



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

November 9, 2012

Ms. Gretchen Crum  
Toxco, Inc.  
265 Quarry Road  
Lancaster, OH 43130

Re: **Toxco, Inc.**  
**TSD/Large Quantity Generator**  
**U.S. EPA ID#: OHD071654958**  
**Fairfield County, CDO**  
**NOV**

Dear Ms. Crum:

Thank you for accompanying me during Ohio EPA's September 27, 2012 inspection of Toxco Inc.'s (Toxco's) facility in Lancaster, Ohio. We inspected Toxco to determine its compliance with Ohio's hazardous waste laws and rules as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). Toxco was also inspected for compliance with the terms and conditions of its hazardous waste facility installation and operation permit issued December 21, 2005, as modified. Our inspection included a review of company operations and written documentation.

At the time of the inspection, Toxco was operating as a permitted hazardous waste storage facility, a large quantity generator (LQG) of hazardous waste, and a large quantity handler of universal waste. During the inspection, we found the following violation of Ohio's hazardous waste laws.

**1. General Inspection Requirements, OAC 3745-54-15(C)**

The owner or operator must remedy any deterioration of malfunction of equipment or structures which the inspection reveals on a schedule which ensures that the problems do not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action must be taken immediately. Toxco is not operating in accordance with section B.5 of the hazardous waste permit issued on December 21, 2005.

Ohio EPA noticed during the facility walk through that the majority of floor sealer (aqua crete) in Phase 1 and in portions of phase 2 and 3 had started to peel up (see attached photos). Upon discussions with Toxco, work orders for this repair have been in since June of 2012 but the facility wanted to evaluate using a new sealer before implementing the work orders.

MS  
FILE COPY

Toxco must submit copies of the work orders in question, a written explanation why the environmental inspection report forms do not have the associated work orders on them, what corrective actions will or have been implemented and a time table for the recoating of Phase 1, 2 and 3.

**General Comments:**

1. As discussed during the inspection and subsequent follow up, Toxco is currently storing batteries for more than a year. Please note that batteries older than one year should be recycled or Toxco may be in violation of OAC Rule 3745-270-50.

For compliance assistance, I encourage you to contact Dan Sowry in the Office of Compliance Assistance and Pollution Prevention (OCAPP) at (614) 728-8575 or via e-mail at [dan.sowry@epa.state.oh.us](mailto:dan.sowry@epa.state.oh.us). OCAPP provides free and confidential assistance to small businesses to help resolve violations and maintain compliance with Ohio EPA's rules.

Enclosed is a copy of the checklists that we completed as a result of the inspection. You can find Ohio's hazardous waste rules and other information on the division's web page at: <http://www.epa.ohio.gov/dhwm/>.

Should you have any questions, please feel free to call me at (614) 728-3884.

Sincerely,



Peter Maneff  
Environmental Specialist  
Division of Materials and Waste Management  
Central District Office

Enclosure

c: CDO File

PM/nsm Toxoco NOPV Sept2012

**NOTICE:**

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





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## PROCESS DESCRIPTION SECTION

Give a general process description (include all processes at the facility)

Toxco, Inc. is a destination facility for nickel cadmium (NiCd) and lead acid batteries. Toxco received a hazardous waste storage permit on December 21, 2005. Toxco is also a large quantity universal waste handler (LQUWH) in addition to a large quantity generator (LQG) of hazardous waste.

Toxco has five main processing areas – the NiCd breaking area, two lead acid breaking areas (manual and automated line), the retort/recovery furnace, and a battery sorting area. Toxco also has installed other pieces of equipment throughout the facility that are used to aid in the recycling process. Currently, Toxco is processing NiCd batteries and lead acid batteries. When batteries arrive at the facility, they are weighed, tagged, and logged. The batteries are also visually inspected per the facility's waste analysis plan. Once labeled, the batteries are brought into either their respective storage areas (phase I for unsorted sealed and dry cell materials, phase II for lead acid, phase III for alkali) or to the staging area located in phase III.

In general, the batteries are then moved into their respective breaking areas where they are processed. The hardware is removed and recycled as stainless steel. The facility cracks the batteries, and the plates are pulled and sent off site to be recycled. The battery cases are washed and placed into the granulator. The granulated material is placed into the 40-yard hazardous waste roll off box or sent off site to be recycled.

In addition, Toxco installed a dehusker, dust collector, muffin monster, and barrel crusher in Building 1. The dehusker removes plastic cases that enclose intact battery cells. The plastic cases are cracked allowing the intact battery cells to be separated from the plastic case for the purpose of recycling. The muffin monster is used to shred sintered nickel and sintered cadmium plates. The shredded material is then accumulated and used as feedstock in the retort furnaces. The dust collector (baghouse) is used to reduce the potential atmospheric emissions of particulate matter that may be generated during operation of the muffin monster and dehusker. The barrel crusher is used to compact empty metal barrels, which are then managed as scrap metal.

In Building 2, Toxco has installed a cadmium plate shredder line and cadmium treatment system. The plate shredder is operated to process steel electrode pocket plates containing cadmium oxide from NiCd batteries. In addition, Toxco operates an automated battery breaking process system for lead acid batteries, which runs approximately once a month (It was installed in 2009).

Toxco uses retort furnaces to recover nickel and cadmium from dry cell batteries and plates separated from batteries in the alkali breaking area. The recovered cadmium and nickel are collected and sold as scrap metal.

The facility also operates as a Large Quantity Universal Waste Handler (LQUWH) for other types and chemistries of batteries.

The facility generates several waste streams, including polycarbonate plastic, PPE, retort

wastewater, potassium hydroxide, lead plates, lead oxide, polypropylene plastic, lead absolyte plates, metallics, and plastic lead separators. Toxco also generates spent fluorescent bulbs, a sulfuric acid effluent which is neutralized on site, and a nonhazardous filter cake.

