/A ___ RMK# ___
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes ___ No N/A 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 RMK# 33
- 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 RMK# 33

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 No N/A RMK# _____
46. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes No N/A RMK# 54
47. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes No N/A 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 No N/A ___RMK#___
- a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)] Yes No N/A ___RMK#___
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes No N/A ___RMK#___
2. Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] Yes No N/A ___RMK#___
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes No N/A ___RMK#___
4. Does the generator generate a characteristic hazardous waste? If so: Yes No ___ N/A ___RMK#___
- a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes No N/A ___RMK#___

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

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so: Yes No N/A ___RMK#___
- a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes No N/A ___RMK#___

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

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

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 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 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 N/A RMK# _____

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

a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment. [3745-270-05] Yes _____ No N/A 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 N/A RMK# _____

a. The facility can land dispose of the waste. [3745-270-06] Yes _____ No N/A RMK# _____

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? If so: Yes _____ No N/A RMK# _____

a. Has the facility complied with 3745-270-04? Yes _____ No N/A RMK# _____

NOTIFICATION AND CERTIFICATION REQUIREMENTS

13. If a generator's waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1 of 3745-270-07? [3745-270-07(A)(2)] Yes No N/A RMK# _____

14. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1 of 3745-270-07? [3745-270-07(A)(3)] Yes No N/A RMK# _____
15. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1 of 3745-270-07? [3745-270-07(A)(4)] Yes No N/A RMK# _____
16. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1 of 3745-270-07? [3745-270-07(A)(9)] Yes No N/A RMK# _____
17. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so: Yes No N/A RMK# _____
- a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes No N/A RMK# _____

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

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

GENERATORS TREATING HAZARDOUS WASTE

19. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40? Yes 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 No N/A RMK# _____
- a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)] Yes No N/A RMK# _____
- b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] Yes No N/A RMK# _____
21. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] Yes No N/A RMK# _____

22. Has the generator followed the facility's WAP [3745-270-07(A)(5)? Yes No N/A RMK# _____

23. Have the treated wastes met the applicable treatment standards in 3745-270-40? Yes No N/A RMK# _____

NOTE: If the waste is a characteristic waste, which has been treated to render it non hazardous and subsequently sent to a solid waste landfill, proceed to 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 RMK# 55

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 RMK# 55

26. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following:

a. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes No N/A RMK# 55

b. A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)] Yes No N/A RMK# 55

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 N/A RMK# _____

a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)] Yes No N/A RMK# _____

b. Has the director been notified of such changes? [3745-270-09(D)] Yes No N/A RMK# _____

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

28. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: Yes No N/A RMK# _____

a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49 (C)] Yes No N/A RMK# _____

29. Does each notification/certification form completed, contain the information found in Table 1? [3745-270-07(A)(3)] Yes No N/A RMK# _____

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

HAZARDOUS DEBRIS

30. Does the material in question meet the definition of hazardous debris as defined in Rule 3745-270-02(A)(3)? Yes No N/A RMK# _____

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 N/A RMK# _____

32. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so: Yes No N/A RMK# _____

a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)] Yes No N/A RMK# _____

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

33. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so: Yes No N/A RMK# _____

a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)] Yes No N/A RMK# _____

34. Is the waste a PCB waste under 40 CFR Part 761? If so: Yes No N/A RMK# _____

a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)] Yes No N/A RMK# _____

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 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 RMK# _____

- a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)] Yes ___ No N/A RMK# ___
- b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)] Yes ___ No N/A RMK# ___
- c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)] Yes ___ No N/A RMK# ___
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 RMK# ___
- a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)] Yes ___ No N/A RMK# ___
- b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)] Yes ___ No N/A RMK# ___
- c. Technology used from Table 1? [3745-270-07(D)(1)(c)] Yes ___ No N/A RMK# ___
38. Has the above notification been sent to the director? [3745-270-07(D)(1)] Yes ___ No N/A 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 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 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 No N/A ___ RMK# ___
42. Are wastes or treatment residues being sent to another TSD to be further managed? If so: Yes No N/A ___ RMK# ___
- a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)] Yes No N/A ___ RMK# ___

43. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? If so: Yes ___ No N/A ___ RMK# ___
- a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)), excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)] Yes ___ No N/A RMK# ___
- b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4)[3745-270-07(B)(6)] Yes ___ No N/A RMK# ___
- c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)] Yes ___ No N/A RMK# ___
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 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 No N/A ___ RMK# ___
- b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49? Yes No N/A ___ RMK# ___
- c. The testing frequency specified in the facility's WAP and have they followed the protocol? Yes No N/A ___ RMK# ___

