



State of Ohio Environmental Protection Agency

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December 15, 2010

Mr. Brian Grannan
Industrial Container Services-OH, LLC
P.O. Box 535.
Blacklick, OH 43004

Re: **Industrial Container Services-OH, LLC**
Franklin County, LQG OHD004291654

Dear Mr. Grannan:

Thank you for the tank assessment certification letter (received November 22, 2010) in response to Ohio EPA's July 10, 2008, Notice of Violation letter. Violations # 1, 3, 4, 5, and 8 which had been noted during my June 19, 2008 inspection at the ICS-OH facility at 1385 Blatt Boulevard have already been resolved. I am now able to affirm your return to compliance related to:

Letter Citation #	Rule Citation
6.	OAC rule 3745-66-92(A), Tank System Requirements. <i>Tank #SL-2 has been taken out of service, decommissioned and scrapped, replaced with a new tank system which meets the applicable requirements. Tank #W-03 has been converted to a function (active recycling process) which is no longer subject to these requirements.</i>
7.	OAC rule 3745-66-93(B) and (E)(1), Tank System Secondary Containment Design/Operation Requirements. <i>The new tank has the required secondary containment in good condition.</i>

The new 5,000 gallon cylindrical steel double-walled hazardous waste tank was constructed according to Steel Tank Industry standard # STI-921. The engineer's certification provided for the unit appears acceptable to meet the applicable regulatory requirements.

Violation #2, identified in 2008, still remains partially unresolved:

- Preparedness and Prevention, OAC rule 3745-65-31:** The facility must be operated to minimize the possibility of any unplanned release of hazardous waste.

The new double-walled tank and hard-piping of waste flows through much of the recycling process (and into the new waste tank) are likely to have reduced spills of waste onto the containment floor.

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

However, the containment floor (which remains wet in some areas) remains in visibly poor condition with extensive unsealed cracks and gaps; with chemical erosion of surface areas (down to bare aggregate in some locations); and with discoloration staining from apparent spilled waste. The floor surface is still wet in some locations and may not be functioning purely as secondary containment. The in-floor trench and sump pit continue to function as the primary accumulation and conveyance mechanism for the oily caustic hazardous waste before it is placed in the active recycling process tanks. The Integrity of the sump and trenches has not been evaluated. For these reasons, any risk of a release of hazardous waste to the environment has not been reasonably minimized.

To address this concern, ICS should make any necessary structural repairs to the floor surface and sump, and seal any cracks or gaps. Hard-piping the oily caustic waste from the point of generation (at the caustic cleaning process tank discharge) to the recycling system will sufficiently minimize the possibility of any unplanned release of the hazardous waste being handled in this area. The in-floor sump could then function as secondary containment, and the wet floor conditions would be abated during normal operations.

Ohio EPA believes that the basic pollution prevention measures outlined here would also be prudent business practices for ICS to undertake, which could minimize the risk of any potential ongoing release of hazardous waste constituents that are typically much more costly to clean up than to prevent.

Notice regarding Hazardous Waste Tank Closure Process [OAC Rule 3745-66-97(A) & (B)]

In addition to the above, but slightly related, is the need to complete the closure process for the tanks SL-02 and W-03. Tank #SL-02 has been emptied and removed, recycled as scrap metal. Tank #W-03 has been converted to a new use as a recycling process tank. Closure activities for the containment area have not been fully completed, nor have any potential releases to soils beneath the area been evaluated or addressed. Taking the steps identified above to decontaminate and seal the floor, is appropriate now.. Doing so (and documenting these actions for the record) will further partially address the applicable closure requirements.

ICS must complete other required steps in the hazardous waste tank closure process prior to the (eventual) final closure of your facility. This will include assessing, address and cleaning up (if possible) any releases that may have occurred to the soils beneath the floor and building from the two former hazardous waste tanks. ICS should submit to Ohio EPA any other reports of actions taken to address the closure requirements, as they are done now or in the future.

Other Comment

We reviewed your new daily tank inspection log sheet and I provided some suggestions via email which I hope will help you create a most effective, usable tool which covers necessary bases under Ohio's hazardous waste requirements.

Mr. Brian Grannan
Industrial Container Services-OH, LLC
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I look forward to receiving the remaining compliance follow-up information from you soon. **An update in 30 days is requested.** Should you have any questions, please feel free to call me at (614) 728-3885.

