

**3681**

**U.S. DOE - FEMP  
HAZARDOUS WASTE OH 689 0008 976 HAMILTON  
COUNTY TSD-LQG**

**08/20/92**

**OEPA/DOE-FN**

**4**

**LETTER**



State of Ohio Environmental Protection Agency

**Southwest District Office**

40 South Main Street  
Dayton, Ohio 45402-2086  
(513) 285-6357  
FAX (513) 285-6404

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AUG 21 2 29 PM '92

George V. Voinovich  
Governor

August 20, 1992

RE: U.S. DOE-FEMP  
HAZARDOUS WASTE  
OH 689 0008 976  
HAMILTON COUNTY  
TSD-LQG

Mr. R. E. Tiller, Manager  
Fernald Office  
U.S. DOE-FEMP  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

Dear Mr. Tiller:

On June 24, 1992, I made an initial visit to the U.S. Department of Energy Fernald Environmental Management Project (U.S. DOE-FEMP) installation in order to conduct a RCRA Compliance Evaluation Inspection. Due to the scope of hazardous waste activity, a second visit on July 2, 1992, was necessary to complete the inspection. The purpose of this inspection was to assess the level of compliance with regard to State of Ohio and federal regulations governing the management of hazardous waste stored on-site. I apologize for the delay in your receipt of this correspondence.

For your information, I have enclosed a copy of the checklists used to complete the inspection.

The results of the inspection are as follows, please note that any documented violations of hazardous waste regulations are prefaced with the appropriate Ohio Administrative Code (OAC) citation:

VIOLATIONS:

1. OAC 3745-59-50, Prohibitions on storage of restricted wastes;

This regulation prohibits the storage of hazardous wastes restricted from land disposal unless certain conditions are met.

U.S. DOE-FEMP is storing LDR wastes on-site. It is recognized that the lack of national treatment capacity for mixed wastes necessitates long term storage of LDR hazardous waste at the facility, however, OEPA wishes to document this

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technical violation in light of the recent DOE application to U.S. EPA for a case-by-case extension to LDR storage requirements.

2. OAC 3745-65-15(D), General Inspection Requirements;

This rule requires the owner/operator to record the results of facility inspections, and states in part, "at a minimum, these records shall include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions."

A records review of the facility's program for mandated inspections revealed an inconsistency with a requirement of the rule. The records review noted a few instances where U.S. DOE-FEMP inspection observations documented undesirable conditions, but there were no follow-up comments which would indicate the nature of repairs or remedial action taken to alleviate the conditions or problems.

Within fifteen (15) days of your receipt of this letter, please submit a response to this office which will document correction of this violation. This can be accomplished by an appropriate notice to facility inspection staff, increased emphasis of this rule in training classes, etc.

ISSUES:

1. Re. Nitric Acid Rail Car and HF Tank Car.

U.S. DOE-FEMP has designated these two rail cars as Hazardous Waste Management Units (HWMU). During the inspection, facility representatives explained plans to relocate these units to an on-site rail sump area. This relocation is being considered because of concerns regarding possible structural deterioration of the rail cars.

Under conditions of the Consent Decree, U.S. DOE-FEMP has submitted compliance schedules which set forth timetables for implementing various hazardous waste requirements for HWMU's. The schedules call for the transfer and subsequent management of any wastes remaining in these units by specific dates. Transfer of waste from the Nitric Acid Rail Car is to occur by 9/30/94, and from the HF Tank Car by 10/29/93.

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OEPA requests that U.S. DOE-FEMP revise the timetables to allow for the removal and transfer of waste in these units on an accelerated schedule. Please contact me within seven (7) days of your receipt of this letter to set up a meeting or conference call where an accelerated schedule can be discussed and finalized.

2. Re. Container Stacking.

Because of constraints on available storage space, the facility has begun fourth level stacking of hazardous waste containers in certain areas of the Plant 1 Pad (covered structures). U.S. DOE-FEMP informed OEPA of this procedure in a letter dated June 25, 1992.

OEPA has concerns in regard to safety aspects of this practice, (ie. container integrity). During the inspection facility representatives indicated that safety concerns had been fully assessed prior to implementing the new storage procedure. This office requests copies of all documentation in regard to this issue, within fifteen (15) days of your receipt of this letter.

3. Re. Inspection of automated sprinkler fire protection systems in hazardous waste storage areas.

Within fifteen (15) days of your receipt of this letter, this office requests information regarding the nature and frequency of operational testing of automated sprinkler fire protection systems in those hazardous waste storage areas so equipped.

4. Re. Management of containers.

Paragraph 3.8(c) of the Proposed Amended Consent Decree (DOE Review Draft dated 10/1/91) addresses requirements for temporary dikes or liners utilized as containment measures on the Plant 1 Pad.

During the inspection of the Plant 1 Pad "overpacking" area, it was noted that one storage bay had the end of the containment (herculite sheeting/PVC pipe) removed. It is recognized there is a standard operating procedure (SOP) for "take down" of the containment dike when transporting containers into, or out of, the storage bay. At the time of the inspection however, there was no apparent container transport activity in progress.

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Within fifteen (15) days of your receipt of this letter, please submit a written response which will explain the facility SOP's for maintaining compliance with the PACD requirement, while allowing for container movement into, or out of, containment areas.

5. Re. Management of containers.

During the course of the inspection, it was noted that four containers (55-gal) of waste from recent well drilling operations (close to the Health and Safety Building) had for several days been left at the drilling sites. The containers were labeled as hazardous waste. During the post-inspection meeting, facility representatives indicated that the reason the containers had not been moved to a container storage area in a timely fashion was because of an administrative hold on all intra-facility container transport. The transport hold was due to an recent incident involving pressure build-up within a single container of low-level radiological waste.