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## WASTE ACTIVITIES AND P2 SUMMARY SECTION

For each of the processes listed above that generate a waste give the following information: (1) name of process generating waste, (2) name or description of waste generated (e.g. sludge, solvent, ash, used oil, spent lamps, etc.), (3) EPA waste codes, if applicable, (4) quantity generated per month, (5) type of accumulation (container, tank, etc.) (6) waste accumulation location in facility, (7) type of on-site treatment (if used), (8) name of off-site management facility and type of waste management activity occurring there, (9) Current P2 activities, and (10) P2 opportunities.

In 2011, Toxco received and processed approximately 3.1 million pounds of universal waste batteries for metals recovery (retorting) and 37.3 million pounds of universal waste batteries for other recycling (battery breaking) based on the facility's 2011 Annual Report.

**Polycarbonate plastic** - This plastic is generated from the battery cases of the lead acid batteries (manual process). The plastic is ground and placed in a 40-yard roll off box located in a truck bay. The PPE is also added into this roll off box. The waste carries D006 and D008 waste codes. The facility generates a roll off box containing plastic and PPE every week. In the past, it has been sent to EQ Detroit (Michigan Disposal Waste Treatment Plant) for stabilization or chemical fixation prior to disposal at another site (H111). Recently, Toxco has started sending this waste to Envirosafe in Oregon, Ohio.

**PPE** - The PPE is generated from changing an employee's PPE for a break or at the end of a shift. The PPE is accumulated in the 40-yard roll off box with the polycarbonate plastic. The waste carries a D006 and D008 waste code. It is sent to either EQ Detroit or Envirosafe. In 2011, Toxco shipped approximately 1.18 million pounds of polycarbonate plastic and PPE off site.

**Retort waste water** - The retort wastewater is generated from the retort furnaces. The dry cell NiCd batteries contain hydroxide and when they are heated it comes off and is collected in the 2,500 gallon wet scrubber tank. Any plastic in these batteries also goes to the wet scrubber tank. Toxco generates approximately 2,500 gallons of retort wastewater every 90 days. The waste carries a D006 waste code. Due to the level of phenols in this waste, it is sent to Vickery Environmental, Inc. for deepwell or underground injection (H134) or the Clean Harbors facility in Cleveland, Ohio. In 2011, Toxco generated approximately 12,700 gallons of this waste stream.

**Potassium hydroxide** - The potassium hydroxide (KOH) is generated from processing the NiCd batteries. The KOH is collected in a 2,500 gallon tank, which is located inside the east side of the alkali battery recycling area. The waste carries D002 and D006 waste codes. Currently, Toxco treats the KOH in the onsite WWTU and then discharges it to the POTW. In the past, the KOH that was not discharged to the POTW was sent to Vickery Environmental, Inc. with the retort waste water. Now, it is sent to the Clean Harbors facility in Cleveland, Ohio. In 2011, Toxco generated approximately 121,500 gallons of this waste stream.

**Lead plates** - The lead plates are generated from the lead acid batteries (manual process). The

lead plates carry a D008 waste code. The lead plates are collected and placed in stacks on a spill collection mat in phase I or II of the storage areas. The lead plates are left on site in stacks for a couple of weeks while they continue to drain. Toxco sends two to three truckloads of lead plates off per day. The lead plates are sold to both domestic and foreign customers to be recycled.

**Lead oxide** - The lead oxide is generated from the filter cake in the lead acid processing area (manual process). The lead oxide is collected in 55-gallon drums located in the phase I or II of the storage area. The lead oxide carries a D008 waste code. The facility ships two to three shipments of lead oxide per week. This waste stream is also sold to customers to be recycled.

**Polypropylene plastic** - The polypropylene plastic is generated from the battery cases. The plastic is ground and sold as a product to be used to make buckets. A truckload of plastic is sent by manifest about every other month. The plastic carries a D008 waste code. In 2011, the facility shipped approximately 213,000 pounds of this waste off site for reclamation.

**Lead absolyte plates** - The lead absolyte plates are generated from the manual breaking process. This waste stream is irregular. The waste carries a D008 waste code. The waste is collected and sent by manifest off site. Recently, Toxco generated this waste stream to be exported. The waste was generated from the manual breaking process and immediately placed in lined Gaylord boxes.

**Fluorescent bulbs** - The fluorescent bulbs are generated when they are changed out. The bulbs are sent to Baltimore, Ohio, to go on to a recycler.

**Sulfuric acid effluent** - This effluent is generated from the lead acid battery breaking processes. It is neutralized in Toxco's on site wastewater treatment system and then discharged to the City of Lancaster POTW.

**Filter cake** - Nonhazardous magnesium sulfate filter cake is generated from the wastewater treatment system. It is sent off site for disposal at a solid waste landfill (Republic landfill).

**Waste from the Automated Line** - Toxco also operates an automated battery breaking process for lead acid batteries. Four waste streams are generated from this operation. From the first screw, Toxco generates lead oxide sludge, which is classified as an exempt sludge; it is sent to a smelter. Toxco generates a metallics waste stream from the second screw, which is managed as hazardous waste (D008) and also sent to a smelter. The materials from the first two screws are accumulated in gaylords; about 15-20 gaylords are filled each day the line is operating. From the third screw, polypropylene plastic is generated and managed as hazardous waste (D008). About 90% of this material is recycled, and Toxco fills about 3 super sacks per day with this plastic. Lastly, Toxco generates plastic lead separators from the automatic line which are managed as hazardous waste (D008) and accumulated in the hazardous waste roll-off box, which is sent to EQ Detroit or Envirosafe for disposal. Sulfuric acid effluent is being collected and routed to the facility's wastewater treatment system. Overflow is collected in two less than 90-day accumulation tanks prior to treatment.