Sincerely,



J. David Hohmann
Environmental Specialist
Division of Hazardous Waste Management
Central District Office

c: CDO File

JDH/nsm ICS 08 prc2

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



LQG TANK SYSTEM REQUIREMENTS

(OAC rule 3745-52-34(A) and OAC rules 3745-66-90 through 3745-66-100)

1.	Is each tank clearly labeled/marked with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
TANK SYSTEM – GENERAL OPERATING REQUIREMENTS		
2.	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"/>
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"/>
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)] <i>RMK: Although there was visual evidence of spillage to containment around the footprint of the former rectangular single-walled tank, the containment area had not been closed and remains in use. The floor, sump and trench were not decontaminated, and continue to collect same waste for reclamation in other recycling tanks in the room. The floor integrity is visibly compromised by numerous cracks and pits. No visual or other assessment of soils beneath has been performed. No release to the environment has been either confirmed or disproven, nor reported as detected. Final closure according to OAC Rule 3745-66-97(A)&(B) has not been completed.</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Answer is uncertain. See remarks.
TANK SYSTEM – INSPECTION REQUIREMENTS		
3.	Has the o/o documented the inspections required in 3745-66-95, in the operating record, including inspection of the following:	
a.	Data from leak detection equipment each operating day? [3745-66-95(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Spill control equipment each operating day? [3745-66-95(B)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Above ground portion of tank each operating day? [3745-66-95(B)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste each operating day? [3745-66-95(B)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	For tank systems using leak detection systems to alert facility personnel to leaks or implementing established workplace practices to ensure leaks are promptly identified, has the o/o documented: [3745-66-95(C)] <i>RMK: The leak detection system is a visual float indicator connected to the base of a <1/64-inch wide interstitial space between inner and outer tank walls.</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Inspections of spill control equipment weekly? <i>RMK: High level alarm and overflow cutoff function are tested/inspected daily.</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Inspections of above ground portion of tank weekly? <i>RMK: external shell of outer (secondary containment) tank only, plus ancillary piping (which is all above ground), are visually inspected each operating day</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Inspections of construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste weekly? <i>RMK: Floor area under the outer tank will be inspected daily</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Use of the alternate inspection schedule, including a description of the established workplace practices at the facility?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
5.	For ancillary equipment NOT provided with secondary containment, has the o/o documented inspections of such equipment each operating day? [3745-66-95(E)] <i>RMK: Ancillary piping is to be inspected daily.</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	Where applicable, did the o/o inspect the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(F)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
7.	Where applicable, did the o/o inspect all sources of impressed current at least bi-monthly? [3745-66-95(F)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

TANK SYSTEM CLOSURE REQUIREMENTS		
8.	If the o/o has closed a <90 day tank, was closure completed in accordance with OAC 3745-66-97 (except for paragraph C)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<i>RMK: This has yet to be completed, addressing the containment and environment beyond which may have been affected by past releases before the 5,000-gallon rectangular tank was removed from service</i>		
TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES		
9.	For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with one of the following: [3745-66-98(A)]	
a.	Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-66-17(B)? [3745-66-98(A)]; or	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
b.	Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A)]; or	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	The tank is used solely for emergencies? [3745-66-98(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
10.	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 (2008)? [3745-66-98(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
11.	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(A) and/or (B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	If so , have the requirements of 3745-65-17(B) been met? [3745-66-99(A) and/or (B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
TANK SYSTEM - WASTE ANALYSIS REQUIREMENTS		
12.	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] <i>RMK: This tank is only used for one waste stream from a dedicated process. It was new prior to being placed into this service.</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Conducted waste analysis and trial treatment or storage tests? [3745-66-100(A)]; OR	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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"/>
TANK SYSTEMS REQUIREMENTS		
13.	Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-66-92(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
14.	Does the written assessment include the following: [3745-66-92(A)]	
a.	Certification by a qualified professional engineer? [3745-66-92(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Consideration of the design standards of the system? [3745-66-92(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Consideration of the hazardous characteristics of the waste(s)? [3745-66-92(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	An evaluation by a corrosion expert (only if the external system/components are metal and in contact with soil or water)? [3745-66-92(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
e.	A determination of design and operational measures that will be needed to protect the tank system from potential damage (only for underground tank components)? [3745-66-92(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
f.	Design considerations to ensure that the tank foundations will maintain the load of a full tank? [3745-66-92(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
g.	Design considerations for anchoring the unit to prevent floatation (only for tanks situated in a seismic fault zone or saturated zone)? [3745-66-92(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

	h.	Design considerations to ensure that the tank system will withstand the effects of frost heave (only for underground tank systems)? [3745-66-92(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.		Are there written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
Do the written statements address all of the following:			
	a.	Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c.	Proper backfilling? [3745-66-92(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	d.	Tightness test; if the tank system was found not to be tight, does the statement indicate that proper repairs were made? [3745-66-92(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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"/>
	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"/>