Within fifteen (15) days of your receipt of this letter, please submit a written response to this office which will explain how this situation was rectified.

Should you have questions concerning this inspection, please do not hesitate to contact me at (513) 285-6090.

Sincerely,



Phillip C. Harris  
Division of Hazardous Waste Management

cc: Laurie Stevenson, RCRA Enforcement, CO

RCRA HAZARDOUS WASTE FACILITY  
COMPLIANCE EVALUATION INSPECTION CHECKLIST

Facility: U.S. DOE - FEMP

USEPA I.D.: OH6890008976 HWFB No.: \_\_\_\_\_

Street: 7400 WILEY RD. MAILING: P.O. BOX 398705  
CINCINNATI, OH, 45239-8705

City: FERNALD, State: OHIO Zip: \_\_\_\_\_

County: HAMILTON Telephone: (513) 738-6322

Fax No.: \_\_\_\_\_ FUCO No.: \_\_\_\_\_

Owner/Operator: U.S. DOE / CO-OP: DOE & WEMCO

Street: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone: \_\_\_\_\_ Fax: \_\_\_\_\_

Inspection Date: 6 24 92 Time: 1100 - 1645  
7 1 2 92 0930 - 1630

Advance notice of inspection given? (yes) \_\_\_\_\_ (no)

If so, how far in advance? \_\_\_\_\_

Name	Agency/Title	Phone
Inspectors: PHIL HARRIS	OEPA SWDO/ESTI	(513) 285-6090
PAUL PARDI	OEPA SWDO/GL	(513) 285-6357
Facility Representative: DAVE RAST	DOE	(513) 738-6740

STATUS

Cond. Ex. SQG \_\_\_\_\_ SQG \_\_\_\_\_ Large Quantity Generator

Treatment \_\_\_\_\_ Storage  Disposal \_\_\_\_\_ Transporter \_\_\_\_\_

Part A Permit: (yes)  (no) \_\_\_\_\_ Part B Permit: (yes) \_\_\_\_\_ (no) \_\_\_\_\_

LDR Checklist Attached: (yes)  (no) \_\_\_\_\_

SUBMITTA  
\* UNDER  
REVIEW

ACTIVITIES

Containers  Used oil burner \_\_\_\_\_

Tanks \* \_\_\_\_\_ Hazardous waste fuel burner/blender \_\_\_\_\_

Wastepile \_\_\_\_\_ Incineration/Thermal treatment \* \_\_\_\_\_

Landfill \* \_\_\_\_\_ Land treatment \_\_\_\_\_

Surface Impoundment \_\_\_\_\_ Groundwater monitoring \_\_\_\_\_

\* units no longer active.

AUG 26 1992

REMARKS - GENERAL INFORMATION

Include a list of wastes being managed at the site and a brief description of site activity and waste handling procedures:

Part A waste codes managed at facility are attached.

U.S. DOE-FEMP former uranium processing plant, operations for production have ceased. Facility activity is now entirely related to storage of radiological and mixed wastes generated by DOE during production, and CERCLA activity regarding site remediation/restoration.

Facility Part B application for storage of hazardous waste is currently in the review process.

PERMIT STATUS



**GENERAL REQUIREMENTS**

Y/N/NA RMK #

- 1. Has the owner/operator submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?

Y \_\_\_\_\_

When was the owner/operator's Part A submitted:  
*Part A is updated periodically per Consent Decree.  
 Latest revision submitted March 31, 1992*

- 2. Is the owner/operator operating in compliance with the terms and conditions of its HWFB permit?

NA \_\_\_\_\_

If not, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51?

| \_\_\_\_\_

If yes, what date was the PCR submitted? \_\_\_\_\_

- 3. Has the owner/operator submitted a Part B?

Y \* C/TA Round 1 Review Completed

**PERMIT BY RULE REQUIREMENTS**

- 4. Has there been a rule or statute change which has caused the owner/operator to become subject to Ohio's hazardous waste facility permitting requirements?

NA \_\_\_\_\_

a. If so, please describe the rule change below:

b. What was the effective date of the rule or statute change in Ohio?

c. Did the owner/operator submit a Part A to the Director in accordance with the requirements of OAC rule 3745-50-40 (C) (D)?

| \_\_\_\_\_

**NOTE:** In accordance with 3745-50-40 (D), owners/operators are required to submit the Part A within 30 days after the date they first become subject to Ohio's TSD facility standards. Small quantity generators who treat, store or dispose of wastes were required to submit a Part A by the effective date OAC Rule 3745-50-40. [See OAC Rule 3745-50-40]

d. Did the owner/operator notify the US EPA of its hazardous waste activity? [3745-50-40 (C) (1) (a)]

| \_\_\_\_\_

i. What was the date of notification? \_\_\_\_\_



OAC 3745-65-et seq. GENERAL FACILITY STANDARDS**IDENTIFICATION NUMBER (OAC 3745-65-11)**

Y/N/NA RMK #

1. Has the facility owner/operator received an identification number from Ohio EPA (or US EPA) as required by OAC 3745-65-11?

