



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

Re: ESOI Otter Creek Road Facility  
OHD 045 243 706  
RCRA Hazardous Waste  
Lucas County  
**January 2009 CEI  
Notice of Violation**

April 24, 2009

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

Dear Mr. Humphrey:

From January 20 through January 23, 2009, Gary Deutschman, Mary Ann Miller and I inspected Envirosafe Services of Ohio, Inc.'s (ESOI's) hazardous waste treatment, storage and disposal facility (TSDF) located at 876 Otter Creek Road in Oregon, Ohio. ESOI was represented by Ms. Lisa Humphrey, Mr. Alan Perkins, Mr. Donald Steyer and you during various portions of this 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), 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.

During a Compliance Evaluation Inspection (CEI) exit interview on January 29, 2009, you were notified of a number of concerns that Ohio EPA identified during the CEI. Upon reviewing documents and considering comments ESOI submitted and made during the CEI and exit interview, Ohio EPA has determined ESOI is in violation of the following conditions of the facility's hazardous waste permit and/or Ohio's hazardous waste rules and laws:

1. **Permit Condition F.4(p) and OAC 3745-205-101(C)(1)**

Permit Condition F.4(p) states, "The Permittee must maintain a baghouse or an equivalent device on all Air Pollution Control Systems managing the Stabilization/Containment Building ventilation and on the dump hoods used for pneumatic unloading and truck unloading. Performance test results must be available on-site in the operating record. Performance evaluations must be conducted on a yearly basis during the operating life of the Stabilization/Containment Building. Vents and ducts must be inspected not less than annually. Records of these inspections must be maintained on-site for the life of the facility." (Emphasis added)

On January 20 and again on January 22, 2009, Ohio EPA requested ESOI to supply records demonstrating its compliance with Permit Condition F.4(p) and OAC Rule 3745-205-101(C)(1)(d). Specifically, Ohio EPA requested ESOI to provide Stabilization/Containment Building (SCB) Air Pollution Control (APC) annual performance test results and annual vent and duct inspections for the years 2006, 2007 and 2008.

On January 22, 2009, ESOI provided a portion of the requested records. ESOI provided documentation for the SCB APC performance tests conducted on December 21, 2006; December 24, 2007; and December 20, 2008. ESOI could not provide any records documenting that the required annual vent and duct inspections had been conducted.

During the CEI exit interview conducted on January 29, 2009, Don Steyer indicated that while he believed the vent and duct inspections had been conducted he did not believe that any record of those inspections had been maintained at the facility.

On February 3, 2009, Ohio EPA notified ESOI that it had until February 6, 2009, to provide the agency with records documenting any SCB vent and duct inspections [as described in Permit Condition F.4(p)] that ESOI had conducted. On February 4, 2009, Don Steyer provided Ohio EPA with eight (8) copies of Daily Checklist of Air Pollution Control Units (APC Unit Checklist version 5.0) from November 2006 to May 2008. Mr. Steyer indicated that notations made on these representative daily records documented that ESOI had cleaned APC screens on the APC ductwork inside the SCB but, those notations had not documented that ESOI had inspected the APC vents and ducts to determine if an accumulation had occurred along the ducts.

**2. Permit Condition A.28(a)(vi) and OAC Rule 3745-54-73(B)(5)**

Permit Condition A.28(a)(vi) requires the Permittee to maintain an operating record as required by OAC Rule 3745-54-73 and the terms and conditions of this permit. This operating record must include inspection records maintained at the facility for at least three years from the date of the inspection.

ESOI could not provide the requested records for the vent and duct inspections from 2006, 2007 or 2008 as required by Permit Condition F.4(p).

**3. Permit Condition B.5(b) and OAC Rule 3745-54-15(D)**

Permit Condition B.5(b) requires the Permittee to keep records of inspections as required by OAC Rule 3745-54-15(D), the terms and conditions of this permit and the permit application.

ESOI could not provide the requested records for the vent and duct inspections from 2006, 2007 or 2008 as required by Permit Condition F.4(p).

**To abate these violations, ESOI must:**

- 1. Create an inspection form that identifies all of the inspection ports/vents that ESOI inspects for the six APC units in the Stabilization/Containment Building Air Pollution Control Systems [as required by Permit Condition F.4(p)].**

2. **Provide documentation that the supervisors and staff responsible for completing and reviewing this new inspection form have received training on how to complete this form.**
3. **Submit a permit modification in accordance with OAC Rule 3745-50-51 to incorporate this inspection form into Section F of the Part B Permit Application.**

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

1. Appendix D.22 of the Permit Application describes the Response Action Plan (RAP) for the Containment Building.

A review of the Permittee's ESOI CBS Primary and Secondary Inspection Record, 2008 (January – December) during the June 2008 CEI, Ohio EPA observed that the Action Leakage Rate for CBS-1 was exceeded for multiple weeks/months at a time during January of 2008 and from the reporting week beginning on March 11, 2008, through the week ending on August 4, 2008. ESOI determined and Ohio EPA concurred that these ALR exceedances were due to factors external to the actual treatment and storage operations conducted within the Containment Building (e.g., storm water or groundwater infiltration following precipitation events).

As discussed during the June 2008 CEI exit interview, the RAP for the Containment Building did not anticipate multiple exceedances of an ALR that would require daily pumping for several weeks (>14 days) or months before returning the liquid volume to a level below the Indicator Leakage Rate (ILR). For situations where the Agency has concurred with ESOI that an ALR exceedance was due to factors external to the operations conducted within the containment building, Ohio EPA requests that ESOI notify the agency of all ALR exceedances that occur after the initial event that triggers the ALR response actions until the Permittee is able to return the liquid volume to a level below the ILR for that event. These notifications should follow the steps outlined in the modified ALR Response Actions (Section 6.2 of Appendix D.22 – pages D.22-18 and 19).

This area of concern was discussed with ESOI during the December 11, 2008, settlement meeting and will be addressed through resolution of the proposed orders.

In correspondence dated March 6, 2009, Ohio EPA proposed modifications to the language in Sections 6.1 and 6.2 of Appendix D.22 of ESOI's Part B Permit Application. As of the date of this letter, Ohio EPA has not received a Class 1 permit modification request from ESOI to update Appendix D.22.

2. Permit Condition L.3 and OAC Rule 3745-57-03(H) state that ESOI must follow the surface water management plan for the entire ESOI facility found in the approved Part B Application.

During the January 2009 CEI exit interview, Ohio EPA noted that it continues to observe the surface water drainage ditch and storm water culverts on the east side of Cell M (along sub-cells M4 and M6) filling with sediment. During rain events, surface water continues to pond in this ditch and sediment continues to build up around the culverts. The condition of the surface water drainage ditch and culverts along the east side of Cell M did not meet the specifications described in Appendix D.24 of ESOI's Part B Permit Application.

During the 2008 construction season, under the monitoring and examination of MSG, Inc., personnel, ESOI removed the ramp along the south side of Cell M, decreased the slope both above and below the bench, and made significant improvements to the drainage ditch along the south side and near the southeast corner of Cell M.

ESOI's failure to maintain the surface water drainage ditches as outlined in the approved Part B Permit Application was discussed during the December 11, 2008, settlement meeting. This area of concern will be addressed through resolution of the proposed orders.

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

3. Permit Condition B.4(c) requires the Permittee to provide a fence which surrounds the facility. New or replacement fence installed from the effective date of the permit must be at least a six-foot chain-link fence topped with three strands of barbed wire. Internal security to the active disposal cell(s) must be maintained within fences and/or gates.

OAC Rule 3745-54-14(B)(2)(a) requires ESOI to have an artificial or natural barrier (e.g., a fence in good repair or a fence combined with a cliff), which completely surrounds the active portion of the facility.

Ohio EPA has observed that several areas of the fence-line both north and south of York Street, as well as around SWMU #5, are not being maintained in good repair. In these areas vegetation has become so overgrown that it is weighing down the barbed wire (and in some cases the fence itself). This vegetation also prohibits Ohio EPA and ESOI personnel from inspecting the condition of the fence-line and gates, obstructs view of the signs (Danger – Unauthorized Personnel Keep Out) required by OAC Rule 3745-54-14(C), and portions of the fence have rusted through and/or become disconnected.

During the January 2009 CEI exit interview and on April 1, 2009, Ohio EPA provided ESOI with photographs of areas of the fence-line that need to be improved. At the exit interview ESOI committed to addressing these issues during 2009.

4. Permit Condition I.2(d)(v)(a) states that grass cutting must be performed by the Permittee as needed, but at least annually.

During the January 2009 CEI exit interview, Ohio EPA discussed the condition of the north side of Cell F with ESOI (photograph provided) as it appeared that this area had not been mowed during 2008. ESOI insisted that this area of Cell F had been cut at least once during 2008, but could not provide any records documenting the date(s). Ohio EPA noted that the height of the vegetative growth on the north side of Cell F made it extremely difficult for agency personnel and ESOI staff to determine the condition of

the cover system or to inspect for possible rodent damage. As stated during the June 2008 CEI, Ohio EPA has observed (with the exception of this area on Cell F during 2008) that ESOI mows grass and vegetative growth annually.

ESOI should mow the facility more frequently to ensure that the Post-Closure Inspections can be properly completed.

5. As noted during the June 2008 CEI, Ohio EPA again noted that correction fluid (e.g., Wite Out® or Liquid Paper®) was being used on some inspection forms. ESOI should refrain from using correction fluid on documents that are required to be maintained in the facility's operating record. Errors made on inspection records should be struck through with a single line and the corrected information should be entered nearby on the inspection forms.
6. Permit Condition J.2(s)(i) requires the Permittee to notify Ohio EPA on-site staff at least three (3) days prior to the sampling event. ESOI failed to do this for the November 2008 (ESOI scheduled sampling on a State holiday) and January 2009 (ESOI notified the on-site inspector the morning of the sampling event) Shelby Tube sampling events. During the January 2009 CEI exit interview ESOI committed to improving its notification process for Shelby Tube sampling.
7. OAC Rule 3745-273-14(A) states universal waste batteries (i.e., each battery), or a container in which the batteries are contained, must be labeled or marked clearly with any of the following phrases: "Universal Waste – Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)."

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

During the inspection conducted on January 20, 2009, Ohio EPA noted that ESOI has failed to label any of the lead acid batteries being accumulated in Building C (this was also noted during the December 2006 and May 2007 CEIs). Ohio EPA observed eight (8) batteries in the battery storage room in Building C. None of these batteries were being charged at the time of the inspection and none were labeled as universal waste.