**Additional P2 remarks and information:**

Based on Toxco's June 2011 Waste Minimization Report:

1. Hazardous waste generated at the site decreased by approximately three percent from the 2009 baseline year to the 2010 reporting year.
2. The 2009 addition of the automated lead acid battery processing system is believed to have resulted in more efficient separation of recyclable components (lead oxides and plastic), which in turn appears to have impacted the amount of each of the corresponding waste streams generated at the facility.
3. Hazardous waste generation may be decreased by providing training on pollution prevention and involving employees in the development of waste minimization alternatives. Toxco may implement administrative measures and provide more employee training in the future.
4. The facility will attempt to reduce by up to five percent the quantity of hazardous waste generated at the facility, relative to total pounds of material and waste received, over the next four years.

The next waste minimization report is due June 2013.

Send to Central Office <input type="checkbox"/>	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE</b> <b>IDENTIFICATION/VERIFICATION FORM</b>	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to [brad.hauser@epa.state.oh.us](mailto:brad.hauser@epa.state.oh.us).

<b>Site EPA ID No.</b> <b>Site Name</b> <b>Site Location Information</b> <b>Site Land Type</b> (check only one) <b>NAICS code(s)</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a>	EPA ID Number: <b>OHD071654958</b> Name: <b>Toxco, Inc.</b> Website: (Optional) Street Address: <b>265 Quarry Road</b> City, Town, or Village: <b>Lancaster</b> State: <b>OH</b> County Name: <b>Fairfield</b> Zip Code: <b>43130</b> <table style="width:100%; border: none;"> <tr> <td style="border: none;">Private <input checked="" type="checkbox"/></td> <td style="border: none;">County <input type="checkbox"/></td> <td style="border: none;">District <input type="checkbox"/></td> <td style="border: none;">Federal <input type="checkbox"/></td> <td style="border: none;">Indian <input type="checkbox"/></td> <td style="border: none;">Municipal <input type="checkbox"/></td> <td style="border: none;">State <input type="checkbox"/></td> <td style="border: none;">Other <input type="checkbox"/></td> </tr> </table>	Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
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<b>Facility Representative</b> Additional names can be recorded in number 12 Only provide address information if it is different than the site address	First Name: <b>Gretchen</b> MI: Last Name: <b>Crum</b> Title: <b>EHS Manager</b> Phone Number: <b>740-653-6290</b> Phone Number Extension: E-Mail Address: <b>gviken@toxco.com</b> Fax Number: <b>740-653-3240</b> Fax Number Extension: Street or P.O. Box: City, Town or Village: State: Zip Code:								

<b>Legal Owner And Operator of the Site.</b> List Additional Owners and/or Operators in the Comment Section or on another copy of this form page.	Name of Site's Legal Owner: <b>Toxco, Inc.</b> Date Became Owner (mm/dd/yyyy): <b>7/1/2000</b> <table style="width:100%; border: none;"> <tr> <td style="border: none;">Owner Type: Private <input checked="" type="checkbox"/></td> <td style="border: none;">County <input type="checkbox"/></td> <td style="border: none;">District <input type="checkbox"/></td> <td style="border: none;">Federal <input type="checkbox"/></td> <td style="border: none;">Indian <input type="checkbox"/></td> <td style="border: none;">Municipal <input type="checkbox"/></td> <td style="border: none;">State <input type="checkbox"/></td> <td style="border: none;">Other <input type="checkbox"/></td> </tr> </table> Street or P.O. Box: <b>265 Quarry Road</b> City, Town or Village: <b>Lancaster</b> Owner Phone #: <b>740-653-6290</b> State: <b>OH</b> Country: <b>USA</b> Zip Code: <b>43130</b> Name of Site's Operator: <b>Toxco, Inc.</b> Date Became Operator (mm/dd/yyyy): <b>7/1/2000</b> <table style="width:100%; border: none;"> <tr> <td style="border: none;">Operator Type: Private <input checked="" type="checkbox"/></td> <td style="border: none;">County <input type="checkbox"/></td> <td style="border: none;">District <input type="checkbox"/></td> <td style="border: none;">Federal <input type="checkbox"/></td> <td style="border: none;">Indian <input type="checkbox"/></td> <td style="border: none;">Municipal <input type="checkbox"/></td> <td style="border: none;">State <input type="checkbox"/></td> <td style="border: none;">Other <input type="checkbox"/></td> </tr> </table> Street or P.O. Box: <b>265 Quarry Road</b> City, Town or Village: <b>Lancaster</b> Operator Phone #: <b>740-653-6290</b> State: <b>OH</b> Country: <b>USA</b> Zip Code: <b>43130</b>	Owner Type: Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>	Operator Type: Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
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**VIOLATIONS CITED?**  Yes  No

**TYPE OF HANDLER - MARK "X" AS APPROPRIATE**

<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.	<input checked="" type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input type="checkbox"/> Conditionally Exempt Small Quantity Generator <input type="checkbox"/> U.S. Importer of Hazardous Waste <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator
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**LARGE QUANTITY GENERATOR REQUIREMENTS  
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

CESQG: ≤100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or ≤ 1 Kg. of acutely hazardous waste.  
 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.**

Safety Equipment Used:

**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"/>
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3.	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"/>
4.	Were annual reports filed with Ohio EPA on or before March 1 <sup>st</sup> ? [3745-52-41(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	Has the generator transported or caused to be transported hazardous waste to <b>other</b> than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
7.	Has the generator disposed of hazardous waste <b>on-site without a permit</b> or at another facility <b>other</b> than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
8.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.**

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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**NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).**

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]	
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

