OhioEPA

State of Ohio Environmental Protection Agency

Southeast District Office

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

January 16, 2007

ATHENS COUNTY
GENERAL FILE
(TENNESSEE GAS PIPELINE)
DHWM/SEDO
OHD079432522

Mr. Scott J. Lewis
Tennessee Gas Pipeline Company
1211 Greenville Mercer Road
Mercer, PA 16137

Dear Mr. Lewis:

On December 19, 2006 and December 29, 2006, I inspected Tennessee Gas Pipeline's Station 204 in Albany, Ohio to determine Tennessee Gas Pipeline's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC).

This letter will explain the violations identified during the inspection, what you need to do to correct the violations, other general comments, and what you need to do to respond to the comments.

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

Violations

(1) ***OAC Rule 3745-279-22(C)(1), Used Oil Storage Requirements:*** Containers and above ground tanks used to store used oil at generator facilities shall be labeled or marked clearly with the words, "Used Oil." At the time of the December 19, 2006 inspection, the 55-gallon drum being used in the Pipeline Shop to collect used oil from the oil filter crusher was not labeled with the words, "Used Oil" as required.

When I returned to the facility on December 29, 2006, the used oil container had been properly labeled with the words "Used Oil," abating this violation. Tennessee Gas Pipeline is returned to compliance with this rule, no further action is necessary.

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

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 (740) 380-5248. You can find copies of the rules and other information on the division's web page at http://www.epa.state.oh.us/dhwm/. Information about pollution prevention is also available at http://www.epa.state.oh.us/ocapp/ocapp.html.

Sincerely,

Elizabeth A. Herron
Environmental Specialist
Division of Hazardous Waste Management

EAH/mlm

Enclosures

cc: Mark C. Ervin, Tennessee Gas Pipeline

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

E-mail this completed form to tammy.mcconnell@epa.state.oh.us or mail it to Tammy McConnell, Central Office	Ohio Environmental Protection Agency **RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM**	For Ohio EPA use only

2. Site EPA ID No.	**EPA ID Number:** OHD079432522							
3. Site Name	**Name:** Tennessee Gas Pipeline - Station 204					**Website (optional:)**		
4. Site Location Information	**Street Address:** 2335 US 50 West							
	City, Town, or Village: Albany					**State:** OH		
	County Name: Athens					**Zip Code:** 45710		
5. Site Land Type (check only one)	**Private**	**County**	**District**	**Federal**	**Indian**	**Municipal**	**State**	**Other**
	x							
6. NAICS code(s) www.census.gov/epcd/www/naics.html	**A.**			**B.**				
	C.			**D.**				
7. Facility Representative: Additional names can be recorded in number 12. Only provide address information if it is different than the site address.	**First Name:** Scott			**MI:** J		**Last Name:** Lewis		
	Phone Number: 724 662-6436					**Phone Number Extension:**		
	E-Mail Address: scott.lewis@elpaso.com							
	Fax Number: 724 662-6484					**Fax Number Extension:**		
	Street or P.O. Box: 1211 Greenville Mercer Road							
	City, Town or Village: Mercer							
	State: PA			**Country:** USA		**Zip Code:** 16137		
8. Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	**A. Name of Site's Legal Owner:** Elpaso Pipeline Group					**Date Became Owner (mm/dd/yyyy):**		
	Owner Type: Mark with an X	**Private**	**County**	**District**	**Federal**	**Indian**	**Municipal**	**State**	**Other**
		x							
	Street or P.O. Box:								
	City, Town, or Village:					**Owner Phone #:**			
	State:				**Country:**		**Zip Code:**		
	B. Name of Site's Operator:					**Date Became Operator (mm/dd/yyyy):**		
	Operator Type: Mark with an X	**Private**	**County**	**District**	**Federal**	**Indian**	**Municipal**	**State**	**Other**
	Street or P.O. Box:								
	City, Town, or Village:					**Operator Phone #:**			
	State:				**Country:**		**Zip Code:**		

9. Violations Cited?	X	Yes		No

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

	Not Regulated

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

A. Hazardous Waste Activities

(choose only one of the following categories)

- [ ] **UNKNOWN:** Cited for violation of 3745-52-11
- [x] a. **Large Quantity Generator (LQG):**
- [ ] b. **Small Quantity Generator (SQG)**
- [ ] c. **Conditionally Exempt Small Quantity Generator**
- [ ] d. **United States Importer of Hazardous Waste**
- [ ] e. **Mixed Waste (hazardous and radioactive) Generator**
- [ ] **3. Treater, Storer or Disposer of Hazardous Waste**
- [ ] **4. Recycler of Hazardous Waste**
- [ ] **5. Exempt Boiler and/or Industrial Furnace**
  - [ ] a. Small Quantity On-site Burner Exemption
  - [ ] b. Smelting, Melting, Refining Furnace Exemption
- [ ] **6. Underground Injection Control Facility**

B. Universal Waste Activities

- [x] **1. Small Quantity Handler of Universal Waste**

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

- [ ] **2. Large Quantity Handler of Universal Waste**

(accumulates 5,000 kg or more).