During the exit interview ESOI indicated that all of these batteries are still in use and being charged. Batteries that are being charged should be labeled as such. Batteries that can no longer being charged should have an "Out of Service" date or "Accumulation Start" date on them and should be labeled as required under OAC Rule 3745-273-14(A).

8. OAC Rule 3745-279-22(C)(1) states containers (including drip pans and fill pipes) and aboveground tanks used to store used oil must be labeled or marked clearly with the words "Used Oil."
- During the inspection conducted on January 20, 2009, Ohio EPA observed the label on the reservoir tank in Building C was not clearly marked. ESOI should replace this label.
9. Permit Condition C.1(a)(ii) and Table C-2 identify and describe the storage capacity for the five storage areas located inside of the Stabilization/Containment Building.

During the January 2009 CEI, Ohio EPA observed waste in excess of the 50 cubic-yard-storage capacity present in Storage Area E. Ohio EPA requested that ESOI submit a permit modification to amend Permit Module C and Drawing D-2000L-G01. On March 12, 2009, Ohio EPA received PITS# 090309-1-1 (Modification 025) from ESOI which address this concern. Ohio EPA is currently reviewing this permit modification request.

10. Permit Condition C.6(d) requires that ESOI must conduct the loading and unloading of containers or drums (as described in Section D of ESOI's Part B Permit Application) at locations where secondary containment capable of minimizing the release of spilled material to the environment is provided.

Since the June 2008 CEI, Ohio EPA has observed ESOI unloading and loading lugger boxes near the M5 primary risers in a location that does not have secondary containment.

ESOI has stopped conducting this activity in this area and currently manages the loading and unloading of these lugger boxes in Storage Area K.

11. Permit Condition C.6(f) requires the Permittee to store containers on pallets if they are of a size and type that can be placed on pallets. During the January 2009 CEI, Ohio EPA observed 15 x 55-gallon steel drums in storage area C8 (Truck Dock Unloading Platform Area – See Drawing D-2000L-G01) that were not stored on pallets.

ESOI should take steps to ensure that these types of containers are placed on pallets when in storage.

12. During the January 2009 CEI exit interview, Ohio EPA provided ESOI with a photograph that showed significant wear on a hose ESOI was using to unload waste from its on-site vacuum tankers into the S-tanks in the Leachate Storage Tank Building (LSTB). Ohio EPA requested that ESOI remove this worn hose from use and replace it.

Ohio EPA has observed that ESOI has replaced this worn hose.

13. During the January 2009 CEI exit interview, Ohio EPA provided ESOI with photographs of an unlabeled and open 5-gallon plastic pail containing used rags, PPE and scrapings and a pile of used rags that Ohio EPA observed in the LSTB on January 21, 2009. ESOI explained that this waste was most likely generated either during the annual S-tank inspection [Permit Condition D.6(f)] between April and July 2008 or during the scraping and recoating of the S-tank secondary containment during September and October of 2008.

Following the exit interview, ESOI provided Material Safety Data Sheets (MSDS) for the high-performance industrial enamel topcoat used to recoat the secondary containment of the S-tanks and MSDSs for the two-part (A+B) cycloaliphatic amine epoxy used to recoat the inside of the S-tanks. These MSDSs indicate that the scrapings from these products would not appear to be hazardous waste. ESOI also believes that the most likely source for the generation of this waste was the scraping and coating of the S-tank secondary containment in September and October of 2008.

ESOI must take steps to better follow the requirements of OAC Chapter 3745-52 for its on-site generated waste.

Enclosed you will find a copy of the checklists that were completed during the inspection. Should you have any questions, please feel free to call me at (419)698-3130.

You can find copies of the rules and other information at <http://www.epa.state.oh.us/dhwm>. Ohio EPA also has helpful information about pollution prevention at <http://www.epa.state.oh.us/ocapp/ocapp.html>.

Sincerely,



Chris Maslo  
Environmental Specialist II  
Division of Hazardous Waste Management

/cs

Enclosure

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Fran Kovac, Legal, CO  
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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.

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## ACRONYMS

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

\* Regulation/Enforcement History Table

## General Process Information

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

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

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

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

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

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

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

U023 (1)	U024	U025	U026	U027	U028	U029
U030	U031	U032	U033 (1)	U034	U035	U036
U037	U038	U039	U041	U042	U043	U044
U045	U046	U047	U048	U049	U050	U051
U052	U053	U055	U056	U057	U058	U059
U060	U061	U062	U063	U064	U066	U067
U068	U069	U070	U071	U072	U073	U074
U075 (1)	U076	U077	U078	U079	U080	U081
U082	U083	U084	U085	U086	U087	U088
U089	U090	U091	U092	U093	U094	U095
U096 (1)	U097	U098	U099	U101	U102	U103
U105	U106	U107	U108	U109	U110	U111
U112	U113	U114	U115 (1)	U116	U117	U118
U119	U120	U121	U122	U123	U124	U125
U126	U127	U128	U129	U130	U131	U132
U133 (1)	U134	U135 (1)	U136	U137	U138	U140
U141	U142	U143	U144	U145	U146	U147
U148	U149	U150	U151	U152	U153	U154
U155	U156	U157	U158	U159	U160 (1)	U161
U162	U163	U164	U165	U166	U167	U168
U169	U170	U171	U172	U173	U174	U176
U177	U178	U179	U180	U181	U182	U183
U184	U185	U186	U187	U188	U189 (1)	U190
U191	U192	U193	U194	U196	U197	U200
U201	U202	U203	U204	U205	U206	U207
U208	U209	U210	U211	U213	U214	U215
U216	U217	U218	U219	U220	U221	U222
U223	U225	U226	U227	U228	U234 (1)	U235
U236	U237 (1)	U238	U239	U240	U243	U244
U246	U247	U248	U249	U271	U278	U279
U280	U328	U353	U359	U364	U367	U372
U373	U387	U389	U394	U395	U404	U409
U410	U411					

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

- (1) Codes marked with "(1)" denote restriction to residues from treatment by incineration, carbon regeneration (by thermal incineration), wastewater treatment and any secondary residues such as soils and debris derived from the primary residues.
- (2) Codes marked with "(2)" denote derivation from incineration residues from the incineration of obsolete EPA HW Numbers P090 (which became U242), U212, U230, U231, U232, U233 and U244 now identified as F027 which meet all applicable land disposal restriction standards for F027 in OAC Rule 3745-270-40.
- (3) Codes marked with "(3)" have additional special requirements such as macroencapsulation and pH adjustment as part of their applicable land disposal restriction standards. Refer to OAC Rule 3745-270-40.

## POLLUTION PREVENTION

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

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

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

1. Have you tried to reduce the volume of waste (hazardous and nonhazardous) that you generate? yes
2. What is the largest waste stream that you generate?  
F039 multi source leachate
3. How important would it be to you to eliminate that waste stream?  
Facility continues to look at ways to reduce this waste stream
4. Does your company understand the reduced regulatory burden and cost saving benefits that eliminating or reducing a waste stream can have?  
Yes
5. Could you use better housekeeping practices to reduce the amount of waste that you generate? No

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

1.	Has the company undertaken any P2 activities to reduce the amount of waste generated?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. If so, what has the company done to minimize waste generation?  <input checked="" type="checkbox"/> A change in the process resulting in less waste. <input type="checkbox"/> A change in the product resulting in less waste. <input type="checkbox"/> Use of fewer and less toxic hazardous raw materials. <input type="checkbox"/> Better operations/improved housekeeping. <input type="checkbox"/> On-site recycling/reuse of hazardous materials. <input type="checkbox"/> Sending waste off-site for recycling/reuse. <input type="checkbox"/> Other activities (specify):				

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

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

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

Lack of information about practical alternatives.

Lack of capital to make process changes.

Lack of internal management support (lamp recycling)

The company does not generate enough waste to consider P2.

Other reason given (specify): **Technical Difficulties with LDR requirements**

2.	Does the company plan to do P2 activities in the future?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
3.	Would the company be interested in receiving additional information from Ohio EPA about P2?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
4.	Did you give the company information about P2 during the inspection?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
5.	Would the company like a P2 assessment?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 full 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/P2AssessmentHWGenerators.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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
3.	Have any provisions of the permit been identified as invalid? [PC A.4.]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 2
	a. Is the Permittee continuing any activity regulated by the permit after the expiration date of the permit?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
7.	Does the Permittee properly operate and maintain the facility (and related appurtenances) at all times to achieve compliance with the terms and conditions of the permit? [PC A.9.] If no, then does improper operation and maintenance include:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #1
	a. Ineffective management practices?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #1
	b. Inadequate funding?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	c. Inadequate operator training and staffing?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #1
	d. Where appropriate, inadequate laboratory and process controls, including inappropriate quality assurance/quality control procedures?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
9.	Has the Permittee orally reported to Ohio EPA, DERR within 24 hours from the time the Permittee becomes aware of any instances of noncompliance with the permit, ORC Chapter 3734, or the rules adopted thereunder, which may endanger human health or the environment? If yes, then did the notification include: [PC A.20.(a)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies? [PC A.20.(a)(i)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	b. Name, address, and telephone number of the facility? [PC A.20.(b)(ii)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	c. Date, time, and time of incident? [PC A.20.(b)(iii)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	d. Name and quantity of material(s) involved? [PC A.20.(b)(iv)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	e. The extent of injuries, if any? [PC A.20.(b)(v)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	g. Estimated quantity and disposition of recovered material that resulted from the incident? [PC A.20.(b)(vii)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	If so, then did the report contain the following:				
a.	A description of the noncompliance and its causes? [PC A.21.(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
b.	The period(s) of noncompliance (including exact dates and times)? [PC A.21.(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
c.	Whether the noncompliance has been corrected? [PC A.21.(b)].	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
d.	If no, then the anticipated time noncompliance is expected to continue? [PC A.21.(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #

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

11.	Has the Permittee identified any other instances of noncompliance? If so, then:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 3
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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 3
b.	Do the reports provided contain the information set forth in Condition A.20? [PC A.22.]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 3
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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
a.	Has the Permittee provided the director with advance notice of such changes? [PC A.17.]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #

**NOTE:** *Such notification does not waive the Permittee's duty to comply with the permit pursuant to 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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
14.	Has the permit been transferred to a new owner or operator since the last CEI? [PC A.18.] If so, then:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
17.	Has the facility furnished the director, upon request, copies of records required to be kept by the permit? [PC A.10.]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Has the Permittee promptly submitted such facts, information, or corrected information to the director? [PC A.24.]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
19.	Is the Permittee planning any physical alterations or additions to the permitted facility? If so, then:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 4
	a. Has the Permittee given notice to the director of such alterations/additions as soon as possible? [PC A.15.]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	b. Have such changes been made in accordance with OAC Rule 3745-50-51? [PC A.15.]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 1
	a. WAP in accordance with OAC Rule 3745-54-13, and the terms and conditions of the permit? [PC A.28.(a)(i)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 1
	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	j. All other documents required by PC A.12. and PC F.5. [PC A.28.(a)(x)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
26.	Are laboratory test methods used specified in <u>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, 20<sup>th</sup> 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)]</u>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

	b. Individual(s) who performed the sampling or measurement? [PC A.12.(b)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. Date(s) analyses were performed? [PC A.12.(b)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	d. Individual(s) who performed the analyses? [PC A.12.(b)(iv)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	e. Analytical technique(s) or method(s) used? [PC A.12.(b)(v)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	f. Results of such analyses, including detection limits? [PC A.12.(b)(vi)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 1

**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
32.	Has the Permittee maintained a document repository in compliance with OAC Rule 3745-50-58? [PC A.14.(d)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 9

b. A complete and updated table of contents and accurate tables, sections and references/citations? [PC A.27.(c)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 9
c. Incorporated information required by Permit Conditions B.27, K.9, J.2, and G.2? [PC A.27.(c)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

**MODULE A - REMARKS:**

- ESOI has violated one or more permit conditions which are outlined in this checklist and NOV letter. In addition, since the November 2007 CEI, ESOI has been cited for numerous violations of Permit Conditions A.9, A.14(a), A.22, A.28(a)(vi), J.3(a), and G.3(b) and is subject to accelerated enforcement. See the October 2008 proposed DFFOs.
- ESOI's renewal permit was issued final on December 29, 2005. The renewal permit expires on December 29, 2015.
- ESOI did not report instances of non-compliance with Permit Condition G.3(b) which occurred in dewatering trench Phase 4W on May 5, May 9, June 9 and July 9, 2008. These violations will be addressed through resolution of the proposed orders.
- ESOI is implementing corrective measures for the old waste management units located north of York Street.
- ESOI has requested confidentiality for customer information and stabilization plant processes.
- A modified closure plan and post-closure plan was submitted to Ohio EPA on March 29, 2006.
- ESOI's March 9, 2009 permit modification (PITS# 090309-1-1) included a modified closure and post-closure cost estimate.
- The laboratory QAP (Revision 5.4) was last reviewed on October 7, 2008.
- 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.

**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
10.	Did all WPR approvals expire on the last day of the 13 <sup>th</sup> 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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
11.	Did the letter in #10 above, or the new analysis become part of that specific WPR package? [PC B.3.(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
12.	In the absence of certification, were all WPR's resubmitted to Ohio EPA for re-approval? [PC B.3.(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Was each waste stream verification of analysis completed in accordance with <u>Test Methods for Evaluating Solid Waste: Physical/Chemical Methods</u> , EPA Publication SW-846, or an equivalent method approved by the director? [PC B.3.(c)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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### 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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### Fingerprint Analysis

15.	Does the Permittee perform a fingerprint analysis on representative waste samples as specified in Section C of the permit application? [PC B.3.(e)]. If yes, then:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Does the Permittee compare the results of the fingerprint sampling program to the pre-acceptance analysis for the waste stream? [PC B.3.(e)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Have any significant discrepancies been noted during the fingerprint analysis? If yes, then:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 12
	i. Did the Permittee notify the generator? [PC B.3.(e)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Does the Permittee prohibit the disposal of waste that fails the paint filter test? [PC B.3.(e)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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18.	Does the Permittee fingerprint at least every 10 <sup>th</sup> bulk load received by the facility? [PC B.3.(f)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. One sample per 25 tons of waste from each Hopper railroad car? [Condition B.3.(f)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. One sample per 25 tons of waste from each intermodal container collected and composited together? [PC B.3.(f)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
22.	Are all drums opened and inspected for free liquids prior to disposal? [PC B.3.(g)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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**NOTE:** The PC B.3.(h)(ii) requirement above does not apply if:

- a. The waste is to be further treated or disposed of off-site; or,
- b. The same waste code, having the same WSID from the same generator is processed through the same treatment units and under the same operating conditions.  
[PC B.3.(h)(ii)]

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

26.	Is the Permittee following the sampling frequency identified in the question above until valid test results have been obtained indicating that the Permittee's stabilization procedures are effective to comply with land-ban regulations? [PC B.3.(h)(iii)]. If yes, then:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Did the Permittee notify Ohio EPA of these findings? [PC B.3.(h)(iii)].	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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### 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
31.	Is "initial qualification" established by testing a sequence of either 5, 10, or 20 consecutive batches? [PC B.3.(k)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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)©? [PC B.3.(k)(iv)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # B1
46.	Has the Permittee provided a fence that surrounds the facility? [PC B.4.(c)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # B1
47.	Has a new or replacement fence been installed after the effective date of the permit? If yes, then:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # B1
	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # B1
48.	Is internal security to the active disposal cell(s) always maintained within fences or gates? [PC B.4.(c)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # B1
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # B1
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK # B2
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK # B2

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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
55.	Does the Permittee ensure that items that are not inspected are marked with "NI" on the checklist? [PC B.5.(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK # B2

### Scale Inspections

57.	Does the Permittee inspect each scale and the surrounding area on a weekly basis? [PC B.5.(c)(i)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
60.	Does the Permittee check service records of all scale equipment? [PC B.5.(c)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
64.	Are all main gates monitored during regular business hours by persons trained in security procedures? [PC B.5.(d)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Does the inspection include an assessment of the integrity of the pad and curbing? [PC B.5.(e)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

### Tank Storage Area Inspections

68.	Does the Permittee inspect all tank storage areas on a weekly basis, and after a rainfall event ( $\geq 2$ " of rainfall in 8 hours)? [PC B.5.(f)(i)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
83.	During construction, did the Permittee inspect and test earthen and synthetic liner components? [PC B.5.(h)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
84.	Have all aspects of liner construction been inspected for conformance with construction specification? [PC B.5.(h)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Were pockets of run-on water or exposed containers observed? If yes, then:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Were these observations noted on the inspection checklist? [PC B.5.(h)(v)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
92.	Does the Permittee inspect all fire fighting equipment as needed to assure that equipment is in place, unobstructed, and operational? [PC B.5.(i)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
100.	Are all monitoring wells inspected to verify that they are locked when not in use? [PC B.5.(j)(v)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
102.	Is the facility's personnel training program directed by a person trained in hazardous waste management procedures? [PC B.6.(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
103.	Does the facility's personnel training program include instruction in waste management procedures and contingency plan implementation? [PC B.6.(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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)]. <b>Including:</b>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment? [PC B.6.(b)(ii)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Key parameters for automatic waste feed cut-off systems? [PC B.6.(b)(ii)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. Communications or alarm systems? [PC B.6.(b)(ii)(c)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	d. Response to fire or explosions? [PC B.6.(b)(ii)(d)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

	e. Response to groundwater contamination incidents? [PC B.6.(b)(ii)(e)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	f. Shutdown of operations? [PC B.6.(b)(ii)(f)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
115.	Does the Permittee take precautions as to prevent accidental ignition or reaction of ignitable or reactive wastes? [PC B.7.(d)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

116.	Are ignitable and reactive wastes separated and protected from sources of ignition or reaction? [PC B.7.(d)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
118.	Are appropriate signs posted wherever ignitable, reactive, or incompatible wastes are managed? [PC B.7.(d)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	d. Damage structural integrity of the device or the facility? [PC B.7.(f)(iv)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	e. Through other like means, threatens human health and the environment? [PC B.7.(f)(v)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	f. When required to comply with the PC B.7.(a) has the Permittee documented such compliance? [PC B.7.(f)(vi)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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#### 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 13
124.	Does the Permittee maintain in each building an accessible, manual audible alarm warning system? [PC B.9.(a)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Has the vehicle been equipped with spill control and first aid materials? [PC B.9.(a)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
127.	Have fire extinguishers, and fire control equipment been installed and located in appropriate work areas? [PC B.9.(a)(iv)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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## 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 13
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 13
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 13
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

## REQUIRED AISLE SPACE

139.	Does the Permittee maintain aisle space to assure unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility? [PC B.12.(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
140.	Has the Permittee constructed and maintained an access road of sufficient width to accommodate a fire truck between Cell M and the tank farms/container storage areas? [PC B.12.(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Did the Permittee immediately implement the approved contingency plan? [PC B.14.]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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© 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 14
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### 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 14
151.	Has the Permittee submitted copies of the contingency plan to all local emergency response agencies? [PC B.18.(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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### 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. For waste defined as K061 EAF Dust in PC B.3.(h)(i), a working document or database, of the key parameters that influence the treatment process as this information becomes available? [PC B.22.(a)] If yes, then does this document or database contain the following:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	i. The identification of the batch being treated and/or tested? [PC B.22.(a)(i)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	ii. The date samples are collected for the purpose of testing? [PC B.22.(a)(i)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	iii. The identification name of the mix design used? [PC B.22.(a)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	iv. The percent available free lime in the raw waste? [PC B.22.(a)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	ii. Individual(s) who performed the sampling measurements? [PC B.22.(b)(ii)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	iii. Analytical technique(s) or method(s) used? [PC B.22.(b)(ii)(c)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	iv. Results of such analysis? [PC B.22.(b)(ii)(d)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	v. Description of waste analysis discrepancies? [PC B.22.(b)(ii)(e)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	e. Copies of all closure notices, certifications, and documents required during the post-closure care period? [PC B.22.(c)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	ii. A survey plat indicating landfill location and record of hazardous waste in each cell? [PC B.22.(d)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	iii. Inspection reports and log forms including any remedial action? [PC B.22.(d)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	iv. Detailed reports of incidents requiring implementation of the Contingency Plan? [PC B.22.(d)(iv)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	v. Documentation of post-closure personnel training of employees or contractors? [PC B.22.(d)(v)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	vi. Certification of post-closure and notice in deed? [PC B.22.(d)(vi)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
ii. Certificate of insurance? [PC B.22. (e)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
h. Records of landfill and SCB leak detection/collection systems? [PC B.22. (f)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
ii. Tank and containment coating certification? [PC B.22. (i)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
iii. Proper installation? [PC B.22. (i)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
iv. "As-built" drawings for tank foundation and containment areas? [PC B.22. (i)(iv)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
l. Does the Permittee retain the following documentation for each new secure landfill cell:				
i. Exploratory boring logs and any sample test results? [PC B.22. (j)(i)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
ii. Construction inspection reports, logs, soils and water sample analysis, moisture content, compaction, and permeability test results? [PC B.22. (j)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
iii. Corrective or remedial work reports, including sand zone replacement? [PC B.22. (j)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
iv. Manufacturer's weak seam evaluation reports? [PC B.22. (j)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
vi. Geologic maps of cell excavations and associated soil gradation analyses? [PC B.22. (j)(v)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
vii. Record of compliance with ignitable, reactive, or incompatible waste restrictions for each secure cell? [PC B.22. (j)(vi)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
If yes, then do the records include the following:				