Y \_\_\_\_\_

**ANNUAL REPORT REQUIREMENT (OAC 3745-65-75)**

2. Has the owner/operator submitted an annual Treatment-Storage-Disposal report to the Director of Ohio EPA by March 1st of each calendar year? [3745-65-75]

Y \_\_\_\_\_

**WASTE ANALYSIS/WASTE ANALYSIS PLAN (OAC 3745-65-13)**

3. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat, store or dispose of the waste as required by 3745-65-13(A) (1)?
4. Is the waste analysis repeated when a process or operation generating hazardous waste changes? [3745-65-13(A) (3) (a)]
5. For off-site facilities; Is the waste analysis repeated when results of inspections under 3745-65-13(A) (4) reveal hazardous waste received at the facility does not match the waste designated on the accompanying manifest? [3745-65-13(A) (3) (b)]
6. Does o/o have a written waste analysis plan which includes the following information [3745-65-13(B) (1) through (6)]:
- a. The parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters? [3745-65-13(B) (1)]
- b. The test methods to be used? [3745-65-13(B) (2)]
- c. The sampling method which will be used, either one of the sampling methods described in Appendix I of 3745-51-20 or an equivalent method as defined in OAC 3745-50-10? [3745-65-13(B) (3) (a) (b)]
- d. The frequency with which the initial analysis of the waste will be reviewed/repeated to ensure that the analysis is accurate and up-to-date? [3745-65-13(B) (4)]
- e. **FOR OFF-SITE FACILITIES:** The waste analysis that hazardous waste generators have agreed to supply? [3745-65-13(B) (5)]

Y \_\_\_\_\_

NA \_\_\_\_\_

NA # 1 \_\_\_\_\_

Y \_\_\_\_\_

Y \_\_\_\_\_

Y \_\_\_\_\_

Y \_\_\_\_\_

NA # 1 \_\_\_\_\_

9

f. **FOR OFF-SITE FACILITIES:** The sampling methods and procedures which 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 [3745-65-13(C)]?

NA #1

g. **FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER 3745-59-04 (A):**

NA

Does the waste analysis plan include procedures and schedules for:

- i. The sampling of impoundment contents? [3745-65-13(B)(7)]
- ii. The analysis of test data? [3745-65-13(B)(7)]
- iii. 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 (3745-59-44) or where no treatment standards have been established? [3745-65-13(B)(7)]

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

h. **Where applicable:** The methods which will be used to meet the additional waste analysis requirements of rules 3745-59-07, 3745-67-25, 3745-67-52, 3745-67-73, 3745-68-14, 3745-68-41, 3745-68-75 and 3745-69-02 of the OAC? [3745-65-13(B)(6)]

NA

**WASTE ANALYSIS PLAN - LDR REQUIREMENTS**

**NOTE:** The following requirements identified in Question #7 apply to both on-site and off-site TSD facilities.

7. In accordance with OAC Rule 3745-65-13(B)(6), does the the facility's waste analysis plan includes analytical procedures necessary to ensure compliance with the land disposal restriction requirements of Chapter 3745-59, including:

- a. Procedures for conducting the TCLP for wastes which have a CCWE treatment standard?
- b. Procedures for conducting a total constituent analysis for wastes which have a CCWE treatment standard?

Y

Y

**REMARKS - WASTE ANALYSIS REQUIREMENTS**

1) ALTHOUGH THE FACILITY HAS, IN THE PAST, ACCEPTED SOME OFF-SITE WASTE (MIXED WASTE/RADS FROM OTHER DOE FACILITIES), THE FACILITY DOES NOT ROUTINELY OPERATE AS AN OFF-SITE FACILITY. OFF-SITE WASTES ARE NOT CURRENTLY RECEIVED. OFF-SITE STATUS TO BE DETERMINED.





GENERAL INSPECTION REQUIREMENTS (OAC 3745-65-15)

Y/N/NA RMK #

1. Does the o/o inspect the facility on a weekly basis for malfunctions, deterioration, operator errors and discharges which may cause a release of hazardous waste or hazardous waste constituents or may pose a threat to human health? [3745-65-15(A) (1) (2)] If so,

Y  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

a. Are the inspections recorded in an inspection log or summary as required by 3745-65-15(D)? [3745-65-15(A)]

b. Do records contain date and time of inspection, name of inspector, notation of observations made and date and nature of any repairs or remedial actions as required by 3745-65-15(D)? [3745-65-15(A)]

c. Are inspection records maintained at the facility for at least (3) years as required by 3745-65-15(D)? [3745-65-15(A)]

2. Has the owner/operator developed a written inspection schedule for inspecting; monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment (e.g. dikes, sumps)? [3745-65-15(B)] If so,

Y  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

a. Is the schedule kept at the facility? [3745-65-15(B) (2)]

b. Does the schedule identify the types of problems which are to be looked for during the inspection? [3745-65-15(B) (3)]

c. Does the schedule include inspection of areas subject to spills (i.e. loading and unloading areas) daily when in use and according to other applicable regulations when not in use? [3745-65-16(B) (4)]

NOTE: See Preparedness and Prevention checklist for additional testing/recordkeeping requirements applicable to emergency equipment.

REMARKS - GENERAL INSPECTION REQUIREMENTS

**PERSONNEL TRAINING (OAC 3745-65-16)**

**Y/N/NA RMK #**

1. Does the facility provide a personnel training program in compliance with 3745-65-16(A) (B) (C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan?
2. Does the facility provide personnel training to new employees within 6 months after the date of their employment as required by 3745-65-16(B)?
3. Does the facility provide an annual training program refresher course as required by 3745-65-16(B)?
4. Does the facility keep all of the records required by 3745-65-16(D) (E) including written job titles, job descriptions and documented employee training records?