- [ ] **3. Destination Facility for Universal Waste**

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

	Generated	Accumulated
A. Batteries		
B. Pesticides		
C.Thermostats		
D. Lamps	X	X

C. Used Oil Activities

- [x] **1. Used Oil Generator**
- **2. Used Oil Transporter Indicate Type(s) of Activity(ies)**
  - [ ] Transporter
  - [ ] Transfer Facility
- **3. Used Oil Processor and/or Re-refiner**

Indicate Type(s) of Activity(ies)

- [ ] **Processor**
- [ ] **Re-refiner**

- [ ] **4. Off-Specification Used Oil Burner**
- **5.** Used Oil Fuel Marketer -

Indicate Type(s) of Activity(ies)

- [ ] a. Marketer Who Directs Shipment of Off- Specification Oil
- [ ] b. Used Oil to Off-Specification Used Oil Burner

11. Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.

D001	D008	D018				

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

No	Announced ?	Additional Facility Representatives:	Marty Wyant (12-19-06) and Mark Ervin (12-29-06)
Yes	Tanks?	Other comments: Initial inspection done on 12-19-06 was not announced, 12-29-06 follow up was scheduled	
Yes	Containers?		

13. Name of Inspector(s)	Name of Inspector(s)	Date of Inspection/ Time (mm-dd-yyyy) (HH:MM)
Elizabeth Herron		12-29-06 10AM - 1 PM

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

Signature of owner, operator, or an authorized representative	Name and Title (Print)	Date (mm-dd-yyyy)

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: Tennessee Gas Pipeline **Facility Type:** LQG **EPA ID#:** OHD079432522

Description of Waste				On-Site Management			Off-Site Management
	Process/Activity Generating Waste (e.g. plating bath, machining, baghouse, painting, etc)	**Waste Generated** (e.g. sludge, spent solvent, ash, etc)	**EPA Waste Code**	**QTY Generated**	**Type of Accumulation/ Storage** (e.g. container, tank, etc)	**Type of On-Site Treatment** (recycle, wwt, etc)	**Waste Location** (see attached map)	**Name, state, and *type of activity occurring at the facility.***
1	Sandblasting old paint off of gas transmission lines	Spent sandblast media	D008	In 2006, four 20 yd. Roll-off boxes were generated by the re-painting of the transmission lines at the facility	20 yd. Roll-off boxes	Not applicable	The roll-off boxes were stored in the grassy area southeast of the compressor building, north of the condensate and used oil and storage tanks	Clean Harbors Spring Grove, OH
2	Collection of condensate from 3 pipe drip stations	Pipeline condensate	off-specification fuel, not a hazardous waste	3,000 gallons total generated twice per year	3,000 gallon tank	Not applicable	located Southeast of the compressor building, next to the used oil tank	Norlite Corporation Cohoes, New York Burned for energy recovery
3	Compressor engines in the compressor station and crushing of oil filters	Used oil	On-spec.	1,300 gallons total in 2005, oil is changed when indicated by the filter differential pressure	3,000 gallon tank and 55-gallon drums	Not applicable	Tank is located Southeast of the compressor building, next to the pipeline condensate tank Drums are used in the Pipeline Shop to collect used oil from the filter crusher	Safety-Kleen Groveport, OH marketing
4	Cleanout of gas transmission pipes	Pipe sludge	D018	50- 100 pounds per year	55-gallon drums	Not applicable	Drum storage building, which is located west of the other site buildings and near the lake	Clean Harbors Spring Grove, OH Burned for energy recovery

5	Lighting	Fluorescent lamps, 4 and 8 foot	Universal waste	varies	Cardboard containers	Not applicable	Shop building loft	Clean Harbors Spring Grove, OH recycled
6	Backup batteries	batteries	Exempt OAC Rule 3745-266-80	100-150 pounds per year	pallet	Not applicable	Drum storage building*	Clean Harbors Spring Grove, OH recycled
7	Parts washers	Spent solvent	D001	No generation in the last 3 years	Not applicable	Not applicable	One parts washer in the Shop Building and one in the Pipeline Shop	Safety-Kleen Groveport, OH
8	Miscellaneous Painting of equipment	Paint waste	Waste codes vary, disposed of as a lab pack	Facility was in the process of doing a clean out of their paint storage area at the time of the inspection, two 55-gallon drums had been generated	55-gallon drums	Not applicable	Drum storage building	Not yet manifested. Facility plans have Clean Harbors collect the waste.