**NOTE: Complete appropriate checklist for each unit.**

**NOTE: If waste is treated to meet LDRs, use LDR checklist.**

11.	Does the generator export hazardous waste? If so:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

26.	Does the generator keep records and documentation of:		
	a.	Job titles? [3745-65-16(D)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Job descriptions? [3745-65-16(D)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Completed training or job experience required? [3745-65-16(D)(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
27.	Are training records for current personnel kept until closure of the facility and 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"/>

*NOTE: 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 manifest, etc.*

#### CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	Does the plan describe the following:		
	a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*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. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]*

30.	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"/>
31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
32.	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"/>

*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.*

#### EMERGENCY PROCEDURES

33.	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"/>
	a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	Did the facility follow the emergency procedures in 3745-65-56(A)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*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.*

**USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS**

45.	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"/>
46.	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"/>
47.	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"/>
b.	In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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"/>

*NOTE: Record location on process summary sheets, photograph the area, and record on facility map.*

48.	Is the container accumulation areas(s) inspected weekly? [3745-66-74]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: "Week" means 7 consecutive days per ORC§1.44(A).*

49.	Are containers of ignitable or reactive wastes 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"/>
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.*

53.	If the generator has closed a <90 day accumulation area does the 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"/>
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*NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. 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]*

**PRE-TRANSPORT REQUIREMENTS**

54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
55.	Does each container ≤119 gallons have a completed hazardous waste label?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**GENERATOR LDR CHECKLIST  
DOES NOT APPLY TO CESQGS**

**GENERAL REQUIREMENTS**

1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07(A)(7)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not,	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).</i></p>		
3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<p><i>FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.</i></p>		
6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains &gt;10% TOC) D001 wastes or listed HWs.</i></p> <p><i>NOTE: Written documentation of this determination is not required.</i></p>		
7.	Did the generator treat his HW /soil on-site to meet the LDR treatment standard?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE: If "Yes" see question #16.</i></p>		
8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
i.	Applicable HW codes?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
ii.	Manifest number of the first shipment to the TSD?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
iii.	A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination.?"	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	Does the generator have a copy of the LDR notification form/notice on file? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

<i>NOTE: If "Yes", HW is improperly being treated by dilution.</i>		
b.	Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

*NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].*

*NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.*

**GENERATOR TREATMENT**

16.	Does the generator treat to meet LDRs on-site?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	If "Yes"...complete the rest of the checklist. If "No"...stop...you are done.	
a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

*NOTE: This is a laboratory analysis but it does not have to be kept by the generator.*

c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**NOTIFICATION FORM FOR GENERATOR TREATMENT**

17.	a.	Contains all information in #11 a-g above and	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	b.	If the treated HW/soil is listed.....notification contains the following certification statement:  "I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:	
	i.	Prepare a one-time notification? [3745-270-09 (D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	ii.	Maintain a copy of the notice onsite? [3745-270-09(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iii.	Include in the notification: [3745-270-09(D)]	
	1.	Name & address of receiving landfill?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	2.	Description of HW when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	3.	HW code when generated?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**LOG TANK SYSTEM REQUIREMENTS (OAC rule 3745-52-34(A) and OAC rules 3745-66-90 through 3745-66-100)**

(Please refer to the rules before or while completing this checklist.)

1. Is each tank clearly labeled/marked with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes  No  N/A

**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  No  N/A

b. Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)? [3745-66-94(B)] Yes  No  N/A

c. If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96? [3745-66-94(C)] Yes  No  N/A

**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  No  N/A

b. Spill control equipment each operating day? [3745-66-95(B)(1)] Yes  No  N/A

c. Above ground portion of tank each operating day? [3745-66-95(B)(2)] Yes  No  N/A

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  No  N/A

*NOTE: "Each operating day" is each day that the tank system is being used to manage (store or treat) hazardous waste.*

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)] Yes  No  N/A

a. Inspections of spill control equipment weekly? Yes  No  N/A

b. Inspections of above ground portion of tank weekly? Yes  No  N/A

c. Inspections of construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste weekly? Yes  No  N/A

d. Use of the alternate inspection schedule, including a description of the established workplace practices at the facility? Yes  No  N/A

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)] Yes  No  N/A

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  No  N/A

7. Where applicable, did the o/o inspect all sources of impressed current at least bi-monthly? [3745-66-95(F)(2)] Yes  No  N/A

**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  No  N/A

**TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES**

9. For tanks used to treat or store ignitable or reactive wastes, has the o/o Yes  No  N/A

		[3745-66-92(A)]	
<i>NOTE: CO-DHWM Engineering staff are available to assist you with evaluation of the written assessment.</i>			
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 checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input 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"/>
<b>SECONDARY CONTAINMENT</b>			
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>NOTE: 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 <b>External Liner</b> ? [3745-66-93(E)(1)] If so,		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
i.	Is liner designed or operated to contain 100% of the capacity of the largest tank?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 type="checkbox"/>
iii.	Is liner free of cracks and gaps?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
iv.	Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
v.	Are chemically resistant water stops in place at all points? ( <i>concrete liners only</i> )		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 type="checkbox"/>
b.	<b>Vault System</b> ? [3745-66-93(E)(2)] If so,		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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 type="checkbox"/>
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 type="checkbox"/>
iii.	Are chemically resistant water stops in place at all points?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
iv.	Is there a compatible interior coating to prevent migration into the concrete?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	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"/>
	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)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" 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"/>
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.					
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)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
25.		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 type="checkbox"/>	N/A <input checked="" 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 <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 type="checkbox"/>	N/A <input checked="" 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"/>