Y	_____
	_____
	_____
	_____
	_____

**REMARKS - PERSONNEL TRAINING**



PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)

Y/N/NA RMK #

1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] Y
  
2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection? Y
  
- a. If yes, was the contingency plan implemented? [3745-65-51 (B)] *Small fire in boiler plant 1-20-92, Facility Emergency Plan activated, but not the Contingency Plan, due to incident location, i.e. not* N
3. If required due to actual hazards associated with the waste, does the facility have the following equipment: *in area affected by hazardous waste.* [3745-65-32 (A) (B) (C) (D)]
  - a. Internal alarm system? Y
  - b. Access to telephone, radio or other device for summoning emergency assistance? |
  - c. Portable fire control equipment, spill control and decontamination equipment? |
  - d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers? |
4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33 (A)] |
  - a. Does the facility keep an equipment testing log required by 3745-65-33 (B), including date and time of test, observations made, and date and nature of any repairs? |
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device? [3745-65-34] |
6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35] |
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37 (A)] |

Y/N/NA RMK #

8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented?  
[OAC 3745-65-37(B)]

NA \_\_\_\_\_

REMARKS - CONTINGENCY PLAN/PREPAREDNESS AND PREVENTION REQUIREMENTS



SECURITY REQUIREMENTS (OAC 3745-65-14)

Y/N/NA RMK #

- 1. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)]
- b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)]

Y \_\_\_\_\_

Y \_\_\_\_\_

IF BOTH 1A AND 1B ARE NO, MARK QUESTIONS 2 AND 3 NOT APPLICABLE.

- 2. Does the facility have -
  - a. A 24-hour surveillance system, or;
  - b. An artificial or natural barrier and a means to control entry at all times? [3745-65-14(B)(2)(a)(b)]
- 3. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary? [3745-65-14(C)]

Y \_\_\_\_\_

↓ \_\_\_\_\_

↓ \_\_\_\_\_

REMARKS - SECURITY REQUIREMENTS

USE AND MANAGEMENT OF CONTAINERS (OAC 3745-66-70 TO 3745-66-77) Y/N/NA RMK #

1. Are hazardous wastes stored in containers which are:
    - a. Closed? [3745-66-73(A)] Y \_\_\_\_\_
    - b. In good condition? [3745-66-71] J \_\_\_\_\_
    - c. Compatible with wastes stored in them? [3745-66-72] J \_\_\_\_\_
  2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] Y \_\_\_\_\_
  3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] Y \_\_\_\_\_
  4. Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] Y \_\_\_\_\_
  5. Is the facility recording inspections described in Question #4 in an inspection log or inspection summary as required by OAC 3745-66-74(B) which contains the following information:
    - a. Date and time of inspections? Y \_\_\_\_\_
    - b. Name of inspector? Y \_\_\_\_\_
    - c. Notation of observations made during the inspection? Y \_\_\_\_\_
    - d. The date and nature of any repairs or other remedial action? Y & N # 2 \_\_\_\_\_
  6. Are ignitable and/or reactive hazardous waste(s) being managed at the facility? If so,
    - a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] J \_\_\_\_\_
- NOTE: OAC Rule 3745-66-76 as referenced in Question 6.a. does not apply to Small Quantity Generators (except for wastes accumulated in a satellite accumulation area). [See OAC Rules 3745-52-34(D) (2) and (C) (1) (a)].
- b. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] Y \_\_\_\_\_

SPECIAL REQUIREMENTS FOR IGNITABLE/REACTIVE/INCOMPATIBLE  
WASTES (OAC 3745-65-17)

Y/N/NA RMK #

NOTE: The following requirements are generally applicable to TSD facilities only. See OAC Rule 3745-66-992(F)(2) for applicability of ignitable/reactive/incompatible waste requirements for SQGs accumulating hazardous waste in tanks.

1. If ignitable, reactive or incompatible wastes are handled, does the facility meet the following requirements?  
[3745-65-17]

- a. Wastes are protected from sources of ignition and/or reaction?
- b. Physical separation of incompatible waste materials?
- c. "No Smoking" or "No Open Flames" signs are placed near areas where ignitable or reactive wastes are handled?
- d. Commingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B)?

Y	_____
	_____
	_____
	_____
	_____

REMARKS - IGNITABLE/REACTIVE/INCOMPATIBLE WASTE REQUIREMENTS

2) A review of HWMU inspection logs indicated the facility is in substantial compliance with OAC 3745-66-74(B), however several instances were noted where follow-up information re. date and nature of repairs/remedial actions were not noted on log forms. Each of these instances concerned minor observations of unacceptable conditions.

OAC 3745-66 CLOSURE AND POST CLOSURE

Y/N/NA RMK #

- |   | Y/N/NA | RMK # |
|---|--------|-------|
| 1. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12]?   | *      | #3    |
| a. A description of how each hazardous waste management unit will be closed in accordance with 3745-66-11?  | N      |       |
| b. A description of how final closure will meet the requirements of 3745-66-11?   | *      |       |
| c. An estimate of the maximum amount of hazardous waste ever in inventory?  | Y      |       |
| d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues?   | Y      |       |
| e. The year closure is expected to begin and a schedule for the various phases of closure?  | N      |       |
| f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control?  | Y      |       |
| 2. Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)]  | NA     |       |
| 3. Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director 180 days prior to beginning the closure process? [3745-66-12(D)]  | NA     |       |
| 4. Has the closure plan (and post-closure plan, if applicable) for any non land disposal unit(s) been submitted to the Director 45 days prior to beginning the closure process? [3745-66-12(D)]   | Y      |       |
| 5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)]  | NA     |       |
| 6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)]   | NA     |       |
| 7. Did the owner/operator submit to the Director, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] | NA     | ✓ 21  |

8. Did the owner/operator submit to the local zoning authority and the Director a survey plat in accordance with OAC 3745-66-16?