* On the initial December 19, 2006 inspection, the batteries were being stored in the outdoor covered storage area of the construction building. At the December 29, 2006, follow-up visit the batteries had been moved to the drum storage building which is where Tennessee Gas plans to store them from now on.

REMARKS-GENERAL INFORMATION

General Process Information

Tennessee Gas Pipeline has an underground natural gas transmission line from the Gulf of Mexico to the Northeastern United States. This transmission line is actually 4 pipelines which run parallel to one another. In order to move the gas through the lines it has to be pressurized. The pressurization is done at compressor stations, which are spaced approximately every 75 miles along the line. The Tennessee Gas Pipeline Station 204 in Albany, Ohio is one such station. The facility has a set of 12 compressors housed in the compressor building. If the gas in the line still has enough pressure to continue moving when it reaches the compressor station then it passes through without being re-pressurized. Tennessee Gas Pipeline Station 204 has not been needed since August 2006, so the compressors have not been run since then.

The lines between stations are cleaned using "pigs" which are sent through the line to remove accumulated pipe sludge. The pigs can also be fitted with electronics that are used to monitor the pipeline integrity. The pipe sludge is a hazardous waste for benzene.

The section of pipeline that is maintained by Station 204 has three drip gas collection points. The pipeline condensate is collected using a portable tank that can be truck mounted. The condensate is then stored in a 3,000 gallon tank located at the station. The condensate has a high Btu value and transported to Norlite Corporation where it is burned for energy recovery. The condensate is classified as an off-specification fuel and therefore is not regulated as a hazardous waste when it is burned for energy recovery. During 2006 no pipeline condensate was generated since the compressor station has not been used since August 2006.

During 2006 Tennessee Gas Pipeline Station 204 was repainting the portion of transmission line that is above ground at the facility. Before the painting was done the piping was sandblasted to remove the old paint. The waste sandblast material is reportedly hazardous for lead. Four 20 yard roll-off boxes of waste were reportedly generated. On December 19, 2006, when the first inspection visit was made to the facility, one 20 yard roll-off box containing sandblast material was being stored on-site. Next to the roll-off box were piles of sandblast material. A tarp was under the piles but they were not covered. At the December 29, 2006 follow up visit the first roll-off box had been removed for disposal and the two piles of sandblast material had been placed in a second roll-off box. The ground surface where the piles had been stored had been scraped with a backhoe and the soil was put into the roll-off box.

Regulatory/Enforcement History

Tennessee Gas Pipeline Station 204 has not been previously inspected for hazardous waste.

LARGE QUANTITY GENERATOR REQUIREMENTS

CESQG:< 100 Kg. (approximately 25-30 gallons) of waste in a calendar month

SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month

LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or > 1 Kg. of acutely hazardous waste in a calendar month

NOTE: *To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds*

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] — Yes ✓ No ❑ N/A ___ RMK#___

2. Has the generator obtained a U.S. EPA identification number? [3745-52-12] — Yes ✓ No ❑ N/A ___ RMK#___

3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41] — Yes ___ No ❑ N/A ✓ RMK# 1

WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? If so: — Yes ___ No ✓ N/A ___ RMK#___

   a. Has the generator notified U.S. EPA of export/import activity? [3745-52-53] — Yes ___ No ❑ N/A ✓ RMK#___

   b. Has the generator complied with special manifest requirements? [3745-52-54] — Yes ___ No ❑ N/A ✓ RMK#___

   c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] — Yes ___ No ❑ N/A ✓ RMK#___

   d. Has an annual report been submitted to U.S. EPA? [3745-52-56] — Yes ___ No ❑ N/A ✓ RMK#___

   e. Are export related documents being maintained on-site? [3745-52-57] — Yes ___ No ❑ N/A ✓ RMK#___

GENERATOR CLOSURE REQUIREMENTS

5. Has the generator closed any <90-day accumulation unit(s) since the date of the last inspection? If so: — Yes ___ No ✓ N/A ___ RMK#___

a. Describe the unit(s) which the generator has closed.

b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] Yes ___ No ☐ N/A ✓ RMK#___

c. Please provide a description of the documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standards.

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]

REMARKS

1.) Facility was not a large quantity generator in 2005. An annual report will be required March 2007 for waste generated in 2006.

MANIFEST REQUIREMENTS

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

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

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

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

1. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] — Yes ✓ No ❑ N/A ___ RMK#___

2. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] — Yes ✓ No ❑ N/A ___ RMK#___

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

3. Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)] — Yes ✓ No ❑ N/A ___ RMK#___

NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].

4. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: — Yes ___ No ✓ N/A ___ RMK#___

   a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] — Yes ___ No ❑ N/A ✓ RMK#___

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

6. Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not: — Yes ✓ No ___ N/A ___ RMK#___

a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)] Yes ___ No ❑ N/A ✓ RMK#___

b. If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] Yes ___ No ❑ N/A ✓ RMK#___

7. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] Yes ✓ No ❑ N/A ___ RMK#___

NOTE: *Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.*

REMARKS

PERSONNEL TRAINING

1. Does the generator keep records required by 3745-65-16(D) including:

   a. Job titles, as they relate to hazardous waste management, and the name of each employee filling each job? — Yes ✓ No ❑ N/A ___ RMK#___

   b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position? — Yes ✓ No ❑ N/A ___ RMK#___

   c. Type and amount of both introductory and continuing training to be given to each person filling a position? — Yes ✓ No ❑ N/A ___ RMK#___

   d. Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)? — Yes ✓ No ❑ N/A ___ RMK#___

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

2. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2) — Yes ✓ No ❑ N/A ___ RMK# 2

3. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]

   a. Emergency procedures? — Yes ✓ No ❑ N/A ___ RMK#___

   b. Emergency equipment? — Yes ✓ No ❑ N/A ___ RMK#___

   c. Emergency systems? — Yes ✓ No ❑ N/A ___ RMK#___

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

   a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? Yes ✓ No ❑ N/A ___ RMK#___

   b. Key parameters for automatic waste feed cut-off systems? Yes ✓ No ❑ N/A ___ RMK#___

   c. Communication or alarm system? Yes ✓ No ❑ N/A ___ RMK#___

   d. Response procedures for fire/explosions? Yes ✓ No ❑ N/A ___ RMK#___

   e. Response to groundwater contamination incidents? Yes ✓ No ❑ N/A ___ RMK#___

   f. Shutdown procedures? Yes ✓ No ❑ N/A ___ RMK#__

5. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes ✓ No ❑ N/A ___ RMK#___

6. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes ✓ No ❑ N/A ___ RMK#___

7. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes ✓ No ❑ N/A ___ RMK#___

8. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)] Yes ✓ No ❑ N/A ___ RMK#___

9. Are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes ✓ No ❑ N/A ___ RMK#___

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

Job Performed	**Name of Employee**	**Date(s)Trained**

REMARKS

2.) Tennessee Gas Pipeline has an on-line training program for their employees, which is done yearly.

CONTINGENCY PLAN

1. Does the generator have a contingency plan which describes the following: [3745-65-52(A) through (F)]

   a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? — Yes ✓ No ❑ N/A ___ RMK#___

   b. Arrangements with emergency authorities? [3745-65-37] — Yes ✓ No ❑ N/A ___ RMK#___

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

   d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? — Yes ✓ No ❑ N/A ___ RMK#___

   e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary? — Yes ✓ No ❑ N/A ___ RMK#___

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

2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] — Yes ✓ No ❑ N/A ___ RMK#___

3. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)(B)] — Yes ✓ No ❑ N/A ___ RMK#___

4. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] — Yes ✓ No ❑ N/A ___ RMK# 3

EMERGENCY COORDINATOR

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

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

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes ___ No ✓ N/A ___ RMK#___

   a. Was the contingency plan implemented? [3745-65-51(B)] Yes ___ No ☐ N/A ✓ RMK#___

   b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes ___ No ☐ N/A ✓ RMK#___

   c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes ___ No ☐ N/A ✓ RMK#___

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

REMARKS

3.) The Emergency Operations and Procedures plan is updated quarterly.

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

1. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] — Yes ✓ No ❑ N/A ___ RMK#___

2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]

   a. Internal alarm system? — Yes ✓ No ❑ N/A ___ RMK# 4

   b. Emergency communication device? — Yes ✓ No ❑ N/A ___ RMK# 4

   c. Portable fire control, spill control and decon equipment? — Yes ✓ No ❑ N/A ___ RMK#___

   d. Water of adequate volume/pressure? — Yes ✓ No ❑ N/A ___ RMK#___

3. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] — Yes ___ No ❑ N/A ___ RMK#___

4. Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33] — Yes ___ No ❑ N/A ___ RMK#___

5. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32)*? [3745-65-34] — Yes ✓ No ❑ N/A ___ RMK#___

6. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] — Yes ✓ No ❑ N/A ___ RMK#___

7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] — Yes ✓ No ❑ N/A ___ RMK#___

   a. Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)] — Yes ___ No ❑ N/A ✓ RMK#___

REMARKS

4.) The facility uses a horn blast system for signaling, and cell phones and radios for emergency communication.

GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)] — Yes ❑ No ✓ N/A ___ RMK#___

2. Is the facility a metal finisher that generates waste water treatment sludge with a F006 waste code? If yes: — Yes ___ No ✓ N/A ___ RMK#___

NOTE: If yes, they may accumulate F006 waste on-site for up to 180 days; or up to 270 days if they must transport the F006 waste over 200 miles for off-site metals recovery; without an Ohio hazardous waste permit, provided that they meet these special conditions (OAC 3745-52-34(G) and (H)):

a. The generator has implemented pollution prevention practices that reduce the amount of any hazardous substances, pollutants or contaminants entering F006 or otherwise released to the environment prior to its recycling (see your P2 coordinator for a copy of Federal Register 3/00 for a listing of examples of P2 measures, the facility should be prepared to demonstrate this request); — Yes ___ No ❑ N/A ✓ RMK#___

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

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

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

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

3. Does the generator ensure that satellite accumulation area(s):

a. Are at or near a point of generation? — Yes ___ No ❑ N/A ✓ RMK#___

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

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

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

e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? — Yes ___ No ☐ N/A ✓ RMK#___

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation. The inspector should refer to Guidance Document #DHWM-008, Satellite Accumulation Under Ohio Hazardous Waste Rules.

4. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so: — Yes ___ No ___ N/A ✓ RMK#___

a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? — Yes ___ No ☐ N/A ✓ RMK#___

b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? — Yes ___ No ☐ N/A ✓ RMK#___

USE AND MANAGEMENT OF CONTAINERS

5. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] — Yes ✓ No ☐ N/A ___ RMK#___

6. Is the accumulation date on each container? [3745-52-34(A)(2)] — Yes ✓ No ☐ N/A ___ RMK#___

7. Are hazardous wastes stored in containers which are:

a. Closed (except when adding/removing wastes)? [3745-66-73(A)] — Yes ✓ No ☐ N/A ___ RMK#___

b. In good condition? [3745-66-71] — Yes ✓ No ☐ N/A ___ RMK#___

c. Compatible with wastes stored in them? [3745-66-72] — Yes ✓ No ☐ N/A ___ RMK#___

d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] — Yes ✓ No ❑ N/A ___ RMK#___

8. Is the container accumulation area(s) inspected weekly? [3745-66-74] (*Note location in general information section of checklist)* — Yes ___ No ❑ N/A ___ RMK#___

a. Are inspections recorded in a log or summary? [3745-66-74] — Yes ✓ No ❑ N/A ___ RMK#___

9. For ignitable and/or reactive hazardous waste(s):

a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] — Yes ✓ No ❑ N/A ___ RMK#___

b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] — Yes ✓ No ❑ N/A ___ RMK#___

PRE-TRANSPORT REQUIREMENTS

10. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] — Yes ✓ No ❑ N/A ___ RMK#___

11. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] — Yes ✓ No ❑ N/A ___ RMK#___

12. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] — Yes ✓ No ❑ N/A ___ RMK#___

REMARKS

USED OIL INSPECTION CHECKLIST (Short Version)

NOTE: ***This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.***

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: — Yes__ No ✔ N/A ___ RMK#__

   Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-12(A)] — Yes ___ No ❑ N/A ✔ RMK#___

2. Is used oil being used as a dust suppressant? [3745-279-12(B)] — Yes ❑ No ✔ N/A ___ RMK#__

3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12©? — Yes ___ No ❑ N/A ✔ RMK#___

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)] — Yes ___ No ❑ N/A ✔ RMK#___

5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] — Yes ___ No ❑ N/A ✔ RMK#___

6. Does the generator only store used oil in tanks, containers, or units subject to OAC 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-22(A)] — Yes ✔ No ❑ N/A ___ RMK#___

7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)] — Yes ✔ No ❑ N/A ___ RMK#___

8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22©] — Yes ____ No ■ N/A ___ RMK# 5

9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]

   a. Stopped the release? — Yes ___ No ❑ N/A ✔ RMK#___

   b. Contained the release? — Yes ___ No ❑ N/A ✔ RMK#___

c. Cleaned up and properly managed the used oil and other materials? — Yes ___ No ☐ N/A ✔ RMK#___

d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? — Yes ___ No ☐ N/A ✔ RMK#___

10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: — Yes___No___ N/A ✔ RMK#___

a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators? — Yes ___ No ☐ N/A ✔ RMK#___

b. Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour? — Yes ___ No ☐ N/A ✔ RMK#___

c. Are the combustion gases from heater vented to the ambient air? — Yes ___ No ☐ N/A ✔ RMK#___

11. Does the generator have the used oil hauled only by transporters that have obtained U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] — Yes ___ No ☐ N/A ✔ RMK#___

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30] — Yes ___ No ☐ N/A ✔ RMK#___

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

14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32] — Yes ___ No ☐ N/A ✔ RMK#___

WASTE EVALUATION

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

REMARKS

5) On December 19, 2006, the drum being used in the Pipeline Shop to collect used oil from the oil filter crusher was not labeled with the words "used oil."