	i. Well boring and/or core logs? [PC B.22.(k)(i)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	ii. Soil sample gradation analyses and permeability test results? [PC B.22.(k)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	iii. Well completion reports? [PC B.22.(k)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	iv. Sampling logbook? [PC B.22.(k)(iv)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	v. Various ground water flow and direction reports? [PC B.22.(k)(v)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	vi. Compliance monitoring soil vapor survey data? [PC B.22.(k)(vi)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	vii. Interim information reports and final source determination reports? [PC B.22.(k)(vii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	viii. Corrective action feasibility plans? [PC B.22.(k)(viii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	ix. Variance applications? [PC B.22.(k)(ix)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	x. Sample custody forms? [PC B.22.(k)(x)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	xi. Ground water analysis and QA/QC reports? [PC B.22.(k)(xi)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	xii. Background concentration calculations? [PC B.22.(k)(xii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	xiii. Statistical test calculation done in accordance with OAC Rules 3745-54-97, 98, and 99? [PC B.22.(k)(xiii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
161.	Does the Permittee notify the director, in writing, at least 4 weeks in advance of the date that the Permittee expects to receive hazardous waste from a non-United States source? [PC B.2(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 15

**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
163.	Does the Permittee keep the written notice in above question as part of the operating record? [PC B.2.(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
164.	Has the Permittee attempted to reconcile all significant discrepancies discovered in waste manifests? [PC B.24.(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 16
165.	Has the Permittee received any unmanifested waste, not excluded from the manifest requirements of OAC Rule 3745-51-05? [PC B.24.(c)] If yes, then:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Did the Permittee submit an unmanifested waste report to the director within 15 days after receipt of the waste in accordance with OAC Rule 3745-54-76? [PC B.24.(c)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 17
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#### 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 18
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 19
169.	Has the Permittee amended the approved closure plan? If so, then:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Was the plan amended in accordance with OAC Rule 3745-55-12©? [PC B.28.]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 20

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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 20
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**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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 20
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**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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 20
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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 20

#### 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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 20
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**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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 20
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## GENERAL POST-CLOSURE REQUIREMENTS

177.	Has the Permittee begun 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 21
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 21
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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)(l)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 21
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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 21
	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 21
	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 21
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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 21

**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
190.	Are the closure and post-closure trust funds:				
	a. Irrevocable? [PC B.37.(f)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Worded in such a manner as to cause the funds to be tax exempt? [PC B.37.(f)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
191.	Has the Permittee relinquished its rights to any excess monies in the funds? [PC B.37.(f)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 21

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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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### 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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### 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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### MODULE B - REMARKS:

- B1. During March 2009, ESOI requested comment from Ohio EPA on ESOI's intention to reduce or eliminate security staff for the active portion of the facility. Ohio EPA reiterated comments it made during the January 2009 CEI Exit Interview regarding the condition of the fence line at the facility. Ohio EPA also provided photographs to ESOI detailing a number of areas along the fence line that needed maintenance in order to meet the requirements of P.C. B.4(c) and OAC Rule 3745-54-14(B)(2)(a).
- B2. Since the November 2007 CEI inspection, ESOI has been cited for multiple violations of P.C. B.5 and B.5(b). During the January 2009 CEI, Ohio EPA discovered that ESOI failed to maintain records of the Stabilization/Containment Building vents and ducts.

**MODULE B – REMARKS cont.:**

10. ESOI has not accepted F027 since the date of the last CEI inspection.
11. As of 1/21/09 (for 2009) ESOI had received 4,291.54 tons (8,583,080 pounds) of waste (this includes on-site waste, and both RCRA and Non-RCRA waste). According to records ESOI provided during the January 2009 CEI, in 2008 ESOI received 154,773.16 tons (309,546,320 pounds) of waste.
12. Debris/Non-debris issues have been noted during the fingerprint analysis.
13. Emergency telephones located in the LSTB, SCB, and Areas M & N have been removed or are inoperative. However, ESOI employees carry two-way radios in case of an emergency.
14. The most recent revision of the Contingency Plan (revision #11, modified on 5/2/08) was last reviewed on June 12, 2008.
15. ESOI has not received any waste from a foreign source since the date of the last CEI inspection.
16. Per Ohio EPA inspection of incoming waste manifests, ESOI has rectified all manifest discrepancies since the date of the last CEI inspection.
17. ESOI submitted their 2008 annual report on February 20, 2009.
18. Inactive portions of ESOI have been closed. Cell M, container storage areas, tank storage areas, the SCB and LSTB remain operational.
19. Section I of the facility permit application has been submitted but remains under review by Ohio EPA.
20. Cell M remains active and is expected to be active until at least 2012.
21. Post-closure care is on-going for the closed RCRA regulated cells at the facility. None of these closed cells have reached the end of their 30-year post-closure care period. Cell M remains active.

**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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK # C1
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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**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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
8.	Does the Permittee use containers made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so the container is not impaired? [PC C.5.]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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10.	Does the Permittee ensure that containers are handled in a manner that prevents rupture or leakage? [PC C.6.(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
11.	If lab-packs are generated, are they handled in compliance with applicable storage requirements? [PC C.6.(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
13.	Is loading and unloading of containers or drums conducted at locations where secondary containment is provided? [PC C.6.(d)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # C2
14.	When handling drums, does the Permittee take all reasonable steps to prevent damage to or rupture of containers? [PC C.6.(e)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # C3
17.	Does the Permittee ensure that pallets are stacked no more than two layers high? [PC C.6.(f)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # C3
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. The date received into storage bay? [PC C.6.(h)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. Permittee load number and/or container sequence number (for on-site generated waste)? [PC C.6.(h)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	d. Generator name? [PC C.6.(h)(iv)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	e. Waste Stream Identification Number (WSID) [PC C.6.(h)(v)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
23.	Are the containers elevated or otherwise protected from contact with accumulated liquids? If no, then:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
24.	Does the Permittee prevent run-on into the containment systems? [PC C.7.(d)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

#### RAILROAD SPUR TRACK – AREAS M, N, AND T

28.	Are railroad locomotives permitted to enter the SCB? [PC C.8.(a)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
29.	Do all railcar movements into and away from the facility occur at speeds less than 10 mph? [PC C.8.(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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	a. Is the inspection schedule designed to detect for leaking containers, deteriorating containers and/or containment systems? [PC C.9.(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
36.	Are all railroad cars inspected by trained personnel prior to entering and/or exiting the facility? [PC C.9.(d)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

### RECORDKEEPING

37.	Has the Permittee complied with all recordkeeping requirements of OAC Rule 3745-54-73? [PC C.10.(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Waste type and description? [PC C.10.(c)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. The date received into storage area? [PC C.10.(c)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	d. Location? [PC C.10.(c)(iv)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	e. Date removed from the storage area? [PC C.10.(c)(v)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	f. Permittee load number and/or container sequence number? [PC C.10.(c)(vi)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	g. Generator name? [PC C.10.(c)(vii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	h. Waste Stream Identification Number? [PC C.10.(c)(viii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 22
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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 22
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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 22
	a. Class I flammable liquids only in metal containers? [PC C.11.(d)(I)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 22
	b. Class II and Class III combustible liquids only in metal or polyethylene containers? [PC C.11.(d)(i)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 22
	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 22

**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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 22
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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 22
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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 22
	b. Oxidizers? [PC C.12.(d)(ii)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 22
	c. Reducers? [PC C.12.(d)(iii)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 22
	d. Acids? [PC C.12.(d)(iv)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 22
	e. Bases? [PC C.12.(d)(v)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 22
	f. Acid sensitive wastes? [PC C.12.(d)(vi)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 22
	g. Alkaline sensitive wastes? [PC C.12.(d)(vii)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 22
	h. Water reactive wastes? [PC C.12.(d)(viii)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 22

**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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 23
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**MODULE C - REMARKS:**

- C1. Permit Condition C.1(a)(ii) and Table C-2 identify and describe the storage capacity for the five storage areas located inside of the Stabilization/Containment building. During the January 2009 CEI, Ohio EPA observed waste in excess of the 50-cubic-yard storage capacity present in Storage Area E. Ohio EPA requested that ESOI submit a permit modification to amend Permit Module C and Drawing D-2000L-G01. On March 12, 2009, Ohio EPA received PITS# 090309-1-1 (Modification 025) from ESOI which address this concern. Ohio EPA is currently reviewing this permit modification request.
- C2. Since the June 2008 CEI, Ohio EPA has observed ESOI unloading and loading lugger boxes near the M5 primary risers in a location that does not have secondary containment. ESOI has stopped conducting this activity in this area and currently manages the loading and unloading of these lugger boxes in Storage Area K.
- C3. Permit Condition C.6(f) requires the Permittee to store containers on pallets if they are of a size and type that can be placed on pallets. During the January 2009 CEI, Ohio EPA observed 15 X 55-gallon steel drums in storage area C8 (Truck Dock Unloading Platform Area – See Drawing D-2000L-G01) that were not stored on pallets. ESOI should take steps to ensure that these types of containers are placed on pallets when in storage.
- 22. ESOI has not generated, treated, or stored ignitable, reactive or incompatible hazardous waste since the date of the last CEI inspection.
- 23. ESOI has not closed any container storage areas since the last CEI inspection.