LARGE QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS – BATTERIES AND LAMPS		
<i>Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more</i>		
<i>Small Quantity Universal Waste Handler (SQUWH) = less than 5,000 Kg</i>		
<b>GENERAL REQUIREMENTS</b>		
1.	Has the LQUWH obtained a U.S. EPA Identification number before exceeding the 5,000 kg limit? [3745-273-32(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>PROHIBITIONS</b>		
2.	Did the LQUWH dispose of universal waste? [3745-273-31(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Did the LQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-37 or managing specific wastes as provided in OAC rule 3745-273-33? [3745-273-31(B)] (this change makes it like the SQUWH checklist)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<b>WASTE MANAGEMENT AND LABELING/MARKING</b>		
<b>UNIVERSAL WASTE BATTERIES</b>		
4.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-33(A)] <b>Toxco breaches the casings of lead acid and NiCd wet cell batteries. These batteries are stored in the permitted hazardous waste storage area.</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
8.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-34(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>UNIVERSAL WASTE LAMPS</b>		
9.	Does the LQUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and 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? [3745-273-33(D)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	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 constituents to the environment? [3745-273-33(D)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<p><b>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 rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.</b></p>		
11.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamps?" [3745-273-34(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

25.	Does the record include the following:		
	a.	Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Quantity of each type of universal waste? [3745-273-39(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Date received? [3745-273-39(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
26.	Is universal waste shipped to another handler? If so:		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a.	Is a record of each shipment kept? [3745-273-39(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
27.	Does the record include the following?		
	a.	Name and address of universal waste handler, destination facility, or foreign destination? [3745-273-39(B)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Quantity of each type of universal waste? [3745-273-39(B)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Date shipped? [3745-273-39(B)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
28.	Are records kept for three years? [3745-273-39(C)(1)&(2)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>EXPORTS</b>			
29.	Is waste being sent to a foreign destination? If so:		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a.	Does the large quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56 and 3745-52-57? [3745-273-40(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-40(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

GENERAL PERMIT COMPLIANCE AND ACTIVITIES			Yes	No	N/A	
1.	Has the expiration date of the permit passed? If so:		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	
	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"/>	
	b.	Has the facility submitted an application for a permit renewal to the director no later than 180 days prior to the expiration date of the permit? [Condition A.6]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
2.	Has the permittee submitted the annual permit fee, payable to "Treasurer, State of Ohio," to Ohio EPA on or before the anniversary of the date of issuance during the term of the permit? [Condition A.26]		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	
3.	Is the permittee conducting any hazardous waste management activities (not otherwise exempt by law) which are not authorized by the permit? [Conditions A.1(b) and A.5]		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	
4.	Have any provisions of the permit been identified as invalid? [Condition A.4]		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	
5.	Has the permittee identified any instances of noncompliance with the permit, ORC Chapter 3734, or the rules adopted thereunder, which may endanger human health or the environment? If so:		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	
	a.	Did the permittee immediately report the following to Ohio EPA's Emergency Response Unit? [Condition A.20]				
	i.	Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
	ii.	Information concerning a release of hazardous waste, fire or explosion at the facility which could threaten human health or the environment outside the facility including a description of:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
		A. Name, address and telephone number of the owner/operator?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
		B. Name, address and telephone number of the facility?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
		C. Date, time and type of incident?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
		D. Name and quantity of material(s) involved?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
		E. The extent of injuries, if any?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
		F. An assessment of the actual or potential hazard to the environment and human health outside the facility?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
		G. Estimated quantity and disposition of recovered material that resulted from the incident?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
6.	Did the permittee provide a written report to Ohio EPA's Emergency Response Unit and DHWM within 5 days of becoming aware of the circumstances reported in Questions No. 5? If so, did the report contain: [Condition A.21]		Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
	a.	A description of the noncompliance and its cause (including exact dates and times)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
	b.	Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? and	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	
	c.	Steps taken or planned to minimize the impact on the environment and to reduce, eliminate and prevent recurrence of the noncompliance?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>	

**SITE ENTRY - AVAILABILITY OF RECORDS**

18.	As specified in Condition A.11, has the permittee allowed the director or an authorized representative, upon proper identification to:		
a.	Enter at reasonable times upon the premises where a regulated activity is located or where records are kept under the conditions of the permit?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
b.	Have access to and copy, at reasonable times, any records required to be kept under the conditions of the permit?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
c.	Inspect, at any time, facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
d.	Sample, document, photograph or monitor, at reasonable times, any substances or parameter at the location of the facility to assure compliance with the permit or as otherwise authorized by ORC Chapter 3734. and the rules adopted thereunder?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

**INSPECTION ITEMS FROM PART B APPLICATION**

*NOTE: The inspector or permit writer may add questions pertaining to the permittee's application, as appropriate.*

**RECORDKEEPING/OPERATING REQUIREMENTS**

**OPERATING RECORD**

19.	In accordance with OAC rules 3745-54-73 and 3745-54-74 and Condition B.22 of the permit, does the permittee maintain an Operating Record which contains the following information:		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	A description of the quantity of each hazardous waste and the method(s) and date(s) of its treatment or storage?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
b.	The location of each hazardous waste and quantity at each location including cross-reference to specific manifest numbers?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
c.	Records and results of required waste analysis?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
d.	Summary reports and details of all incidents that required implementation of the contingency plan?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
e.	Records and results of required inspections?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
f.	Documents required to be maintained by LDR requirements of OAC Chapter 3745-270?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
g.	Monitoring, testing, or analytical data, and corrective action where required, from groundwater monitoring and required monitoring of surface impoundments, landfills, waste piles and land treatment units? [3745-54-73(B)(6)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
h.	<b>For disposal facilities</b> , location and quantity of each hazardous waste record on a facility map and cross-references to manifest document numbers? [3745-54-73(B)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	

**DOCUMENTS TO BE MAINTAINED AT FACILITY**

20.	In accordance with Condition A.28 of the permit, is the permittee maintaining the following documents at the facility:		
a.	Waste analysis plan in accordance with OAC rule 3745-54-13?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
b.	Contingency plan in accordance with OAC rule 3745-54-53?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