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

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

PROHIBITIONS

1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes ☐ No ✔ N/A ___ RMK#___
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)]	Yes ☐ No ✔ N/A ___ RMK#___

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE LAMPS

3.	Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]	Yes ___ No ■ N/A___ RMK# 7
4.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes ___ No ☐ N/A ✔ RMK#___
5.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)]	Yes ___ No ■ N/A ___ RMK# 7

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.

b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] — Yes__ No__ N/A ✔ RMK#___

16. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following: — Yes __ No ❑ N/A ✔ RMK#___

a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] — Yes__ No__ N/A ✔ RMK#___

b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] — Yes__ No__ N/A ✔ RMK#___

17. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)] — Yes __ No ❑ N/A ✔ RMK#___

18. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)] — Yes __ No ❑ N/A ✔ RMK#___

EXPORTS

19. Is waste being sent to a foreign destination? If so: — Yes__ No ✔ N/A ___RMK#___

a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)] — Yes __ No ❑ N/A ✔ RMK#___

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)] — Yes __ No ❑ N/A ✔ RMK#___

c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] — Yes __ No ❑ N/A ✔ RMK#___

REMARKS

7.) At the time of the December 19, 2006 inspection, lamps were stored in an open trash can. The container had not been labeled as a universal waste or marked in a way that would allow documentation of the length of time waste is stored.

LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] **If so**: Yes ✓ No ☐ N/A ___ RMK#___

   a. **For determinations based solely on knowledge of the waste:** Is supporting data retained on-site? [3745-270-07(A)(6)] Yes ✓ No ☐ N/A ___ RMK#___

   b. **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes ✓ No ☐ N/A ___ RMK#___

2. Has the generator determined each Ohio EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2), see Table 1] Yes ✓ No ☐ N/A ___ RMK#___

3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes ✓ No ☐ N/A ___ RMK#___

4. Does the generator generate a characteristic hazardous waste? **If so:** Yes ✓ No ___ N/A ___ RMK#___

   a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes ✓ No ☐ N/A ___ RMK#___

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

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] **If so:** Yes ___ No ___ N/A ✓ RMK#___

   a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes ___ No ☐ N/A ✓ RMK#___

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

6. Has the generator **correctly** determined if restricted wastes meet or exceed treatment standards? [3745-270-07(A)(1)] Yes ✓ No ☐ N/A ___ RMK#___

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] Yes ✓ No ☐ N/A ___ RMK#___

NOTE: *A generator may dilute a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit (§402 of CWA), that treats waste in a CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non-wastewater.*[3745-270-03(B)]

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] Yes ☐ No ✓ N/A ___ RMK#___

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes ☐ No ✓ N/A ___ RMK#___

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

    a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05]

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] **If so:** Yes ___ No ✓ N/A ___ RMK#___

    a. The facility can land dispose of the waste. [3745-270-06]

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

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

NOTIFICATION AND CERTIFICATION REQUIREMENTS

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

2. 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? [3745-270-07(A)(3)] — Yes ✓ No ❑ N/A ___ RMK#___

3. 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? [3745-270-07(A)(4)] — Yes ___ No ❑ N/A ✓ RMK#___

4. 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? [3745-270-07(A)(9)] — Yes ___ No ❑ N/A ✓ RMK# 6

5. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] **If so:** — Yes ___ No ___ N/A ✓ RMK#___

   a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] — Yes ___ No ❑ N/A ✓ RMK#___

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

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

REMARKS

6.) Lab pack waste had been generated but not yet manifested off-site at the time of the inspection.

GENERATORS TREATING HAZARDOUS WASTE

1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40? Yes___ No___ N/A ✓ RMK#___

2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)] Yes___ No ❑ N/A ✓ RMK#___

   a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)] Yes ___ No ❑ N/A ✓ RMK#___

   b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] Yes ___ No ❑ N/A ✓ RMK#___

3. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] Yes ___ No ❑ N/A ✓ RMK#___

4. Have the treated wastes met the applicable treatment standards in 3745-270-40? Yes ___ No ❑ N/A ✓ RMK#___

NOTE: *If the waste is a characteristic waste, which has been treated to render it non hazardous and subsequently sent to a solid waste landfill, proceed to question 7 & 8.*

5. Has the generator sent a notification and certification with the initial shipment of waste?[3745-270-07(A)(5)(c)] Yes ____No ❑ N/A ✓ RMK#___

6. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)] Yes ____No ❑ N/A ✓ RMK#___

7. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following: Yes ___No ❑ N/A ✓ RMK#___

   i. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes ___No ❑ N/A ✓ RMK#___

   ii. A description of the waste, including EPA hazardous waste numbers and treatability group, and UHCs? [3745-270-09(D)(1)(b)] Yes ___No ❑ N/A ✓ RMK#___

NOTE: *If the waste will be treated and monitored for **all** UHCs then they do not need to be listed on the notice.*

8. Has the process/operation generating the waste or the solid waste landfill facility changed? If so: Yes____No____N/A ✓RMK#___

   a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)] Yes ____No ❑ N/A ✓RMK#___

   b. Has the director been notified of such changes? [3745-270-09(D)] Yes ____No ❑ N/A ✓RMK#___