**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 24, 25
2.	Has the Permittee treated any hazardous waste in a tank? [PC D.2.(a)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 24
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. A conservation breather vent?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. A man-way?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	d. A separate fill/drain line?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	e. A plug or ball valve with resistant seal, or equivalent?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
5.	Has the Permittee installed a vapor balancing system in all tanks containing organic compounds? [PC D.3.(b)(i)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 25
6.	Are tanks handling ignitable wastes grounded and equipped with flame arresters explosion-proof controls? [PC D.3.(b)(i)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 25
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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 25

**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. When found, is all such damage inspected by the liner installation contract inspector and repaired? [PC D.4.(g)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

**OPERATING REQUIREMENTS**

14.	Does the Permittee operate the tank systems to ensure that hazardous wastes or treatment reagents are not placed in the tank, its ancillary equipment, or the containment system if such placement could cause a rupture, leak, corrosion or failure? [PC D.5.(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. The tanks are not used for mixing non-compatible wastes? [PC D.5.(b)(i)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
18.	Upon completion of waste transfer, is the storage tank gauged and the tank's valve locked? [PC D.5.(b)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
20.	Does the Permittee prohibit smoking and place "No Smoking" signs in clear view in the tank area? [PC D.5.(d)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
23.	Does the Permittee inspect the overfill controls in accordance with the permit application? [PC D.6.(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Data gathered from monitoring and leak detection equipment to ensure appropriate operation? [PC D.6.(c)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
25.	Is compliance with PC D.6. documented in the operating record? [PC D.6.(d)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Quantity of each waste that was added or removed? [PC D.6.(e)(i)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

	b. The EPA waste code number of the waste material transferred? [Condition D.6.(e)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. Any additional information or comments concerning the waste compatibility and/or waste processing for safe operation of the tank? [PC D.6.(e)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	e. The level control devices/equipment to ensure that they are operating properly? [PC D.6.(e)(v)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 26

### 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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	e. Rinse the area of the spill along with the collection sump, if impacted by the release? [PC D.7.(a)(iii)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
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### 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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
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**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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
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	If yes, then did the report contain the following information:				
	a. Likely route of migration of the release? [PC D.8.(b)(i)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	b. Characteristics of the surrounding soil? [PC D.8.(b)(ii)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	c. Results of any monitoring or sampling conducted in connection with the release (if available)? [PC D.8.(b)(iii)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	e. Description of response actions taken or planned? [PC D.8.(b)(v)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 26
34.	Does the Permittee keep on file at the facility the written assessment of the tank system's integrity? [PC D.8.(d)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 26
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 26

#### 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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	b. Was the tank solely used for emergencies? [PC D.10.(a)(ii)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	d. Was documentation for compliance with this condition placed in the operating record? [PC D.10.(a)(iv)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

**MODULE D - REMARKS:**

- 24. ESOI has not constructed New Tanks S-4, S-5, S-6 or S-7 since the date of the last CEI. During March 2009, ESOI purchased and placed a 20,000-gallon storage tank in Storage Area K for the storage of hazardous waste liquids collected by ESOI's on-site vacuum tankers (primarily F039, K061). ESOI determined this tank exceeded the capacity of the secondary containment in Area K and could not be placed into service (OAC Rule 3745-66-93). Ohio EPA requested ESOI to submit a class determination request so that the Agency could consider the placement of this 20,000-gallon tank in Area O inside Cell M. As an alternative, ESOI is considering placing one or two 10,000-gallon storage tanks in Storage Area K.
- 25. ESOI does not store ignitable or reactive waste in New Tanks S-100, S-200, S-300, or S-400. ESOI has characterized the leachate stored in these New Tanks as F039 and D002 hazardous waste.
- 26. The annual inspections of S-Tanks 100, 200, 300, and 400 were completed between April 1 and July 31, 2008. These included ultrasonic testing, interior/exterior and secondary containment inspections for each tank. MSG submitted a report dated August 1, 2008, for these tank inspections.

**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 (Campaign Bin, Sort Floors & Crusher)? [PC F.1.(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. The identity of the contents clearly marked on each area/bin which contains hazardous waste restricted from land disposal?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. The date each period of accumulation began clearly marked on each area/bin which contains hazardous waste restricted from land disposal?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
4.	Prior to accepting any waste stream for stabilization or encapsulation treatment, or prior to submitting a WPR form to Ohio EPA, does the Permittee conduct a pre-acceptance analysis for each such waste stream and submit analytical/treatment reports along with the WPR package? [PC F.2.(b)]. If yes, then do the reports contain:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Waste code designation and analytical data showing its constituents (quantitatively)? [PC F.2.(b)(i)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

	b. The exact type, sequence, and/or combination of treatment methods designated for said wastes? [PC F.2.(b)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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**DESIGN AND CONSTRUCTION STANDARDS**

8.	Is the SCB completely enclosed with a floor, walls, and a roof? [PC F.4.(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK#
	b. Physical contact with wastes to which they are exposed?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK#
	c. Climatic conditions?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK#
	d. Stresses of daily operation, including movement of heavy equipment and contact of the equipment with the containment walls?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK#
11.	Is the SCB designed so that it has sufficient structural strength to prevent collapse or other failure? [PC F.4.(c)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Do the doors and windows provide an effective barrier against fugitive dust emissions? [PC F.4.(e)(i)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Granular drainage material with a hydraulic conductivity of $1 \times 10^{-2}$ cm/sec or more?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. Granular drainage material with a thickness of 12 inches (30.5 cm) or more?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	d. A constructed or synthetic drainage layer with transmissivity of $3 \times 10^{-5}$ m <sup>2</sup> /sec or more?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
27.	Does the Permittee maintain a baghouse, or an equivalent device on all Air Pollution Control Systems located in the SCB? [PC F.4(p)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Are performance evaluations conducted on a yearly basis during the operating life of the SCB?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. Are vents and ducts inspected not less than annually?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 27
	d. Are records of these inspections maintained on site?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 27

#### 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	i. Is the split screen inspected periodically and repaired or replaced as needed? [PC F.5.(d)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

32.	Has the Permittee unloaded more than 24 pneumatic tank trucks per day? [PC F.5.(d)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
38.	Is all water removed from the run-off collection system treated as potentially contaminated? [PC F.5.(f)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. Record in the operating record the dates when material is removed from the sumps? [PC F.5.(f)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Waste type and description? [PC F.5.(k)(i)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. ESOI load number and/or container sequence number (for on-site generated waste)? [PC F.5.(k)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. Generator name? [PC F.5.(k)(iv)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	d. Waste Stream Identification Number? [PC F.5.(k)(v)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 28
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 28

## 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Waste type and description? [PC F.8.(b)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. Date received into storage area? [PC F.8.(b)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	d. Location (by storage area)? [PC F.8.(b)(iv)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	e. Date removed from storage area? [PC F.8.(b)(v)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

	f. ESOI load number and/or container sequence number? [PC F.8.(b)(vi)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	g. Generator name? [PC F.8.(b)(vii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	h. Waste Stream Identification Number (WSID)? [PC F.8.(b)(viii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 22
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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 22

### ENCAPSULATION TECHNOLOGY

53.	Does the Permittee perform encapsulation technology on waste that is debris based upon visual inspection? [PC F.10.(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
57.	Does the Permittee use only material compatible with the waste being encapsulated as an encapsulating agent? [PC F.10.(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

59.	Has the Permittee performed a quality control check on all waste that undergoes encapsulation treatment? [PC F.10.(c)].	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 29
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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 29
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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 29
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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 29

**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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 30
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**MODULE F - REMARKS:**

22. (See also Module C comment #22 on page 45) ESOI has not generated, treated, or stored ignitable, reactive or incompatible hazardous waste since the date of the last CEI inspection.

27. During the January 2009 CEI, Ohio EPA requested ESOI to provide annual vent and duct inspection records for 2006, 2007, and 2008. ESOI could not provide any records documenting that the required annual vent and duct inspections had been conducted.

ESOI believes that vent and duct inspections have been conducted on an annual basis; however, ESOI does not believe that any record of those inspections have been maintained at the facility.

28. ESOI has been cited for violations of P.C. F.6(b) since the November 2007 CEI. This area of concern was discussed with ESOI during the December 11, 2008 settlement meeting and will be addressed through resolution of the proposed orders. In correspondence dated March 6, 2009, Ohio EPA proposed modifications to the language in Sections 6.1 and 6.2 of Appendix D.22 of ESOI's Part B Permit Application. As of the date of this letter Ohio EPA has not received a Class 1 permit modification request from ESOI to update Appendix D.22.

ESOI currently appears to be following the procedures of the RAP.

Since the June and September 2008 CEIs ESOI has notified Ohio EPA of implementation of the RAP for CBS-1 (ILR exceedance – March 25, 2009) and CBS-2 (ALR exceedance – March 11, 2009). CBS-2 returned to liquid levels below the ILR for the week ending March 24, 2009. As of the date of this correspondence, ESOI has not notified Ohio EPA that CBS-1 has returned to liquid levels below the ILR.

29. ESOI has not conducted macro-encapsulation since the date of the last CEI inspection.

30. 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.

**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
2.	Does the Permittee remove and dispose liquids in accordance with the Agreement and applicable regulations? [PC G.1.(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
6.	Does the Permittee keep liquid levels in the dewatering trenches below the bottom of the adjacent waterline? [PC G.3.(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 31
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 31
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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. The monitoring trench cap for erosion and/or damage? [PC G.4.(a)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. The collection sumps for damage? [PC G.4.(a)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	d. The City of Toledo easement for evidence of leakage from the waterlines? [PC G.4.(a)(iv)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	e. The presence of liquid in the trenches? [PC G.4.(a)(v)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 31
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 32

## 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

### MODULE G - REMARKS:

31. Since the November 2007 CEI, ESOI has been cited for numerous violations of Permit Conditions G.3(b) and G4(a)(v). These citations include multiple violations for records reviewed during the June and September 2008 CEIs showing that liquid levels in dewatering trench Phase 4W exceeded the invert elevation of the raw waterlines on May 5, May 19, June 9, and July 9, 2008.

This area of concern was discussed with ESOI during the December 11, 2008, settlement meeting and will be addressed through resolution of the proposed orders.

In correspondence dated March 6, 2009, Ohio EPA proposed that ESOI meet with Ohio EPA technical staff to discuss changes to the inspection and pumping schedules for the dewatering trenches and modifications to the permit language in Module G. ESOI and Ohio EPA began these discussions on March 31, 2009.

32. ESOI needs to ensure that it notifies both the City of Toledo and the Ohio EPA within 24 hours of observing evidence of leakage from the waterlines. ESOI failed to notify Ohio EPA within 24 hours on at least two occasions during 2007.