SECONDARY CONTAINMENT

16.		Has secondary containment been provided? [3745-66-93(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<i>Secondary containment must be provided for tank systems that store or treat materials that become hazardous wastes within two years after the hazardous waste listing, or when the system has reached 15 years of age, whichever comes later. [3745-66-92(A)(2)]</i>			
17.		Is secondary containment one of the following:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a.	An External Liner ? [3745-66-93(E)(1)] If so, (# i-vi = N/A)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	b.	Vault System ? [3745-66-93(E)(2)] If so, (# i-vi = N/A)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	c.	Double-Walled Tank ? [3745-66-93(E)(3)] If so,	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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"/>
	ii.	If metal, are the primary tank interior and outer shell exterior surfaces protected from corrosion?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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"/>
<i>RMK: The spacing of the 1/64 inch gap between inner and outer tank walls may delay any release from the inner tank reaching the leak detection float indicator at the base of the tank. The viscosity of the oily waste, and size of any hole in the primary tank could affect this. However, the leak detection system seemed likely to be able to practicably detect any significant amount of released waste in the interstice before it could get outside the containment.</i>			
	d.	An Equivalent Device ? 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 type="checkbox"/> N/A <input checked="" type="checkbox"/>

SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION

18.		Has each secondary containment system been designed, installed and operated to prevent <u>any</u> migration of wastes or liquid to the soil, groundwater, or surface water and is it capable of <u>detecting</u> and <u>collecting</u> releases and accumulated liquids? [3745-66-93(B)(1)&(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.		Does the secondary containment system meet the following minimum requirements of OAC Rule 3745-66-93(C):	
	a.	Constructed or lined with compatible materials of sufficient strength to prevent failure? [3745-66-93(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Placed on a foundation or base capable of providing support? [3745-66-93(C)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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? [3745-66-93(C)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>RMK: See #17(c) (iii) above. (Duplicate question.)</i>

d.	Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? [3745-66-93(C)(4)] <i>RMK: The narrow spacing of the containment tank jacket may not allow ready drainage and removal of leaked waste, but a port for removing waste from the base of the interstice was included in the system.</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner? [3745-66-93(C)(4)] <i>RMK: The 2-inch port at the base of the secondary containment jacket could be utilized for removing any leaked waste.</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
ANCILLARY EQUIPMENT REQUIREMENTS		
20.	Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)? If not , is the ancillary equipment one of the following: [3745-66-93(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Above ground piping (exclusive of flanges, joints, valves and connections) that is inspected daily?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Welded flanges, welded joints and/or welded connections that is inspected daily?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Sealless or magnetic coupling pumps and/or sealless valves?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	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) that is inspected daily?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE		
21.	Has there been a leak or spill from any tank system or has any tank system been found unfit for use? If so , did the o/o: <i>RMK: Tank# SL-2 and W-03 were not able to be properly certified due to poor condition of their secondary containment. Tank W-03 was converted to another use, and Tank # SL-2 was decommissioned and scrapped. See also answer to question 2.c above... Part of the containment area includes a waste collection system from the production process, in a trench and sump in the floor. It is transferred to recycling tanks next. During the 2008 inspection there was evidence of waste in the containment area, probably from spillage or sloppy transfer operations in addition to the intentional collection of waste in the in-floor sump and trench by the entrance to the room.</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Immediately cease flow of material into the 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"/>
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"/>
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)] <i>RMK: The containment in compromised condition remains in use holding the same waste, from other un-regulated recycling process tanks and from the production process (in the floor sump and trench).</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	For a visible release to the environment, 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"/>
e.	For a visible release to the environment, prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
f.	For a visible release to the environment, properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
g.	Report any release to the environment to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
h.	For a release to the environment, 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"/>
i.	Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

	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"/>
<i>NOTE: The requirements noted in 20.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.</i>		
22.	In the event that the repairs to the tank system were major (e.g., replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from a qualified professional engineer 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"/>
23.	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"/>
24.	If the o/o was unable to repair and return the unit to service as described in 20.a through 20.e, was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)] <i>RMK: As mentioned above, the closure has not yet been fully completed.</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
25.	Does the o/o have a tank system with a variance from secondary containment from which a release has occurred but <u>has not</u> migrated beyond the zone of engineering control? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Has the o/o complied with 3745-66-96(A) through (F), except (D), and decontaminated soils? [3745-66-93(G)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b. If soils cannot be decontaminated/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"/>
26.	Does the o/o have a tank system with a variance from secondary containment from which a release occurred and <u>has</u> migrated from the zone of engineering control? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	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"/>
	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"/>