NA

9. What permitted units at the facility have been closed in accordance with an approved closure plan?

NA. No units have been permitted to date.

HWMU's closed; BaCl<sub>2</sub> storage tanks, Waste Pit 4

10. If closure was partial, list the regulated units which remain in use at the facility:

Appx. 40 inactive HWMU's

and 7 active HWMU's (container storage)

11. If required, has the facility prepared a written post-closure plan? [3745-66-18]

\* NA #3

If so, does the post-closure plan include:

a. A description of proposed ground water monitoring?

b. A description of planned maintenance activities?

c. The name, address and phone number of person/office to contact during the post-closure period?

↓

12. For disposal facilities; has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19]

NA

13. Has the owner of the property on which a disposal unit is located recorded on the deed that:

a. The land has been used to manage hazardous waste and the type, quantity and location of waste?

NR

b. Land use is restricted under closure and post-closure rules? [3745-66-19]

NR

REMARKS - CLOSURE/POST CLOSURE REQUIREMENTS

\* 3) Facility is subject to CERCLA remediation process. RCRA closures for HWMU's are submitted per Consent Decree schedules. Final Facility closure dates & methods are subject to CERCLA process. 22

GENERATOR CLASSIFICATION (OAC 3745-52-34)

Does the facility:

1. Generate < 100 Kg (25-30 gallons) of hazardous waste in a calendar month?

(yes) \_\_\_\_\_ (no) 

If so, the facility is classified as a Conditionally Exempt Small Quantity Generator, unless 3.b. applies. Please complete the Conditionally Exempt Small Quantity Generator Requirements checklist.

2. Generate between 100 and 1000 Kg of hazardous waste in a calendar month? (about 25 to under 300 gallons)

(yes) \_\_\_\_\_ (no) 

If so, the facility is classified as a Small Quantity Generator, unless 3.b. applies. Please stop here and complete the Small Quantity Generator Requirements checklist.

3. a. Generate > 1000 Kg (~ 300 gallons) of hazardous waste in a calendar month?

(yes)  (no) \_\_\_\_\_

or;

- b. Generate > 1 Kg of acutely hazardous waste in a calendar month?

(yes) \_\_\_\_\_ (no) \_\_\_\_\_

If so, the facility is classified as a Large Quantity Generator. Please complete the Large Quantity Generator Requirements checklist.

REMARKS - GENERATOR CLASSIFICATION

# FACILITY INSPECTION WASTE MANAGEMENT ACTIVITIES SUMMARY

DESCRIPTION OF WASTE      ON SITE MANAGEMENT      OFF SITE MANAGEMENT

EPA WASTE CODE	QTY GEN PER MO.	PROCESS/ACTIVITY GENERATING WASTE	GENERATOR			TSD	TYPE OF ON-SITE TREATMENT (WHERE APPLICABLE)	RECYCLED	CONTAINER	L-PROGRAM	TANK	RATE PER L	LANDFILL	DESCRIPTION OF OFF SITE MANAGEMENT
			LESS THAN 90 DAYS	LESS THAN 180 DAYS	LESS THAN 270 DAYS									

OAC 3745-52 - LARGE QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11)

Y/N/NA RMK #

1. Have wastes generated at the facility been evaluated in compliance with the waste evaluation requirements of OAC rule 3745-52-11(A) (B) and (C)?

\* Y             
*on-going program of Characterization per Consent Decree*

(a) Has the generator's evaluation identified in Question #1 included an evaluation for the (TC) Toxicity Characteristics identified in 3745-51-24? [3745-52-11(C)]

Y           

NOTE: The TC rule requirement noted above must include an evaluation of the metal as well as organic TC constituents identified in 3745-51-24.

If not, specify those waste streams which the generator has failed to adequately evaluate:

2. Are any wastes generated at the facility identified by the generator as being excluded from regulation under Rule 3745-51-04?

\* N           

If so, specify those waste streams identified by the generator as being excluded under 3745-51-04:

\* *Site stores radiological wastes regulated by AEC/NRC/DOE.*

3. Is the facility generating any wastes which are identified as recyclable materials as defined in OAC 3745-51-06 (A)?

N           

If so, please identify these waste streams below:

- 4. In accordance with OAC rule 3745-51-02(E), is the generator recycling any materials on-site by:
  - a. Using or reusing the material as an ingredient in an industrial process to make a product?
    - i. If so, is the material being reclaimed before it is used or reused?
  - b. Using the material as a substitute for commercial products?
  - c. Returning the material to the original process from which it was generated as a substitute for a raw material feedstock?
    - i. If so, is the material reclaimed before returning to the original process?

N  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**NOTE:** The materials identified in Question #4 may not be considered wastes if recycled as described above, unless the conditions identified in Questions 4(a)(i) or 4(c)(i) are true. See O.A.C. Rule 3745-51-02(E).

Please identify those materials that the generator is recycling as described in 4.a., 4.b. and/or 4.c. below:

- 5. Has the generator identified any waste treatment activity as being excluded from regulation because of totally enclosed treatment or via operation of an elementary neutralization unit and/or wastewater treatment unit as described in Rule 3745-65-01?

N  
 \_\_\_\_\_

If so, specify those waste treatment activities which the generator has identified as being excluded from regulation:

**GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)**

- 6. Prior to treating, storing, disposing, transporting or offering to transport hazardous waste, has the generator obtained a generator identification number from US EPA or Ohio EPA as required by 3745-52-12?

Y  
 \_\_\_\_\_

**GENERATOR ANNUAL REPORT (OAC 3745-52-41)**

- 7. Has the generator filed annual reports to the Director on or before March 1st of each calendar year as required by 3745-52-41?