**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 21
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**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
3.	Does the Permittee monitor the ground water in accordance with Module K, Integrated Ground Water Monitoring Program? [PC I.2.(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 34
5.	Has the Permittee continued to operate the leachate collection and removal system until leachate is no longer detected? [PC I.2.(d)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 35
6.	Are existing leachate systems operational and in good repair? [PC I.2.(d)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
7.	Is the leachate system inspected monthly and repaired if required? [PC I.2.(d)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
8.	Does the Permittee remove any leachate that is found in the system and ship the leachate off-site to an approved TSDF? [PC I.2.(d)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
11.	Are erosion control structures maintained during post-closure care? [PC I.2.(d)(iii)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Is erosion damage repaired and corrected as it occurs? [PC I.2.(d)(iii)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
12.	Does the Permittee inspect the facility monthly, or after every major rainfall for erosion or pooling of water? [PC I.2.(d)(iii)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. When found, is erosion or pooled water corrected? [PC I.2.(d)(iii)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
13.	Does the Permittee monitor and maintain erosion controls (slopes/vegetation) in accordance with the facility's approved post-closure care plan? [PC I.2.(d)(iii)(f)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
14.	Are all surveyed benchmarks protected and maintained? [PC I.2.(d)(iv)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

#### GENERAL FACILITY CARE

15.	Does the Permittee perform grass cutting and shrub care as needed (at least annually) [PC I.2.(d)(v)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 33
	a. Does the Permittee remove damaged or dead vegetation and replace with equivalent vegetation? [PC I.2.(d)(v)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Does the Permittee prohibit the growth of trees, shrubs, or other deep-rooted plants on closed waste units? [PC I.2.(d)(v)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. Does the Permittee repair and re-vegetate areas damaged by erosion? [PC I.2.(d)(v)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
16.	Has the Permittee removed trees, shrubs or other deep-rooted plants in the fall quarter of the year? [PC I.2.(d)(v)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
17.	Did the Permittee notify the Ohio EPA on-site inspector verbally, by letter, or by telephone at least 48 hours prior to beginning the removal of vegetation? [PC I.2.(d)(v)(a)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 36

**NOTE:** On-site staff at their discretion, can exempt the Permittee from the 48 hour notification requirement.

18.	Does the Permittee promptly repair any damage to the closed waste unit cover system caused by the growth or removal of trees, shrubs, or other deep-rooted plants? [PC I.2.(d)(v)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 33
19.	Are buildings located on the site maintained in good repair? [PC I.2.(d)(v)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Are all permits, fire codes, etc., maintained and complied with? [PC I.2.(d)(v)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
20.	Are existing roadways being maintained in good repair? [PC I.2.(d)(v)(c)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
21.	Has the Permittee constructed any new roadways over any final cover areas? If so,	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Did the Permittee receive approval from Ohio EPA for such construction? [PC I.2.(d)(v)(c)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
22.	Are roadways maintained, as necessary, during inclement weather as to provide access to all areas? [PC I.2.(d)(v)(c)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
23.	Are all existing drainage ditches being maintained and kept free of debris? [PC I.2.(d)(v)(d)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
24.	Has the Permittee constructed drainage ditches on closed hazardous waste areas or altered the drainage flow? If so,	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Did the Permittee obtain approval from Ohio EPA to make such changes? [PC I.2.(d)(v)(d)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
25.	Are all utilities maintained operational? [PC I.2.(d)(v)(e)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
26.	Are electrically operated security and monitoring devices equipped with an internal back-up power source to allow for operation in the event of a main power outage? [PC I.2.(d)(v)(e)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
27.	Does the Permittee prohibit underground utility construction in areas used previously for hazardous waste disposal? [PC I.2.(d)(v)(e)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

### SECURITY REQUIREMENTS

28.	During the period of post-closure care, is the Permittee maintaining fencing, which prevents unauthorized entry into the facility? [PC I.2.(e)(i)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK # B1
	a. Is the fencing inspected monthly? [PC I.2.(e)(i)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Where necessary, is the fencing repaired or replaced if damage is found? [PC I.2.(e)(i)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK # B1

29.	Have all existing warning signs been inspected monthly, and maintained or replaced to meet the readability requirements described in the OAC Rule 3745-54-14(C)? [PC I.2.(e)(ii)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
30.	Are all site entrance/exit gates maintained in operable condition and securely locked when not monitored by a gate keeper? [PC I.2.(e)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Are gate locks inspected weekly? [PC I.2.(e)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
31.	Are all ground water monitoring wells inspected weekly and equipped with locking caps? [PC I.2.(e)(iv)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Do ground water monitoring well caps remain locked except when sampled? [PC I.2.(e)(iv)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
32.	Has the Permittee noted any signs of unauthorized entry onto the premises? If so, then:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Did the Permittee immediately notify the director? [PC I.2.(e)(v)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	b. Did the Permittee inspect the facility once per week for the month following the incident? [PC I.2.(e)(v)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
38.	Within 60 days of certification of closure of the first and last hazardous waste disposal unit, did the Permittee record a notation on the deed to the facility property, including the information as specified in PC I.4.(b)(i)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 21
39.	Has the Permittee submitted a signed certification to the director, that he has recorded the above notation, including a copy of the document in which the notation was placed? [PC I.4.(b)(ii)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 21
40.	Has the Permittee requested a modification in accordance with OAC Chapter 3745-50 to remove hazardous waste and hazardous waste residues, the liner (if any), or contaminated soils? [PC I.4.(c)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 30
	a. Did the removal of the hazardous wastes, specified above, satisfy the criteria of OAC Rule 3745-55-17©? [PC I.4.(c)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK # 30

**NOTE: By removing hazardous waste, the Permittee may become a generator of hazardous waste and must manage it in accordance with all applicable hazardous waste requirements.**

41.	No later than 60 days after the completion of the established post-closure care period for each hazardous waste disposal unit, did the Permittee submit to the director a certification of completion of post-closure care in accordance with PC I.4.(d)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
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#### FINANCIAL ASSURANCE

42.	Has the Permittee maintained financial assurance during the post-closure period and complied with all applicable requirements? [PC I.5.(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
44.	Has the Permittee submitted itemized bills to the director to request reimbursement for post-closure care? [PC 1.5.(c)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	b. Did the request include a copy of the proposed amended post-closure plan for Director approval? [PC 1.6.]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 1.6.]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 1.6.]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #

**MODULE I - REMARKS:**

- 21. (See Module B comment #21 on page 39) Post-closure care is on-going for the closed RCRA regulated cells at the facility. None of these closed cells have reached the end of their 30-year post-closure care period. Cell M remains active.
- B1. (See Module B comment B1 on page 38)
- 30. (See Module F comment #30 on page 64) 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.

*MODULE I – REMARKS cont.:*

33. Permit Condition 1.2(d)(v)(a) states that grass cutting must be performed by the Permittee as needed, but at least annually.

During the January 2009 CEI exit interview, Ohio EPA discussed the condition of the north side of Cell F with ESOI (photograph provided) as it appeared that this area had not been mowed during 2008. ESOI insisted that this area of Cell F had been cut at least once during 2008, but could not provide any records documenting the date(s). Ohio EPA noted that the height of the vegetative growth on the north side of Cell F made it extremely difficult for agency personnel and ESOI staff to determine the condition of the cover system or to inspect for possible rodent damage. As stated during the June 2008 CEI, Ohio EPA has observed (with the exception of this area on Cell F during 2008) that ESOI mows grass and vegetative growth annually.

ESOI should mow the facility more frequently to ensure that the Post-Closure Inspections can be properly completed.

34. 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.
35. ESOI continues to remove leachate from closed cells F, G, H, and I. In addition, Retrofit Leachate Collection Systems (RLCS) were installed and began operation on SWMU's #5, #6, and #7 during 2007.
36. Ohio EPA requests ESOI to return to the practice of notifying on-site staff 48 hrs. prior to beginning this activity.

**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
2.	Is the Permittee in compliance with the WPR approval process described in the record? [PC J.1.(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Water reactive or pyrophoric wastes, except as specified in OAC Rule 3745-57-12? [PC J.1.(d)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. Class 1 explosives, as defined in 49 CFR 173.50(b)(1) and (2)? [PC J.1.(d)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	d. Shock sensitive wastes? [PC J.1.(d)(iv)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	e. Polychlorinated biphenyls regulated by the TSCA (GT/ET 50 ppm)? [PC J.1.(d)(v)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	f. Radioactive waste regulated by the Nuclear Regulatory Commission? [PC J.1.(d)(vi)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	g. Infectious wastes? [PC J.1.(d)(vii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	h. Any waste in gaseous form? [PC J.1.(d)(viii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	ii. Produce leachate that is incompatible with the synthetic liner(s) and leachate collection system piping? [PC J.1.(d)(xii)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	iii. Generate gases that adversely affect the permeability of the clay cap? [PC J.1.(d)(xii)(c)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
6.	Does the Permittee comply with all Land Disposal Restrictions as specified in OAC Chapter 3745-270?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Have in-situ field density tests been used to verify the desired degree of compaction? [PC J.2.(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	d. Has all earthfill material used been brought to proper water content? [PC J.2.(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

12.	Does the cap for cell M consist of a 3-foot thick uppermost soil layer composed of a 6-inch layer of soil that supports vegetation, and a 30-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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# 37
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# 37
14.	Has any component of the landfill system or construction techniques failed to perform as required since the last CEI? If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 $3.6 \times 10^{-8}$ cm/sec as determined using the slug tests in upper till and utilizing the Bouwer and Rice method)? [PC J.2.(n)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
24.	Does the above-grade design and construction of Cell M meet the specifications of PC J.2.(o)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 39

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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Has the engineer been selected and paid for by the Permittee and approved by Ohio EPA? [PC J.2.(q)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	i. Notify Ohio EPA on-site staff at least 3 days prior to the sampling event?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 38