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

9. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: Yes____No____N/A ✓RMK#___

   a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49(C)] Yes ____No ❑ N/A ✓RMK#___

10. Does each notification/certification form completed, contain the information found in Table1? [3745-270-07(A)(3)] Yes ____No ❑ N/A ✓RMK#___

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

HAZARDOUS DEBRIS

1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)? Yes____No___ N/A ✓RMK#___

2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.) Yes____No___ N/A ✓RMK#___

3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so: Yes____No___ N/A ✓RMK#___

   a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)] Yes ____No ❑ N/A ✓RMK#___

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

4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so: Yes____No__ N/A ✓ RMK#___

   a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)] Yes____No ❑ N/A ✓ RMK#___

5. Is the waste a PCB waste under 40 CFR Part 761? If so: Yes____No____N/A ✓ RMK#___

   a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 270? [3745-270-45(A)(5)] Yes ____No ❑ N/A ✓ RMK#___

6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)] Yes ____No ❑ N/A ✓ RMK#___

7. Does the owner/operator of a treatment facility that claims the debris is excluded under 3745-51-03(F)(1) maintain the following information?

   a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)] Yes____No___N/A ✓ RMK#___

   b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)] Yes ____No ❑ N/A ✓ RMK#___

   c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)] Yes ____No ❑ N/A ✓ RMK#___

8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F) have the following information? [3745-270-07(D)(3)] Yes ____No ❑ N/A ✓ RMK#___

   a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)] Yes ____No ❑ N/A ✓ RMK#___

   b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)] Yes ____No ❑ N/A ✓ RMK#___

c. Technology used from Table 1? [3745-270-07(D)(1)(c)] Yes ___ No ❑ N/A ✓ RMK#___

9. Has the above notification been sent to the director? [3745-270-07(D)(1)] Yes ___ No ❑ N/A ✓ RMK#___

TREATING FACILITIES

1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-14?[3745-270-07(B)] Yes ___ No ❑ N/A ✓ RMK#___

2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)] Yes ___ No ❑ N/A ✓ RMK#___

Note: *No further notification is necessary until such time that the waste changes or the receiving facility changes.*

3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07?[3745-270-07(B)(3)] Yes ___ No ❑ N/A ✓ RMK#___

4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so**: Yes___ No___ N/A ✓ RMK#___

   a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)] Yes ___ No ❑ N/A ✓ RMK#___

5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-58-30? **If so:** Yes___ No___ N/A ✓ RMK#___

   a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)], excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)] Yes___ No ❑ N/A ✓ RMK#___

   b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4)[3745-270-07(B)(6)] Yes ___ No ❑ N/A ✓ RMK#___

   c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B))(6)] Yes ___ No ❑ N/A ✓ RMK#___

6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)] Yes ___ No ❑ N/A ✓ RMK#___