27.	Has Ohio EPA requested submittal of any reports or other information from the permittee? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Have the submittals been signed and certified according to OAC rule 3745-50-42? [Condition A.13]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>INSPECTION ITEMS FROM THE PART B APPLICATION</b>		
<i>NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.</i>		
<b>WASTE MINIMIZATION REQUIREMENTS</b>		
28.	Does the permittee certify at least once every year that a program is in place to reduce the volume and toxicity of hazardous waste generated in accordance with Condition A.29(a) of the permit and OAC rule 3745-54-73(B)(9)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	Did the permittee submit the waste minimization report to Ohio EPA, Office of Compliance Assistance & Pollution Prevention and Central District Office within 180 days of journalization of this permit and updates every two years thereafter? [Condition A.29] <b>The next report is due June 2013.</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
30.	Has the permittee reduced the amount of waste (hazardous waste, solid waste, air emission, waste water discharges, etc.) this year generated at their facility by implementing pollution prevention/waste minimization? <b>Since Toxco manages and recycles batteries, much of the waste generated from the recycling process is associated entirely with the amount of batteries received at the facility for reclamation. Therefore, waste minimization measures considered for the purposes of the report include operational improvements and administrative measures in the areas of training, emergency preparedness, and standardized practices.</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	If so, what amount of waste has the permittee reduced this year?	
31.	Has the permittee saved money this year by implementing pollution prevention (reducing raw material usage, disposal fees, energy savings, etc.)? <b>See "Waste Activities and P2 Summary Section" for additional discussion.</b>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	If so, how much money has the permittee's company saved this year?	
<i>NOTE: If this facility is inspected two times a year, the information obtained in Questions 28 through 31 only needs to be collected one time for the calendar year.</i>		
<b>GROUND WATER MONITORING</b>		
32.	Has the permittee conducted sampling of their monitoring wells? [Condition J.9 & J.10]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
33.	Have they reported the results in the Annual Report to the director by March 1 <sup>st</sup> as required by Condition B.25 of the permit?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>INSPECTION ITEMS FROM THE PART B APPLICATION</b>		
<i>NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.</i>		
<b>WASTE ACCEPTANCE AND GENERATION</b>		
34.	Is the permittee storing any containers of hazardous waste received from any off-site source that permittee is not permitted to store? [Condition A.1.]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
35.	Has the permittee arranged to receive hazardous waste from a foreign or off-site source that the permittee is not permitted to store? [Condition A.1.]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
36.	Has the permittee notified the regional administrator of U.S. EPA at least	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

Toxco, Inc./ September 27, 2012

OHD071654958

TSD Baseline Checklist/September 2010

Page 5 of 20

	d.	Did the permittee prepare a manifest in accordance with OAC rules 3745-54-71(E)(1) through (7) for rejected waste to be sent to an alternate facility? [3745-54-72(E)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	e.	Did the permittee prepare a manifest in accordance with OAC rules 3745-54-72(F)(1) through (7) for rejected waste to be sent back to the generator? [3745-54-72(F)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
43.		If the permittee receives hazardous waste imported from a foreign source, has the permittee mailed a copy of the manifest to U.S. EPA within 30 days after a delivery? [3745-54-71(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
44.		Does the permittee send a hazardous waste shipment to a consignment state (i.e., the state in which the hazardous waste shipment will be transported and subsequently managed)? If so:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Has the permittee determined whether the consignment state for a shipment regulates any additional wastes (beyond those regulated federally) as hazardous wastes under its state hazardous waste program? [3745-54-71(E)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Has the permittee determined whether the consignment state requires the permittee to submit any copies of the manifest to the state? [3745-54-71(E)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
45.		If the permittee has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by OAC rule 3745-54-76(A) been submitted to the director within 15 days?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<b>WASTE ANALYSIS/WASTE ANALYSIS PLAN</b>					
46.		Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information of the waste in accordance with OAC Chapters 3745-54 to 3745-57, 3745-205 and 3745-270 and the terms and conditions of the permit? [Condition B.3(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
47.		Does the permittee follow the procedures described in the WAP (Section A.3 of the approved permit application)? [Condition B.3(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
48.		In accordance with OAC rule 3745-54-13(A)(3), does the permittee repeat the waste analysis when the process or operation generating the hazardous waste has changed, or at least annually? [Condition B.3]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
49.		<b>FOR OFF-SITE FACILITIES:</b> Are the sampling methods and procedures specified in the permittee's WAP that will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identification of the waste on the manifest [3745-54-13(C)]?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
50.		<b>FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER OAC rule 3745-270-04(A):</b>			
		Does the waste analysis plan include procedures and schedules for:			
	a.	The sampling of impoundment contents? [3745-54-13(B)(7)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	b.	The analysis of test data? [3745-65-13(B)(7)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	c.	The annual removal of residues which are not delisted or which exhibit the characteristic of a hazardous waste and either do not meet treatment standards (OAC rules 3745-270-40 to 3745-270-49) or where no treatment standards have been established? [3745-54-13(B)(7)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
51.		<b>Where applicable:</b> The methods which will be used to meet additional waste analysis requirements for specific waste management methods specified in OAC rules 3745-54-17, 3745-57-14, 3745-57-41 and 3745-270-	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

	to minimize the possibility of a fire, explosion, or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, ground or surface water? [3745-54-31 and Condition B.1]	
60.	Does the permittee properly maintain and operate the facility to achieve compliance with the terms and conditions of the permit including: [Condition A.9]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Effective management practices?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Adequate funding?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Adequate operator staffing and training?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Adequate laboratory and process controls?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