Y  
 \_\_\_\_\_

HAZARDOUS WASTE IMPORT/EXPORT (OAC 3745-52-50 TO 3745-52-57 AND OAC 3745-52-60)

Y/N/NA ReK #

8. Does the generator import or export hazardous waste?

N

If so, are the wastes handled in accordance with the requirements of 3745-52-50 through 3745-52-57 and 3745-52-60?

REMARKS - HAZARDOUS WASTE IMPORT/EXPORT

PRE-TRANSPORT REQUIREMENTS (OAC 3745-52-30 TO 3745-52-33)

9. Does the generator meet the following pre-transport requirements prior to offering hazardous wastes for transport off-site:

- a. The waste material is packaged, labeled, and marked in accordance with the applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32 (A)]?
- b. Each container with a capacity of 110 gallons or less is affixed with a completed hazardous waste label as required by 3745-52-32 (B)?
- c. Before transporting hazardous wastes off-site or offering hazardous wastes for transportation off-site, does the generator placard or offer the appropriate DOT placards to the initial transporter in compliance with 3745-52-33?

\* Y

REMARKS - PRETRANSPORT REQUIREMENTS

\* Very little transportation of hazardous waste destined for disposal has been accomplished because of the lack of treatment capacity for mixed wastes.

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)

Y/N/NA RMK #

1. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
    - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, US EPA form 8700-22 in compliance with 3745-52-20 (A)?
    - b. The manifest contains all information required by 3745-52-20 and the minimum number of copies required by 3745-52-22?
    - c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20 (C) (D) (E)?
    - d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23 (A) (1) (2)?
  
  2. Has the generator received a return copy of each completed manifest within thirty-five (35) days of the date the waste was accepted by the initial transporter?
    - a. If not, has the generator complied with the manifest exception reporting requirements in 3745-52-42?
- NOTE: The manifest exception reporting requirement identified in Question #2 above is applicable to large quantity generators only. See Question #3 for manifest exception reporting requirements for small quantity generators.
3. If the generator is acting as a small quantity generator, (> 100 kg but < 1000 kg of hazardous waste in a calendar month) has the generator received a return copy of each completed manifest within sixty days of receipt by the initial transporter? [3745-52-42(B)]
    - a. If not, did the generator submit a legible copy of the manifest with some indication that the generator has not received confirmation of delivery to the Ohio EPA? [3745-52-42(B)]
  
  4. Are signed copies of all hazardous waste manifests and any documentation required for Exception Reports retained for at least 3 years as required by 3745-52-40?

	Y	
	Y	
	-	
	-	
	NA	
	-	
	Y	

## GENERATOR CLOSURE REQUIREMENTS (3745-52-34)

Y/N/NA RMK #

1. Has the generator closed any < 90-day accumulation unit(s) since date of last inspection?

N/ \_\_\_\_\_

If so, describe the unit(s) which the generator has closed:

2. If the generator has closed any < 90-day accumulation unit(s) as described in Question #1, was closure completed to meet the closure performance standard of 3745-66-11? [3745-52-34 (A) (1)]

NA \_\_\_\_\_

Please provide a description of the type of documentation provided by the generator to confirm that closure was completed in accordance with the closure performance standard:

3. If the < 90 day unit closed was a tank system, did the generator also complete closure in accordance with the tank system closure requirements of 3745-66-97(A) and (B)? [3745-52-34 (A) (1)]

NA \_\_\_\_\_

REMARKS - GENERATOR CLOSURE REQUIREMENTS

**PERSONNEL TRAINING (OAC 3745-65-16)**

**Y/N/NA RMK #**

1. Does the generator provide a personnel training program in compliance with 3745-65-16(A) (B) (C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan? [3745-52-34(A) (4)]
2. Does the generator provide personnel training to new employees within 6 months after the date of employment as required by 3745-65-16(B)? [3745-52-34(A) (4)]
3. Does the generator provide an annual refresher training course as required by 3745-65-16(B)? [3745-52-34(A) (4)]
4. Does the generator keep all the records required by 3745-65-16(D) (E) including; written job titles, job descriptions and documented employee training records? [3745-52-34(A) (4)]

Y	

**REMARKS - PERSONNEL TRAINING REQUIREMENTS**

GENERATOR ACCUMULATION IN CONTAINERS AND TANKS  
(OAC 3745-52-34)

Y/N/NA RMK #

1. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a permit as provided under 3745-52-34, are the following requirements met:

a. The containers or tanks are clearly marked with the words "Hazardous Waste?" [3745-52-34 (A) (3)]

NA  
|  
|

b. The date that accumulation began is clearly marked on each container? [3745-52-34 (A) (2)]

In addition, OAC 3745-52-34 (A) (1) also requires generators accumulating hazardous waste(s) in containers < 90 days to comply with the "Container Management" Rules of OAC 3745-66-70 to 3745-66-77. If the generator is accumulating hazardous waste(s) in containers, please complete Management of Containers checklist to document compliance with these requirements.

2. Is the generator accumulating hazardous waste(s) in tanks?

✓

If so, OAC 3745-52-34 (A) (1) requires generators to comply with rules 3745-66-90 to 3745-66-992 except paragraph (C) of rule 3745-66-97 and rule 3745-66-991.

If the generator is accumulating hazardous waste(s) in tanks, complete the Tank System Requirements checklist to document compliance with these requirements.

3. Has the generator accumulated hazardous wastes in excess of ninety (90) days?

\* Y

a. If so, has the generator been granted an extension by the Director for accumulation in excess of (90) days?

NA

REMARKS - GENERATOR ACCUMULATION REQUIREMENTS

\* GENERATOR IS TSD storing mixed wastes.