	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	iii. Sample was transported following the standards outlined in ASTM D-4220, "Practices for Preserving and Transporting Soil Samples"?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	iv. Sample was allowed to cure for a minimum of one week but not more than 4 weeks?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	v. Sample was tested at an independent lab or by the Permittee in accordance with ASTM D-2166-00?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Is the reported shear strength less than 2000 psf during any month? If yes, then:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	i. Were three core samples taken from the same slab within 60 days of the original sampling date?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	c. Have 12 consecutive tests shown that the 2000 psf shear strength requirement has been met? If yes, then:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# 38
	i. Was testing completed every 2 months?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

	d. Was a Class 1 permit modification submitted within 90 days of permit issuance to revise applicable portions of the application?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
30.	Did the sampling specified above begin within two (2) weeks from the effective date (September 15, 2005) of this permit?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK# 39
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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK# 39
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. If activation of the pump produces no liquids, then did the Permittee verify that the pump was operable before concluding that no liquid was present in the sub-cell sump? [PC J.3.(c)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
39.	Are truck tires and frames decontaminated when coming into contact with hazardous waste? [PC J.4.(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
41.	During periods of high winds, does the Permittee take mitigative steps to minimize wind dispersal? [PC J.4.(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
44.	Does the Permittee monitor the temperature of incoming bulk loads? [PC J.4.(d)].	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	ii. Proper functioning of wind dispersal control system?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	iii. The presence of leachate in and proper functioning of leachate collection and removal systems?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
46.	Does the Permittee document compliance with PC J.5. in the operating record? [PC J.5.(d)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

**NOTE: Additional conditions of reporting requirements listed in OAC 3745-57-05(C)(2) are incorporated by reference.**

#### RESPONSE TO RELEASES

49.	Does the Permittee follow the RAP found in Volume 9, Appendix D.32 of the permit application, which contains procedures for detection, mitigating, notifying, and reporting leakage into the leak detection system present between the synthetic liners? [PC J.6.(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK# 40

51.	Has the Permittee notified the Ohio EPA on-site inspector and expeditiously repaired the damage upon discovery of a tear or puncture in the liner system? [PC J.6.(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. The contents of each landfill area, and each waste's approximate location within the landfill? [PC J.7.(a)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. The waste's identification cross referenced to the manifest document number? [PC J.7.(a)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Average and maximum wind speed? [PC J.7.(b)(ii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. Precipitation accumulated over the previous 24-hour period? [PC J.7.(b)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. Daily leachate level readings before and after any leachate removal from the systems? [PC J.7.(d)(iii)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	d. Daily volumes of leachate removed from the systems? [PC J.7.(d)(iv)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Are the procedures in the permit application followed? [PC J.9.]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	b. Does the waste and landfill meet all applicable requirements of OAC Chapter 3745-270? [PC J.9.]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	c. Is compliance with OAC Rule 3745-54-17(B) achieved? [PC J.9.]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Are containers 90 percent or greater full?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	i. Is the container very small, such as an ampule,	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	ii. Is the container designed to hold free liquids for use other than storage, such as a battery or capacitor, Or	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	iii. Is the container a lab pack as defined in OAC Rule 3745-57-16?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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**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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	<b>RMK# 42</b>
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**MODULE J - REMARKS:**

- 37. In 2006 ESOI completed the construction of the final cap on Phase 1 of Cell M. During 2007 ESOI seeded the final cap of Phase 1 of Cell M.
- 38. 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.  
  
P.C. J.2(s)(i) requires the Permittee to notify Ohio EPA on-site staff at least 3 days prior to the sampling event. ESOI failed to do this for the November 2008 and January 2009 (ESOI notified the on-site inspector the morning of the sampling event) Shelby Tube sampling events. During the January 2009 CEI exit interview ESOI committed to improving its notification process for Shelby Tube sampling.
- 39. During August 2007, ESOI demonstrated to Ohio EPA that the pumps in the PLCS are set to activate when leachate levels on the liner equal 8 inches or less (pumps activate at a transducer reading of 26").  
  
Since the November 2007 CEI ESOI has been cited for multiple violations of P.C. J.3(a) and violations of P.C. J.2(p).  
  
These violations were discussed during the December 11<sup>th</sup>, 2008, settlement meeting and they will be addressed through resolution of the proposed orders.
- 40. ESOI has not reported to Ohio EPA that they have observed enough leachate generation from the SLCS to implement the RAP for any of the sub-cells in Cell M.
- 41. Cell M remains active and is not closed. The final cap, including vegetative cover, is in place on Phase 1 of Cell M. During the 2008 construction season, ESOI completed cap construction, including vegetative cover, from the tie in at Phase 1 around the north and east sides of Phase 2 (to an elevation of approx. 650 ft.)
- 42. ESOI has not accepted F020, F021, F022, F023, F026, or F027 waste since the November 2007 CEI.

**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
2.	Was permission denied to maintain such a document by the library or did the terms required for such a depository become unreasonable? If yes, then:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Did the Permittee inform Ohio EPA and document such denial and/or circumstances? [PC L.1.]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
4.	Does the Permittee follow the surface water management plan for the entire facility as found in Volume 6, Appendix D.24 of the permit application? [PC L.3.]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# 43
5.	Have all other wells or borings that have been installed at the facility that are not addressed in Modules K or E been operated and maintained to perform to design specifications? [PC L.4.]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	a. When the above wells or borings are abandoned, are they plugged and abandoned in accordance with the <i>State of Ohio Technical Guidance for Sealing Unused Wells</i> (State Coordinating Committee on Ground Water, 1996) and <i>Ohio EPA's Technical Guidance Manual for Hydrogeologic Investigations and Ground Water Monitoring (1995)</i> ? [PC L.4.]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #

**END OF PERMIT CONDITIONS**

**MODULE L - REMARKS:**

43. During the January 2009 CEI exit interview, Ohio EPA noted that it continues to observe the surface water drainage ditch and storm water culverts on the east side of Cell M (along sub-cells M4 and M6) filling with sediment. During rain events, surface water continues to pond in this ditch and sediment continues to build up around the culverts. The condition of the surface water drainage ditch and culverts along the east side of Cell M did not meet the specifications described in Appendix D.24 of ESOI's Part B Permit Application.

During the 2008 construction season, under the monitoring and examination of MSG, Inc. personnel, ESOI removed the ramp along the south side of Cell M, decreased the slope both above and below the bench, and made significant improvements to the drainage ditch along the south side and near the southeast corner of Cell M.

ESOI's failure to maintain the surface water drainage ditches as outlined in the approved Part B Permit Application was discussed during the December 11, 2008, settlement meeting. This area of concern will be addressed through resolution of the proposed orders.

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

## LARGE QUANTITY GENERATOR REQUIREMENTS

### GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
2.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
3.	Were annual reports filed with Ohio EPA on or before March 1 <sup>st</sup> ? [3745-52-41]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<b>RMK# 17</b>

### WASTE IMPORT/EXPORT REQUIREMENTS

4.	Does the generator import or export hazardous waste? If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Has the generator notified U.S. EPA of export/import activity? [3745-52-53]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	b. Has the generator complied with special manifest requirements? [3745-52-54]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	d. Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	e. Are export related documents being maintained on-site? [3745-52-57]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Describe the unit(s) which the generator has closed.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #

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

**MANIFEST REQUIREMENTS**

You must start this part of the inspection by telling the company representative about the certification statement on the hazardous waste manifest using the following question and statement:

Are you aware of what the statement that you sign on the manifest says? Yes x No

If the answer is no, show them what the statement says using a signed manifest.

**NOTE:** While the statement is a certification that a P2 strategy is in place, signing the statement does not establish any legal obligations with which the company must comply. In other words, there is no violation of the hazardous waste rules if they sign the manifest and they don't have a program in place.

6.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
7.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

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

8.	Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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**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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
10.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
12.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. Type and amount of both introductory and continuing training to be given to each person filling a position?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	d. Documentation that personnel have completed the training or job experience required under 3745-65-16 (A)(B) & (C)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 22 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Emergency equipment?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. Emergency systems?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
16.	Does emergency training described in 3(a), (b) and (c) above include, <i>where applicable</i> : [3745-65-16(A)(3)(a-f)]				
	a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Key parameters for automatic waste feed cut-off systems?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. Communication or alarm system?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	d. Response procedures for fire/explosions?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	e. Response to groundwater contamination incidents?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	f. Shutdown procedures?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
17.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
19.	Does the generator provide annual refresher training to employees? [3745-65-16(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
20.	Are training records for current personnel kept until closure of the facility? [3745-65-16(E)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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.

<u>Job Performed</u>	<u>Name of Employee</u>	<u>Date(s) Trained</u>

**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Arrangements with emergency authorities? [3745-65-37]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

26.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure of the plan or as required by the Director? [3745-65-54]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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**EMERGENCY COORDINATOR**

27.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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**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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Was the contingency plan implemented? [3745-65-51(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Emergency communication device?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

	c. Portable fire control, spill control and decon equipment?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	d. Water of adequate volume/pressure?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
31.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
32.	Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
34.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
35.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
37.	Is the facility a metal finisher that generates waste water treatment sludge with a F006 waste code? If yes:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	b. The F006 waste is legitimately recycled through metals recovery.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	c. No more than 20,000 kg. of F006 is accumulated on-site at any one time.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	d. The facility complies with the applicable management standards for containers, tanks or containment buildings for LQGs.	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Are under the control of the operator of the process generating the waste?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. Do not exceed a total of 55 gallons of hazardous waste?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	d. Do not exceed one quart of acutely hazardous waste at any one time?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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	a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #

### USE AND MANAGEMENT OF CONTAINERS

40.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
41.	Is the accumulation date on each container? [3745-52-34(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
42.	Are hazardous wastes stored in containers which are:				
	a. Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
43.	Is the container accumulation area(s) inspected weekly? [3745-66-74] ( <i>Note location in general information section of checklist</i> )	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Are inspections recorded in a log or summary? [3745-66-74]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

### 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
46.	Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

47.	Before off-site transportation, does the generator placard <u>or</u> offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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**LQG REQUIREMENTS - REMARKS:**

17. (See Module B comment #17 on page 39) ESOI submitted their 2008 annual report on February 20, 2009.

**General Comment –**

During the January 2009 CEI exit interview, Ohio EPA provided ESOI with photographs of an unlabeled and open 5-gallon plastic pail containing used rags, PPE, and scrapings and a pile of used rags that Ohio EPA observed in the LSTB on January 21, 2009. ESOI explained that this waste was most likely generated either during the annual S-tank inspection [Permit Condition D.6(f)] between April and July 2008 or during the scraping and recoating of the S-tank secondary containment during September and October of 2008.

Following the exit interview, ESOI provided Material Safety Data Sheets (MSDS) for the high performance industrial enamel topcoat used to recoat the secondary containment of the S-tanks and MSDSs for the two-part (A+B) cycloaliphatic amine epoxy used to recoat the inside of the S-tanks. These MSDSs indicate that the scrapings from these products would not appear to be hazardous waste. ESOI also believes that the most likely source for the generation of this waste was the scraping and coating of the S-tank secondary containment in September and October of 2008.