#### INSPECTION ITEMS FROM THE PART B APPLICATION

*NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.*

#### PERSONNEL TRAINING

61.	Is the permittee conducting personnel training in accordance with the conditions of the permit and with the following requirements of OAC rule 3745-54-16? [Condition B.6]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Does the permittee provide personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [3745-54-16(A)(B)(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Does the permittee provide personnel training to new employees within six months after their date of employment as required by OAC rule 3745-54-16(B)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Does the permittee provide an annual refresher training course as required by OAC rule 3745-54-16(C)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
62.	Is the permittee maintaining personnel training records as required by OAC rule 3745-54-16(D) and the approved permit application, including: written job titles, job descriptions and documented employee training records? [Condition B.6]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

#### INSPECTION ITEMS FROM THE PART B APPLICATION

*NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.*

#### REQUIRED EQUIPMENT

*NOTE: Inspector may attach a list of emergency equipment. If so, the attachment document is referenced as Appendix \_\_\_\_\_.*

63.	Has the permittee equipped the facility with the following emergency equipment as required by OAC rule 3745-54-32 and Condition B.9 of the permit:	
a.	An internal communications or alarm system?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	A device such as a telephone which is capable of summoning emergency assistance from local emergency authorities?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Portable fire extinguishers and/or fire control equipment, spill control and decontamination equipment?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Water in adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers or water spray systems?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
64.	Is the permittee inspecting, testing and maintaining the equipment specified	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	d.	Location of all records in the facility?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e.	Facility layout?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
74.		In accordance with OAC rule 3745-54-55, does/do the emergency coordinator(s) have the authority to commit the resources needed to carry out the contingency plan? [Condition B.19]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
75.		Does the permittee have a contingency plan for the facility that: [Condition B.15]	
	a.	Describes the actions facility shall take to comply with OAC rules 3745-54-51 through 3745-54-56 in response to fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil or surface water at the facility?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Describes arrangements agreed to by local police, fire departments, hospitals, contractors and Ohio EPA and the local emergency response team to coordinate emergency services?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Includes an up-to-date list of names, addresses and phone numbers (office and home) for all persons qualified to act as emergency coordinator in the order that they will assume responsibility for coordination of emergency response?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	Includes a list of all emergency equipment, including fire extinguishing systems, spill control equipment, communications and alarm systems and decontamination equipment?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	e.	Includes the location and a physical description of each item on the list referenced in Question No. 75(d), and a brief outline of its capabilities?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	f.	Includes an evacuation plan for facility personnel describing signals to be used to begin evacuation, evacuation routes, and alternate evacuation routes, in situations where the primary routes could be blocked by releases of hazardous waste?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE: If the permittee 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 permittee can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The permittee may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-54-52(B)]</i></p>			
<b>IMPLEMENTATION OF CONTINGENCY PLAN</b>			
76.		Has there been a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment since the date of the last inspection? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE: Example scenarios that could be threats to human health or the environment are provided in a DHWM guidance document on "Contingency Plan Implementation and Incident Reporting Under Ohio Hazardous Waste Rules" at: <a href="http://epa.ohio.gov/portals/32/pdf/Contingency_Plan_and_Incident_Reporting.pdf">http://epa.ohio.gov/portals/32/pdf/Contingency_Plan_and_Incident_Reporting.pdf</a>. Facility specific scenarios are included in the permittee's contingency plan.</i></p>			
	a.	Did the permittee immediately implement the approved contingency plan and follow the emergency procedures described in OAC rule 3745-54-56? [Conditions B.14 and B.20]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	Did the permittee immediately notify Ohio EPA's emergency response team using the 24-hour toll free number (800)282-9378 providing the following information: [3745-54-56(D)(2)]	
	i.	Name and telephone number of the reporter?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	ii.	Name and address of the facility?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

	required by OAC rule 3745-55-15? [Condition B.33]	
g.	Has the permittee submitted a survey plat to the director and local zoning authority no later than the submission of certification of closure of each hazardous waste disposal unit? [Condition B.34]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>POST-CLOSURE MAINTENANCE</b>		
<i>NOTE: Inspector may attach a post-closure maintenance inspection schedule. If so, the attached document is referenced as Appendix</i>		
81.	Has the permittee inspected the components, structures, and equipment at the site in accordance with the inspection schedule in Section ____ of the approved permit application on a quarterly basis? [OAC rule 3745-55-17(A)(1)(b)] [Condition B.35]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
82.	Has the permittee conducted and recorded an inspection of at least the following? [Condition B.35]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Security control devices (gates, locks, fences and signs);	
b.	Erosion control;	
c.	Cover settlement, subsidence and displacement;	
d.	Vegetative cover conditions;	
e.	Integrity of run-on/run-off control measures;	
f.	Cover drainage system functioning;	
g.	Monitor well conditions; and	
h.	Benchmark integrity.	
83.	Is the permittee using the inspection forms found in the approved Part B permit application? [Section ____ of the approved permit application]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
84.	Have suitable repairs been made within a reasonable amount of time? [Condition B.35]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
85.	Have repairs been indicated on the Notification Repair Form? [Condition B.35]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
86.	Was the Notification of Repair Form submitted to Ohio EPA within one week after determining that repairs are necessary? [Condition B.35]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>INSPECTION ITEMS FROM THE PART B APPLICATION</b>		
<i>NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.</i>		
<b>STORAGE OF HAZARDOUS WASTES IN CONTAINERS</b>		
<i>NOTE: The requirements of Condition C do not apply to the permittee's activities as a generator accumulating hazardous waste for &lt;90 days per OAC rule 3745-52-34(A). Please complete the applicable sections of the Generator Requirements checklist to document compliance with activities associated with &lt;90 day accumulation of wastes.</i>		
<b>CONDITION OF CONTAINERS</b>		
87.	Are containers holding hazardous wastes in good condition as required by OAC 3745-55-71? [Condition C.4] If not:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Did the permittee transfer the hazardous waste from such a container to one that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: "Each operating day" is each day that the tank system is being used to manage (store or treat) hazardous waste.