- 7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)] \_\_\_\_\_
  
- 8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented? [3745-65-37(B)] \_\_\_\_\_

REMARKS - CONTINGENCY PLAN/PREPAREDNESS AND PREVENTION REQUIREMENTS

*See HW Facility Checklist*



USE AND MANAGEMENT OF CONTAINERS (OAC 3745-66-70 TO 3745-66-77) Y/N/NA RMK #

- Checklist*
1. Are hazardous wastes stored in containers which are:
    - a. Closed? [3745-66-73(A)] \_\_\_\_\_
    - b. In good condition? [3745-66-71] \_\_\_\_\_
    - c. Compatible with wastes stored in them? [3745-66-72] \_\_\_\_\_
  2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] \_\_\_\_\_
  3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] \_\_\_\_\_
  4. Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] \_\_\_\_\_
  5. Is the facility recording inspections described in Question #4 in an inspection log or inspection summary as required by OAC 3745-66-74(B) which contains the following information:
    - a. Date and time of inspections? \_\_\_\_\_
    - b. Name of inspector? \_\_\_\_\_
    - c. Notation of observations made during the inspection? \_\_\_\_\_
    - d. The date and nature of any repairs or other remedial action? \_\_\_\_\_
  6. Are ignitable and/or reactive hazardous waste(s) being managed at the facility? If so,
    - a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] \_\_\_\_\_
    - b. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] \_\_\_\_\_

**NOTE:** Small Quantity Generators are not required to comply with OAC Rule 3745-66-67 (except for wastes being accumulated in satellite accumulation areas). [See OAC Rules 3745-52-34(D) (2) and (C) (1) (a)]

**SATELLITE ACCUMULATION AREA REQUIREMENTS  
(OAC 3745-52-34 (C))**

Y/N/NA RMK #

- 1. Has the facility elected to accumulate hazardous waste at or near a point of generation which is under the control of the operator of the process generating the waste? (defined as satellite accumulation)

Y \_\_\_\_\_

If so, are the following requirements of OAC 3745-52-34(C) being met:

- a. Quantities of waste accumulated do not exceed 55 gallons at any time?
- b. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?
- c. The generator has marked the containers with words "Hazardous Waste" or with other words identifying the contents of the container?

Y  
\_\_\_\_\_  
Y  
\_\_\_\_\_  
Y  
\_\_\_\_\_

If the facility is maintaining satellite accumulation areas as identified in 1.a. and 1.b. above, OAC 3745-52-34(C) also requires that the container(s) in these areas be managed in compliance with the "Container Management" requirements of OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76 and 3745-66-77. Please complete the Use and Management of Containers checklist to document compliance with these requirements.

- 2. Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 1.a or 1.b?

N \_\_\_\_\_

- a. If so, did the generator comply with 3745-52-34(A) within three (3) days? and;

NA \_\_\_\_\_

- b. Upon accumulating > 55-gallons of waste, did the generator mark the container holding the excess hazardous waste with the date the excess began accumulating?

/ \_\_\_\_\_

**REMARKS - SATELLITE ACCUMULATION REQUIREMENTS**

USE AND MANAGEMENT OF CONTAINERS (OAC 3745-66-70 TO 3745-66-77) Y/N/NA RMK #

- Checklist*
1. Are hazardous wastes stored in containers which are:
    - a. Closed? [3745-66-73(A)] \_\_\_\_\_
    - b. In good condition? [3745-66-71] \_\_\_\_\_
    - c. Compatible with wastes stored in them? [3745-66-72] \_\_\_\_\_
  2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] \_\_\_\_\_
  3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] \_\_\_\_\_
  4. Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] \_\_\_\_\_
  5. Is the facility recording inspections described in Question #4 in an inspection log or inspection summary as required by OAC 3745-66-74 (B) which contains the following information:
    - a. Date and time of inspections? \_\_\_\_\_
    - b. Name of inspector? \_\_\_\_\_
    - c. Notation of observations made during the inspection? \_\_\_\_\_
    - d. The date and nature of any repairs or other remedial action? \_\_\_\_\_
  6. Are ignitable and/or reactive hazardous waste(s) being managed at the facility? If so,
    - a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] \_\_\_\_\_
    - b. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] \_\_\_\_\_

**NOTE:** Small Quantity Generators are not required to comply with OAC Rule 3745-66-67 (except for wastes being accumulated in satellite accumulation areas). [See OAC Rules 3745-52-34(D) (2) and (C) (1) (a)]



NO MIGRATION PETITION

Y/N/NA RMK#

3. Has the entity received a variance from US EPA to allow for continued land disposal of untreated LDR wastes based upon a demonstration that there will be no migration from the disposal unit pursuant to 40 CFR 268.6? If yes,

NA

(a) List the waste(s) affected:

(b) Has the entity's "no migration" demonstration been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-06(C)]

NOTE: Until the no migration petition has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

PROHIBITION AGAINST DILUTION

4. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [O.A.C. Rule 3745-59-03; 40 CFR 268.3]

(a) As a substitute for adequate treatment to achieve compliance with LDR treatment standards?

N

(b) To circumvent the effective date of a prohibition (e.g. to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)?

(c) To otherwise avoid a prohibition in O.A.C. Rules 3745-59-30 through 3745-59-35 (40 CFR 268.30 through 268.35)?

(d) To otherwise avoid a prohibition imposed by Section 3004 of RCRA?

NOTE: If the answer to any of the Questions 4(a) through 4(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of O.A.C. Rule 3745-59-03 (40 CFR 268.3).