SMALL QUANTITY UNIVERSAL WASTE CHECKLIST

PROHIBITIONS

1. Did the SQUWH dispose of universal waste?
[3745-273-11(A)] Yes No 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 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 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 RMK# 59
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes No ___ N/A ___ RMK# 59
 - b. Mix battery types in one container? Yes ___ No N/A ___ RMK# ___
 - c. Discharge batteries to remove the electric charge? Yes ___ No N/A ___ RMK# ___
 - d. Regenerate used batteries? Yes No ___ N/A ___ RMK# ___
 - e. Disassemble them into individual batteries or cells? Yes ___ No N/A ___ RMK# ___
 - f. Remove batteries from consumer products? Yes ___ No N/A ___ RMK# ___
 - g. Remove the electrolyte from the battery? Yes ___ No N/A ___ RMK# ___
- If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] Yes ___ No N/A RMK# ___

- c. Cleaned up and properly managed the used oil and other materials? Yes No N/A RMK# _____
- d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes No N/A RMK# _____
10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: Yes No 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 RMK# _____
- b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour? Yes No N/A RMK# _____
- c. Are the combustion gases from heater vented to the ambient air? Yes No N/A 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 No N/A RMK# 58

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

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11] Yes No N/A RMK# 52

USED OIL INSPECTION CHECKLIST (Short Version)

PROHIBITIONS

- 1. Is used oil being managed in a surface impoundment or waste pile? If so: Yes ___ No 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 RMK# ___
- 2. Is used oil being used as a dust suppressant? Yes No N/A ___ RMK# ___
[3745-279-12(B)]
- 3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)? Yes ___ No N/A 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 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 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 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 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 N/A ___ RMK# ___
- 9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]
 - a. Stopped the release? Yes No N/A ___ RMK# ___
 - b. Contained the release? Yes No N/A ___ RMK# ___

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 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 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 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 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 RMK# ___
- b. If soils cannot be contaminated/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)]
- Yes ___ No N/A 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 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 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 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 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 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 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 RMK# ___
- d. Immediately conduct a visual inspection of the release? [3745-66-96(C)] Yes ___ No N/A RMK# ___
- e. Prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C)(1)] Yes ___ No N/A RMK# ___
- f. Properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)(2)] Yes ___ No N/A 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 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 RMK# ___
- i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)] Yes ___ No N/A 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 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.*

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 RMK# 33
- 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 RMK# ___
- c. The tank is used solely for emergencies?
[3745-66-98(A)(3)] Yes ___ No N/A 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 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 RMK# ___
- a. *If so*, have the requirements of 3745-65-17(B) been met? Yes ___ No N/A 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 RMK# 57
- a. Conducted waste analysis and trial treatment or storage tests? [3745-66-100(A)]; **OR** Yes ___ No N/A 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 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 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 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 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 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 No N/A ___ RMK# ___
- b. Above ground portion of tank (daily)? [3745-66-95(A)(2)]
- Yes No N/A ___ RMK# ___
- c. Data from leak detection equipment (daily)?
[3745-66-95(A)(3)]
- Yes 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 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 No N/A ___ RMK# ___
- f. Where applicable, all sources of impressed current at least bi-monthly? [3745-66-95(B)(2)]
- Yes 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 RMK# ___
- c. Proper backfilling? [3745-66-92(C)] Yes 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 No N/A ___ RMK# ___
- e. Proper support and protection of ancillary equipment? [3745-66-92(E)] Yes No N/A ~~___~~ RMK# ~~___~~
- f. Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)] Yes ___ No N/A 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 RMK# ___
- a. Design standards? [3745-66-91(B)(1)] Yes ___ No N/A RMK# ___
- b. The characteristics of hazardous waste(s) that have been or will be handled? [3745-66-91(B)(2)] Yes ___ No N/A RMK# ___
- c. Corrosion protection measures? [3745-66-91(B)(3)] Yes ___ No N/A RMK# ___
- d. The age of the tank system has been estimated or documented? [3745-66-91(B)(4)] Yes ___ No N/A RMK# ___
- e. A leak test has been conducted? (*For non-enterable underground tanks*) [3745-66-91(B)(5)(a)] Yes ___ No N/A RMK# ___
- f. A leak test or an internal inspection by qualified P.E. has been conducted? (*For other than non-enterable underground tanks and for ancillary equipment*) [3745-66-91(B)(5)(b)] Yes ___ No N/A RMK# ___
- g. Is assessment certified by an independent, registered P.E.? [3745-66-91(A)] Yes ___ No N/A 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 RMK# ___
- a. Have tests been certified by an independent, registered P.E.? Yes ___ No N/A 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 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 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?
- b. Consideration of the design standards of the system?
- c. Consideration of the hazardous characteristics of the waste(s)?
- d. An evaluation by a corrosion expert (*if the external system/components are metal*)?
- e. A determination of design and operational measures that will be needed to protect the tank system from potential damage (*for underground tank components*)?
- f. Design considerations to ensure that the tank foundations will maintain the load of a full tank?
- g. Design considerations for anchoring the unit to prevent floatation (*for tanks situated in a seismic fault zone or saturated zone*)?
- h. Design considerations to ensure that the tank system will withstand the effects of frost heave (*for underground tank systems*)?