NOTE: Ancillary equipment required to be provided with secondary containment are described in OAC 3745-55-93(F).

96.	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 permittee documented: [3745-55-95(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Inspections of above ground portion of tank weekly?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Inspections of construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste weekly?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	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 type="checkbox"/>
97.	Where applicable, does the permittee inspect the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter, as required by OAC rule 3745-55-95(G)(1)? [Condition D.6(d)(i)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
98.	Where applicable, does the permittee inspect all sources of impressed current at least bi-monthly as required by OAC rule 3745-55-95(G)(2)? [Condition D.6(d)(ii)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**TANK SYSTEMS – CLOSURE REQUIREMENTS**

99.	If the permittee has closed a tank, was closure completed in accordance with OAC rule 3745-55-97? [Condition D.9]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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**TANK SYSTEMS – STORING IGNITABLE OR REACTIVE WASTES**

100.	For tanks used to treat or store ignitable or reactive wastes, has the permittee complied with one of the following in accordance with OAC rule 3745-55-98(A)? [Condition D.10(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the waste treated before or immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the permittee has conducted such activities in compliance with OAC rule 3745-54-17(B)?; or	Yes <input type="checkbox"/> No <input 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?; or	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Is the tank used solely for emergencies?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
101.	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)? [Condition D.10(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
102.	In accordance with OAC rules 3745-55-99(A), (B) and Condition D.11 of the permit, has the permittee 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?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If so, have the requirements of OAC rule 3745-54-17(B) been met?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**TANK SYSTEMS – WRITTEN ASSESSMENT REQUIREMENTS**

103.	In accordance with OAC rule 3745-55-92(A) and Condition D.3 of the permit, has the permittee obtained and submitted a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: Review the file to see if the written assessment has been previously reviewed and what the results were.

		infiltration or the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	
	iii.	Is liner free of cracks and gaps?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iv.	Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	v.	Are chemically resistant water stops in place at all points? (concrete liners only)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	vi.	Is there a compatible interior coating or lining to prevent migration of waste into the concrete? (concrete liners only)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Vault system as described in OAC rule 3745-55-93(E)(2)? If so,	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	i.	Is vault system designed to contain 100% of the capacity of the largest tank?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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 type="checkbox"/>
	iii.	Are chemically resistant water stops in place at all points?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	iv.	Is there a compatible interior coating to prevent migration into the concrete?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	v.	For <b>ignitable or reactive waste</b> : Is the vault system provided with means to prevent (or alternatively "protect against") the formation or ignition of vapors?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	vi.	Is vault system provided with an exterior moisture barrier?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	Double-walled tank as described in OAC rule 3745-55-93(E)(3)? If so,	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	i.	<u>Is double-walled tank designed as an integral structure to contain any release from the inner tank?</u>	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	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 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 type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	An equivalent device as described in OAC rule 3745-55-93(D)(4) which has been approved by the director?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

### TANK SYSTEMS – SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION

107.	In accordance with OAC rules 3745-55-93(B)(1), (2) and Condition D.4 of the permit, has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, groundwater, or surface water and is it capable of <u>detecting and collecting</u> releases and accumulated liquids?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
108.	Does the secondary containment system meet the following minimum requirements of OAC rule 3745-55-93(C)?: [Condition D.4]		
	a.	Constructed or lined with compatible materials of sufficient strength to prevent failure?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Placed on a foundation or base capable of providing support?	Yes <input 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 the earliest practicable time?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

<i>which can be inspected visually after being put back into service.</i>		
111.	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 permittee obtain a certification from a qualified professional engineer attesting that the repaired unit is capable of handling hazardous waste, as required by OAC rule 3745-55-96(F)? [Condition D.7(c)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
112.	Was a copy of the certification submitted to the director within seven days after returning the system to use, as required by OAC rule 3745-55-96(F)? [Condition D.7(c)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
113.	If the permittee was unable to repair and return the unit to service as described in Questions 110.i and 110.j, was the tank system closed in accordance with OAC rule 3745-55-97?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
114.	Does the permittee 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, did the permittee take following actions as required by OAC rule 3745-55-93(G)(3)? [Condition D.7(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Has the permittee complied with OAC rules 3745-55-96(A) through (F) and decontaminated soils?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. If soils cannot be decontaminated/removed, has the permittee complied with OAC rule 3745-55-97(B)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
115.	Does the permittee 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, did the permittee take following actions as required by OAC rule 3745-55-93(G)(4)? [Condition D.7(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Has the permittee complied with OAC rules 3745-55-96(A) through (D), prevented migration, and decontaminated soil?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the permittee complied with OAC rule 3745-55-97(B)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**CONTAINMENT SYSTEM**

116.	Does the permittee maintain the containment system as described in Section A.1.b of the approved permit application, including: [Condition C.7]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	a. Sufficient capacity to hold 10% of the total volume of containers or the volume of the largest container, whichever is greater?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. A system which is free of gaps and sufficiently impervious to contain leaks and spills?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
117.	Has the permittee had a spill or leak of wastes? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Was spilled or leaked waste removed in a timely manner? [Condition C.7(e)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: This time period is not to exceed 24 hours. [Condition C.7(e)]

**AISLE SPACE**

118.	Is the permittee maintaining adequate aisle space to allow unobstructed movement of personnel and equipment in the event of an emergency as required by OAC rule 3745-54-35 and Condition B.12 of the permit?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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**INSPECTION ITEMS FROM THE PART B APPLICATION**

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.