ESOI must take steps to better follow the requirements of OAC Chapter 3745-52 for its on-site generated waste.

## 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
2.	Has the generator determined each EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2) see Table 1]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
3.	Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
4.	Does the generator generate a characteristic hazardous waste? If so:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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**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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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**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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment. [3745-270-05]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
11.	Does the facility have an extension to allow for a restricted waste to be land disposed? [3745-270-06] If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. The facility can land dispose of the waste. [3745-270-06]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
12.	Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Has the facility complied with 3745-270-04?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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## GENERATORS TREATING HAZARDOUS WASTE

19.	Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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20.	If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. A detailed chemical and physical analysis of a representative sample of the wastes being treated?[3745-270-07(A)(5)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
21.	Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
22.	Has the generator followed the facility's WAP [3745-270-07(A)(5)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
23.	Have the treated wastes met the applicable treatment standards in 3745-270-40?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
26.	Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	a. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	b. A description of the waste, including EPA hazardous waste codes and treatability group, and UHCs? [3745-270-09(D)(1)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #

**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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Has the notification and certification been updated in the generator's and treater's files? [3745-270-09(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #

	b. Has the director been notified of such changes? [3745-270-09(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
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**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
29.	Does each notification/certification form completed, contain the information found in Table 1? [3745-270-07(A)(3)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
32.	Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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	a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
34.	Is the waste a PCB waste under 40 CFR Part 761? If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	c. Technology used from Table 1? [3745-270-07(D)(1)(c)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
38.	Has the above notification been sent to the director? [3745-270-07(D)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
42.	Are wastes or treatment residues being sent to another TSD to be further managed? If so:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
43.	Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4)[3745-270-07(B)(6)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. The testing frequency specified in the facility's WAP and have they followed the protocol?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

**LDR INSPECTION - REMARKS:**

**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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- 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 <b>External Liner</b> [3745-66-93(E)(1)(a) - (1)(f)] If so,	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# 44
	i. Is liner designed or operated to contain 100% of the capacity of the largest tank?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	iii. Is liner free of cracks and gaps?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

	iv. Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	v. Are chemically resistant water stops in place at all joints? ( <i>concrete liners only</i> )	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	vi. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? ( <i>concrete liners only</i> )	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	b. <b>Vault System?</b> [3745-66-93(E)(2)(a) - (2)(f)] If so,	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	i. Is vault system designed to contain 100% of the capacity in the largest tank?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	ii. Is liner designed and operated to prevent run-on and infiltration or the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	iii. Are chemically resistant water stops in place at all joints?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	iv. Is there a compatible interior coating to prevent migration into the concrete?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	v. For <b>ignitable or reactive waste</b> : Is the vault system provided with means to prevent against the formation or ignition of vapors?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	vi. Is vault system provided with an exterior moisture barrier?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	c. <b>Double-Walled Tank?</b> [3745-66-93(E)(3)(a) - (3)(c)] If so,	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# 44
	i. Is double-walled tank designed as an integral structure to contain any release from the inner tank?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	ii. <b>If metal</b> , are the primary tank interior and outer shell exterior surfaces protected from corrosion?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
3.	Is the secondary containment system for the tank(s) an <u>equivalent device</u> as described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D)(E)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

**SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION [OAC 3745-66-93(B)(C)]**

4.	Has each secondary containment system been designed, installed and operated to prevent <u>any</u> migration of wastes or liquid to the soil, ground water, or surface water and is it capable of <u>detecting</u> and <u>collecting</u> releases and accumulated liquids? [3745-66-93(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Placed on a foundation or base capable of providing support?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	d. Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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)? <i>If not</i> , is the ancillary equipment:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Inspected daily? <b>AND</b> :	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	b. Is ancillary equipment one of the following:				
	i. Above ground piping (exclusive of flanges, joints, valves and connections)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	ii. Welded flanges, welded joints and/or welded connections?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	iii. Sealless or magnetic coupling pumps and/or sealless valves?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #

e. Proper support and protection of ancillary equipment? [3745-66-92(E)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
f. Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	a. Design standards? [3745-66-91(B)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	b. The characteristics of hazardous waste(s) that have been or will be handled? [3745-66-91(B)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	c. Corrosion protection measures? [3745-66-91(B)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	d. The age of the tank system has been estimated or documented? [3745-66-91(B)(4)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	e. A leak test has been conducted? (For non-enterable underground tanks) [3745-66-91(B)(5)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	f. A leak test or an internal inspection by qualified P.E. has been conducted? (For <u>other than non-enterable underground tanks and for ancillary equipment</u> ) [3745-66-91(B)(5)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	g. Is assessment certified by an independent, registered P.E.? [3745-66-91(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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(l)] <i>If so,</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	a. Have tests been certified by an independent, registered P.E.?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Above ground portion of tank (daily)? [3745-66-95(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. Data from leak detection equipment (daily)? [3745-66-95(A)(3)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	f. Where applicable, all sources of impressed current at least bi-monthly? [3745-66-95(B)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

**TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES [OAC 3745-66-98 AND 3745-66-99]**

15.	For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with <b>one of the following</b> : [3745-66-98(A)]				
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	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)]; <b>OR</b>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	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)]; <b>OR</b>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	c. The tank is used solely for emergencies? [3745-66-98(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	a. <i>If so</i> , have the requirements of 3745-65-17(B) been met?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	<b>RMK# 45</b>
	a. Conducted waste analysis and trial treatment or storage tests? [3745-66-100(A)]; <b>OR</b>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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? <i>If so</i> , did the o/o:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Immediately cease flow of material into tank and investigate the cause of the release? [3745-66-96(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	d. Immediately conduct a visual inspection of the release? [3745-66-96(C)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	e. Prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	f. Properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	h. Submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #

**NOTE:** *The requirements noted in 1.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.*

20.	In the event that the repairs to the tank system were major (replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from an independent, registered P.E. attesting that the repaired unit is capable of handling hazardous waste? [3745-66-96(F)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
22.	Does the o/o have a tank system <b>with a variance from secondary containment</b> from which a release has occurred but <u>has not</u> migrated beyond the zone of engineering control? <b>If so,</b>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Has the o/o complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	b. If soils cannot be contaminated/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
23.	Does the o/o have a tank system <b>with a variance from secondary containment</b> from which a release occurred and <u>has</u> migrated from the zone of engineering control? <b>If so,</b>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #

**TANK SYSTEM REQUIREMENTS - REMARKS:**

44. 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.

**TANK SYSTEM REQUIREMENTS – REMARKS cont.:**

45. 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.

**General Comment –**

ESOI has not constructed New Tanks S-4, S-5, S-6 or S-7 since the date of the last CEI. During March 2009, ESOI purchased and placed a 20,000-gallon storage tank in Storage Area K for the storage of hazardous waste liquids collected by ESOI's on-site vacuum tankers (primarily F039, K061). ESOI determined this tank exceeded the capacity of the secondary containment in Area K and could not be placed into service (OAC Rule 3745-66-93). Ohio EPA requested ESOI to submit a class determination request so that the Agency could consider the placement of this 20,000-gallon tank in Area O inside Cell M. As an alternative, ESOI is considering placing one or two 10,000-gallon storage tanks in Storage Area K.

## USED OIL INSPECTION CHECKLIST (Short Version)

### PROHIBITIONS

1.	Is used oil being managed in a surface impoundment or waste pile? If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. 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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
2.	Is used oil being used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
3.	Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK # 46
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]				
	a. Stopped the release?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	b. Contained the release?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	c. Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #

10.	Does the generator burn used oil in used fired space heaters? [3745-279-23] If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	c. Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# 47

**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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
13.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #

**WASTE EVALUATION**

15.	Have all wastes generated at the facility been evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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**USED OIL INSPECTION - REMARKS:**

- 46. During the inspection conducted on January 20, 2009, Ohio EPA observed the label on the reservoir tank in Building C was not clearly marked. ESOI should replace this label.
- 47. ESOI's used oil is transported off-site by DISC Environmental Service, Inc.

## SMALL QUANTITY UNIVERSAL WASTE CHECKLIST

### PROHIBITIONS

1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK# 48
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK# 48
5.	Does the SQUWH conduct any of the following activities:				
	a. Sort batteries by type?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# 49
	b. Mix battery types in one container?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	c. Discharge batteries to remove the electric charge?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	d. Regenerate used batteries?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# 49
	e. Disassemble them into individual batteries or cells?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	f. Remove batteries from consumer products?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	g. Remove the electrolyte from the battery?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #

7.	Are the battery(ies) or container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-14(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK# 50
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### 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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
15.	If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	a. Remove the ampules in a manner to prevent breakage and are they removed over or in a containment device? [3745-273-3(C)(2)(a)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	d. Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #

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

**ACCUMULATION TIME**

21.	Is the waste accumulated for less than one year? [3745-273-15(A)] If not:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <b>one</b> of the following: [3745-273-15(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
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### RESPONSE TO RELEASES

24.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
25.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
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**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK# 51
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**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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
29.	Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	b. Agree to where the shipment will be sent? [3745-273-18(E)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
31.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Sending the waste back to the originating handler? [3745-273-18(F)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
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**EXPORTS**

34.	Is waste being sent to a foreign destination? If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	RMK #
	a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	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 <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #
	c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	RMK #

**SMALL QUANTITY UNIVERSAL WASTE HANDLER - REMARKS:**

- 48. ESOI indicates that they do sometimes see leakage from the batteries they are recharging. Batteries that show evidence of leakage from this charging activity should be properly contained per OAC 3745-273-13(A)(1).
- 49. ESOI generates universal waste lead acid batteries from on-site equipment. These batteries are stored in a room in Building C. ESOI is labeling batteries that are being recharged/stored for recharging. Batteries that ESOI is no longer charging are being marked with the month/year that they are used/"out of service".
- 50. Batteries that ESOI has identified as being used/"out of service" should be labeled per OAC 3745-273-14(A) and containerized appropriately. ESOI's used batteries are picked up by D&J Supply, 1929 Star Avenue, Toledo, Ohio. D&J Supply sells ESOI replacement batteries.
- 51. Green-tipped (low mercury) fluorescent lamps that ESOI generates are disposed of in the trash. High mercury fluorescent lamps are managed as universal waste and are shipped to a universal waste handler (Safety Kleen). ESOI stores universal waste lamps in the "Telephone Room" in Building C.