Yes No N/A ___ RMK# ___

Yes ___ No N/A RMK# ___

Yes No N/A ___ RMK# ___

Yes 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)]

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 No 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 any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulated liquids? [3745-66-93(B)] Yes 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 No N/A RMK#
- b. Placed on a foundation or base capable of providing support? Yes 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 No N/A RMK#
- d. Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? Yes 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 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:
- a. Inspected daily? **AND**; Yes No N/A RMK#
- b. Is ancillary equipment one of the following:
- i. Above ground piping (exclusive of flanges, joints, valves and connections)? Yes No N/A RMK#
- ii. Welded flanges, welded joints and/or welded connections? Yes No N/A RMK#
- iii. Sealless or magnetic coupling pumps and/or sealless valves? Yes No N/A RMK#

- v. Are chemically resistant water stops in place at all joints? (*concrete liners only*) Yes ___ No N/A 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 RMK# ___
- b. **Vault System?** [3745-66-93(E)(2)(a) - (2)(f)] If so,
 - i. Is vault system designed to contain 100% of the capacity in the largest tank? Yes ___ No N/A RMK# ___
 - ii. Is 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 ___ No N/A RMK# ___
 - iii. Are chemically resistant water stops in place at all joints? Yes ___ No N/A RMK# ___
 - iv. Is there a compatible interior coating to prevent migration into the concrete? Yes ___ No N/A 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 RMK# ___
 - vi. Is vault system provided with an exterior moisture barrier? Yes ___ No N/A RMK# ___
- c. **Double-Walled Tank?** [3745-66-93(E)(3)(a) - (3)(c)] If so,
 - i. Is double-walled tank designed as an integral structure to contain any release from the inner tank? Yes No N/A ___ RMK# ___
 - ii. **If metal**, are the primary tank interior and outer shell exterior surfaces protected from corrosion? Yes ___ No N/A RMK# ___
 - iii. Is 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 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 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 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 No N/A RMK# 56
- i. Is liner designed or operated to contain 100% of the capacity of the largest tank? Yes No N/A RMK#
- ii. Is 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 No N/A RMK#
- iii. Is liner free of cracks and gaps? Yes No N/A RMK#
- iv. Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release? Yes No 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 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 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 RMK# ___

7. Are the battery(ies) of 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 N/A ___ RMK# 59

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 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 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 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 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 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 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 RMK# ___
15. If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)] Yes ___ No N/A 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 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 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 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 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 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 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 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 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 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 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 RMK# 60

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 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 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? Yes No N/A RMK# _____
[3745-273-15(A)] If not:
- 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 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: Yes No N/A RMK# _____
[3745-273-15(C)]
- 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 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 N/A RMK# _____
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes No N/A 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 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 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 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 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 RMK# ___

25. Is the material released characterized? [3745-273-17(B)]

Yes ___ No N/A 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 RMK# ___

OFF-SITE SHIPMENTS

NOTE: If a SQUWH self-transport 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 No N/A ___ RMK# 59

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 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 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 ___ RMK# ___
- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes ___ No ___ N/A ___ 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:
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes ___ No ___ N/A ___ 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 ___ 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 ___ 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 ___ RMK# ___