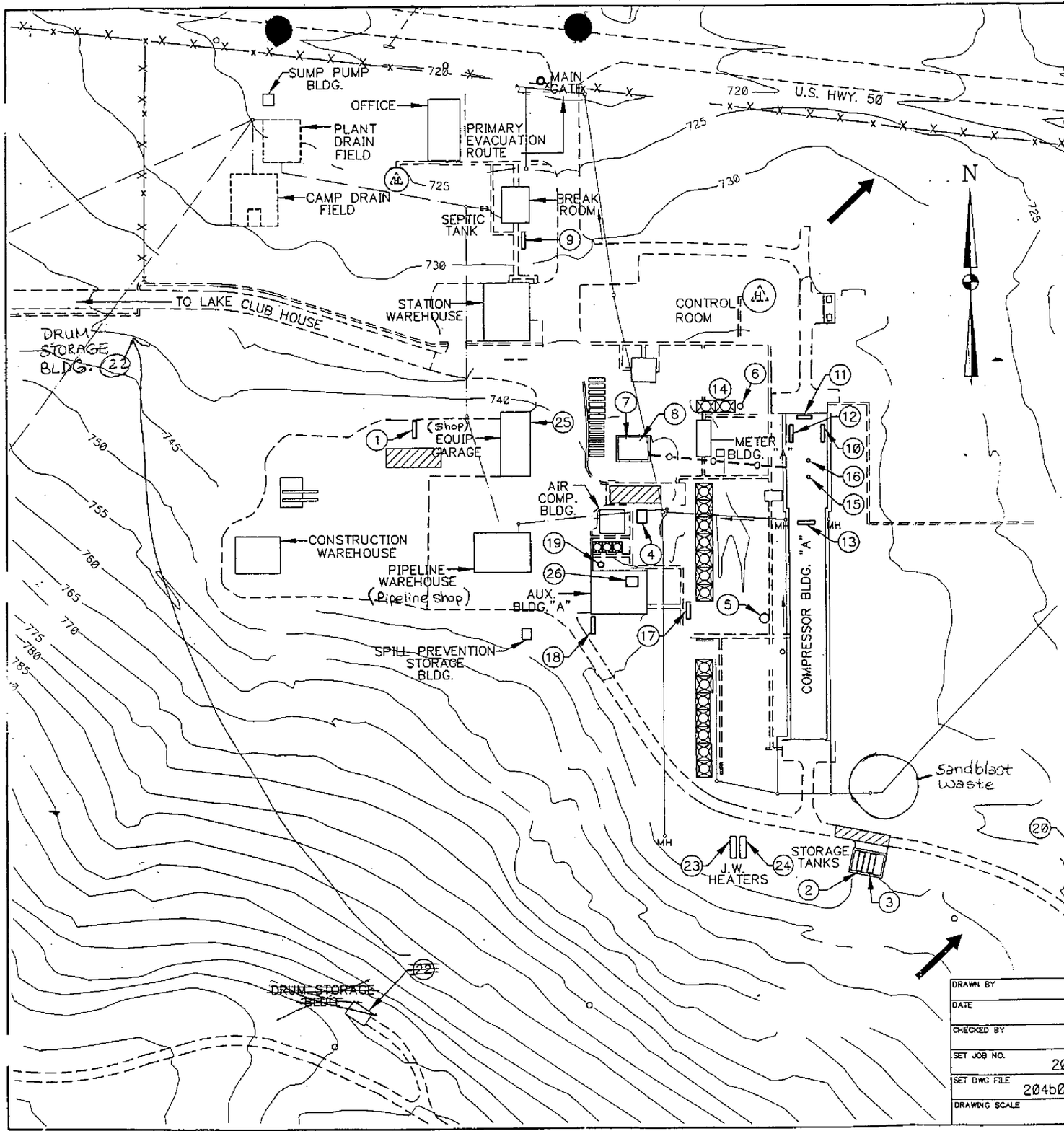
7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-70 have:

   a. Copies of all notices and certifications required in 3745-270? Yes ___ No ❑ N/A ✓ RMK#___

   b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49? Yes ___ No ❑ N/A ✓ RMK#___

   c. Followed the testing frequency specified in the facilities WAP? Yes ___ No ❑ N/A ✓ RMK#___

REMARKS



(1) DIESEL FUEL - 300 GAL.
(2) USED OIL - 3,000 GAL.
(3) PIPELINE CONDENSATE - 3,000 GAL.
(4) AIR COMPRESSOR WATER CONDENSATE TANK - 403 GAL.
(5) JACKET WATER TANK - 11,750 GAL.
(6) GLYCOL SURGE TANK - 881 GAL.
(7) COMPRESSOR LUBE OIL - 10,800 GAL.
(8) AUXILIARY LUBE OIL - 1,100 GAL.
(9) MOP WATER - 250 GAL.
(10) LUBE OIL RUNDOWN - 873 GAL.
(11) CENTRAL VACUUM - 845 GAL.
(12) COMPRESSOR ENGINE J.W. RUNDOWN - 141 GAL.
(13) GLYCOL RUNDOWN - 136 GAL.
(14) GLYCOL RUNDOWN - 370 GAL.
(15) ENGINE NO. 11 HYDRAULIC SYSTEM - 20 GAL.
(16) ENGINE NO. 12 HYDRAULIC SYSTEM - 55 GAL.
(17) GLYCOL RUNDOWN - UNKNOWN
(18) GLYCOL FILL - 3,000 GAL.
(19) AUXILIARY SURGE TANK - 440 GAL.
(20) PECO FILTER DRIP BOTTLE - 375 GAL.
(21) PECO FILTER DRIP BOTTLE - 375 GAL.
(22) DRUM STORAGE BLDG. - 660 GAL. MAX.
(23) J.W. HEATER - 1,500 GAL.
(24) J.W. HEATER - 1,500 GAL.
(25) NEW/WASTE SOLVENT - 220 GAL.
(26) AUXILIARY RUNDOWN OIL - 800 GAL.

LEGEND:

- ABOVEGROUND OIL CONTAINING PIPE
- UNDERGROUND OIL CONTAINING PIPE
- FLOW DIRECTION
- TRUCK LOADING/UNLOADING

DRAWN BY	DJF
DATE	
CHECKED BY	
SET JOB NO.	204020
SET DWG FILE	204b01.dwg
DRAWING SCALE	N.T.S.

SE TECHNOLOGIES
98 Vanadium Road Bridgeville, PA 15017 (412) 221-1100

TENNESSEE GAS PIPELINE CO.
COMPRESSOR STATION #204
ATHENS COUNTY, OHIO
ENVIRONMENTAL EMERGENCY SITE PLAN

DRAWING NAME: FIGURE 2
REV.: 0

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