EXPORTS

34. Is waste being sent to a foreign destination? If so:
- 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 ___ 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 ___ 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 ___ 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. Ohio EPA has not observed and ESOI has not reported any incidents which would endanger human health or the environment since the date of the last CEI inspection.
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 29, 2006 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 is currently under review at Ohio EPA.
10. ESOI has not accepted F027 since the date of the last CEI inspection.
11. As of 11/30/06 ESOI had 7,017.14 tons of hazardous waste remaining to reach the allowable maximum.
12. Debris / Non-debris issues have been noted during the fingerprint analysis.
13. One sign on the fence near monitoring well H4s was observed upside down and with the wording facing into the interior of the facility.
14. "Safety & Fire Equipment Inspection Form MF-11 Frequency -Weekly" dated 07/04/06, inspection form is marked "Holiday" and left blank and without signature.
15. "City of Toledo Raw Waterline Security Agreement Weekly Inspection Form WL-100" dated 07/10/06 signed and dated but all questions of page 1 of 1 blank. "Daily Site Inspection Form M-F-02(a) Frequency - Daily" dated 07/06/06, signed and dated, page 2 of 2 blank. "Leachate Tank Storage Inspection Form MF-04(a) Frequency - Weekly & After Storms (2" in 8hrs)" dated 07/12/06, signed and dated but all questions on pages 1 and 2 of 2 blank. "Safety & Fire Equipment Inspection Form MF-11 Frequency -Weekly" dated 07/04/06, inspection form is marked "Holiday" and left blank. "Daily Site Inspection Form M-F-02(a) Frequency - Daily" dated 05/23/06 and signed by S A Jacob, questions 1)F), 1)G), 1)H), 2)A-D) left blank.

16. "Leachate Tank Storage Inspection Form MF-04-(a) Frequency – Weekly & After Storms (2" in 8hrs)" – No inspection recorded between 07/05/06 and 07/15/06. – 07/12/06 form signed and dated, but all questions blank.
17. "Safety & Fire Equipment Inspection Form MF-11 Frequency – Weekly" – No inspections between 06/27/06 and 07/11/06. 07/04/06 inspection form marked "Holiday" and left blank.
18. 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.
19. The contingency plan was last reviewed on March 16, 2006.
20. The contingency plan has not been implemented since the date of the last CEI inspection.
21. ESOI received waste from off-site generators under manifest #000287634 JJK, 000287635 JJK and 001188433JJK on October 3, 2006 which contained weight discrepancies of greater than 10%. ESOI failed to mark the manifest in the appropriate box to indicate a weight discrepancy but rather marked the manifest in the "Special Handling Instructions and Additional Information" box to indicate that the generators accepted ESOI's scale weight.
22. ESOI has not received any waste from a foreign source since the date of the last CEI inspection.
23. Per Ohio EPA inspection of incoming waste receipts since the last CEI inspection, ESOI has rectified all manifest discrepancies.
24. ESOI submitted their 2005 annual report on February 15, 2006.
25. Inactive portions of ESOI have been closed. Cell M, container storage areas, tank storage areas, the SCB and the LSTB remain operational.
26. Section I of the facility permit application has been submitted but remains under review by Ohio EPA.
27. Cell M remains active and is expected to be active until 2012.
28. 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.
29. During the site inspection conducted on Wednesday December 6, 2006, box 19924 holding waste 611270026 on area O (Cell M) was observed with a rust hole in the side of the box with the plastic liner visible. ESOI immediately took this box out of service.
30. ESOI recorded no inspections on "Rail Car Inspection Form- Inbound M-F-16(a) Frequency - Inbound Rail Car" or "Rail Car Inspection Form- Outbound M-F-16(b) Frequency - Outbound Rail Car" forms from July 4 through July 9, 2006. The "ESOI Load Detail Summary Report" indicates that the facility received four rail cars on July 5, 2006, five rail cars on July 6, 2006 and five rail cars on July 7, 2006. In addition, the "ESOI Load Detail Summary Reports" indicate that ESOI received waste by rail on October 9 (5 rail cars), October 10 (4 rail cars), October 12 (4 rail cars), October 16 (5 rail cars), October 17 (5 rail cars), November 6 (5 rail cars), November 7 (5 rail cars), November 9 (10 rail cars), November 13 (5 rail cars)

and November 29 (5 rail cars). "Rail Car Inspection Form- Inbound M-F-16(a) Frequency - Inbound Rail Car" Daily Rail Inbound and Rail Outbound inspection forms do not correspond to these records on these dates. The Rail inspection logs indicate that of the 4 rail shipments received on October 9, 2005, only one was recorded on the outbound rail dated October 11, 2006. ESOI has no record of the 4 rail shipments received on October 12, 2006 leaving the facility. In addition, there are no inspection logs for the inbound or outbound rail storage areas for the other dates mentioned above.

31. ESOI has not closed any container storage areas since the last CEI inspection.
32. ESOI has not constructed any tanks since the date of the last CEI inspection.
33. 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.
34. "Leachate Storage Building Tanks Inspection Form MF-03-(a) Frequency - Daily" - On 05/27/06, 05/28/06, 05/29/06 and 05/30/06 the inspection form notes "water in sump". However, the inspection form indicates that the sump was not pumped until 05/30/06.

On 09/03/06, 09/04/06 and 09/05/06 the inspection form notes "water in sump". However, the inspection form indicates that the sump was not pumped until 09/05/06. On 11/11/06, 11/12/06 and 11/13/06 the inspection form notes "water in sump". However, the inspection form indicates that the sump was not pumped until 11/13/06. In addition, several of ESOI's leachate storage building inspection forms indicate that an ESOI employee has noted rust and/ or corrosion on the secondary containment structure for tanks S-100, S-200, S-300 and S-400. ESOI has not noted if the rust is superficial or if it compromises the integrity of the secondary containment or if any remedial actions have taken place.

35. Tank S-100 was inspected internally on 04/24/06 and externally on 04/13/06. Tank S-200 was inspected internally on 04/14/06 and externally on 04/13/06. Tank S-300 was inspected internally on 04/07/06 and externally on 04/13/06. Tank S-400 was inspected internally on 03/31/06 and externally on 04/13/06. Ultrasonic testing was conducted on all four tanks on 04/13/06. The secondary containment was inspected for all four tanks on May 1, 2006. The secondary containment paint was inspected on July 3, 2006.
36. 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.
37. ESOI has not conducted macro-encapsulation since the date of the last CEI inspection.
38. 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.
39. 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. Ohio EPA recommends that ESOI indicate the invert elevation and the waterline trench liquid level on the inspection form. Gary Deutschman reiterated this request for ESOI to place the invert elevations on the inspection form during the exit interview for this inspection.

40. ESOI did not record any inspections of the City of Toledo Raw Waterline between July 3, 2006 and July 17, 2006. The "City of Toledo Raw Waterline Security Agreement Weekly Inspection Form WL-100" dated 07/10/06 is signed but remainder of the form is blank.
41. ESOI has not constructed a final cap on Cell M. However, ESOI has completed the construction of a cap on Phase 1 of Cell M with the exception of seeding for vegetation. ESOI anticipates seeding this area in the spring 2007. Burrow holes were observed on the closed cells by Ohio EPA on December 6 and 12, 2006. Ohio EPA observed one hole in the south side of Cell I and on the south side of Cell H. 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.
42. ESOI continues to remove leachate from Cells F,G, H, I and M.
43. ESOI mows and cuts grass and vegetative growth annually. Ohio EPA noted small shrubs on Cell G during this CEI inspection which ESOI cut the following day. Ohio EPA recommends that ESOI remove these shrubs from the cell cover system.
44. ESOI was notified of two areas of distressed and/or dead vegetation. One is located on the south east corner of the north sanitary landfill and the other is on the south east corner of the central sanitary landfill. ESOI indicated that these areas are being addressed through corrective action activities.
45. A storm water culverts around Cell M require frequent maintenance due in part to the lack of vegetation on the side slopes of the cell. ESOI must continue to maintain the surface water ditches and culverts as needed.
46. Ohio EPA observed the lock for monitoring well H4S sitting on top of the well casing for several days during the inspection.
47. ESOI has completed 12 consecutive months of waste strength testing on Cell M. All samples exceeded the 200 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.
48. ESOI has allowed the leachate to exceed one foot on the primary liner on several occasions. Ohio EPA is currently evaluating ESOI's compliance with this requirement.
49. ESOI recorded no inspections on the "Landfill Area Inspection Form MF-09(a) Frequency - Weekly & After Storms (2" in 8 hrs) from June 12, 2006 to June 22, 2006.
50. ESOI has not observed enough leachate generation from the secondary liner to implement the RAP for Cell M.
51. ESOI has not accepted **FOR, F020, F021, F022 F023, F026, AND F027** waste since the date of the last CEI inspection.

52. ESOI manages leachate in the leachate storage tanks as F039 hazardous waste and ships under the same waste code to an off-site disposal facility. The off-site disposal facility has noted a discrepancy on numerous occasions that the leachate also exhibits the D002 hazardous waste characteristic. ESOI indicated that the facility relies on the disposal facility to make the pH determination during the exit interview.
53. Manifest #000940559 from ESOI to EQ Detroit shipped on November 21, 2006 had no quantity in box 11. Manifest MI 9453376 from ESOI to EQ Detroit shipped on May 22, 2006 had no quantity in box 13.
54. ESOI does not transport hazardous waste in <110 gallon containers.
55. 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.
56. 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.
57. 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.
58. Used oil is transported off-site by DISC Environmental Services.
59. ESOI generates universal waste lead acid batteries from on-site equipment. These batteries are stored in a room in Building C. Used batteries are marked with the month and year that they are placed into the storage area. Used batteries are picked up by D&J Supply, 1929 Star Avenue, Toledo, Ohio, who sells ESOI replacement batteries.
60. Lamps generated by ESOI are treated in the SCB and disposed of on-site.