NOTE: Dilution of wastes is permissible under some conditions. See O.A.C. Rule 3745-59-03(B) (40 CFR 268.3) and the Third Third final rule preamble for additional information.

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

**NOTE:** The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate Land Disposal Restricted wastes that do not meet treatment standards in tanks or containers. A large quantity generator who stores LDR wastes on-site for greater than 90 days becomes an operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.

**NOTE:** The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [O.A.C. Rule 3745-59-50(E); 40 CFR 268.50(e)]

	Y/N/NA	RMK#
1. Is the owner/operator storing land disposal restricted wastes in containers? If so, is each container marked with the following information in accordance with O.A.C. Rule 3745-59-50(A)(2)(a) (40 CFR 268.50(a)(2)(i)):	Y	
(a) The identification of the contents?		
(b) The date which accumulation began?		
2. Is the owner/operator storing land disposal restricted wastes in tanks? If so, is each tank marked with the following information in accordance with O.A.C. Rule 3745-59-50(A)(2)(b) (40 CFR 268.50(a)(2)(ii)):	N	
(a) A description of its contents?	NA	
(b) The quantity of each hazardous waste received?		
(c) The date each period of accumulation begins? or;		
(d) Is the information required by 2(a), 2(b) and 2(c) being recorded and maintained in the facility's operating record? [O.A.C. Rule 3745-59-50(A)(2)(b); 40 CFR 268.50(a)(2)(ii)]		
3. Are land disposal restricted wastes being stored at the facility for greater than one year? If so,	Y	#4
(a) Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [O.A.C. Rule 3745-59-50(A)(1); 40 CFR 268.50(a)(1)]	N	

NOTE: A TSE facility may store Land Disposal Restricted wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [O.A.C. Rule 3745-59-50(B)] During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.

The requirements of O.A.C. Rule 3745-59-50(C) (40 CFR 268.50(c)) found in Question #3 do not apply to those facilities that store hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm. Please go to Question #4 for applicable requirements.

Y/N/NA RMK#

4. Does the owner/operator store liquid hazardous wastes which also contain PCBs at concentrations greater than or equal to 50 ppm for greater than 90 days (180/270 days if SQG)?  
If so,

Y #4

(a) Does the facility remove from storage and treat or dispose of such PCB hazardous wastes within one year from the date that the wastes were initially placed in storage? [O.A.C. Rule 3745-59-50(F); 40 CFR 268.50(f)]

N #4

NOTE: In addition to complying with the requirement found in Question 4(a), the facility must also meet the requirements of 40 CFR 761.65(b). [O.A.C. Rule 3745-59-50(F); 40 CFR 268.50(f)]

REMARKS

4) Facility via U.S. D.O.E. has applied for a case-by-case extension to LDR storage, because of a lack of national treatment capacity for mixed waste. Decision on D.O.E. application is pending.

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LDR - GENERATOR REQUIREMENTS

NOTE: The following requirements apply only to large quantity generators and small quantity generators. Conditionally exempt small quantity generators are exempt from land disposal restriction requirements as referenced in O.A.C. Rules 3745-59-01(E) (1) (40 CFR 268.1(e) (1)) and 3745-51-05(B) (40 CFR 261.5(b)).

**EVALUATION OF WASTES/DETERMINING APPROPRIATE TREATMENT STANDARDS**

Y/N/NA RMK#

- 1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]. \* *on-going program of evaluation; Consent Decree*  
  - (a) For determinations based solely on knowledge of the waste: Is supporting data used to make this determination being retained on-site? [O.A.C. Rule 3745-59-07(A) (5); 40 CFR 268.7(a) (5)]
  - (b) For determinations based upon analytical testing: Is a copy of waste analysis data being retained on-site? [O.A.C. Rule 3745-59-07(A) (5); 40 CFR 268.7(a) (5)]
- 2. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g. wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)].
- 3. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]
- 4. Does the entity generate any listed waste(s) which are restricted from land disposal? If so,
  - (a) Do such wastes also exhibit hazardous waste characteristics as identified in O.A.C. Rules 3745-51-20 to 3745-52-24? (40 CFR 261.20 through 261.24)?
  - (b) For listed wastes which also exhibit a characteristic: Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [O.A.C. Rule 3745-59-09(A); 40 CFR 268.9(a)]

NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g. a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See O.A.C. Rule 3745-59-09(B); 40 CFR 268.9(b)]

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

Y/N/NA RMK#

5. Does the generator treat characteristic hazardous waste(s) in a RCRA-exempt unit to render such wastes non-hazardous?

N \_\_\_\_\_

(a) If so, are treated waste(s) sent to a licensed solid waste disposal facility?

NA \_\_\_\_\_

i. If so, with each shipment of waste, does the generator submit a notification and certification to the Regional Administrator/Director which contains the following:

a. Name and address of the facility receiving the waste? [O.A.C. Rule 3745-59-09 (D) (1) (a); 40 CFR 268.9 (d) (1) (i)]

\_\_\_\_\_

b. A description of the waste as initially generated, including EPA hazardous waste numbers and treatability group? [O.A.C. [Rule 3745-59-09 (D) (1) (b); 40 CFR 268.9 (d) (1) (ii)]

\_\_\_\_\_

c. The treatment standards applicable to the waste at the initial point of generation? [O.A.C. Rule 3745-59-09 (D) (1) (c); 40 CFR 268.9 (d) (1) (iii)]

\_\_\_\_\_

ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07 (B) (5) (a) (40 CFR 268.7 (b) (5) (i)? [O.A.C. Rule 3745-59-09 (D) (2); 40 CFR 268.9 (d) (2)]

\_\_\_\_\_

NOTE: An example of a RCRA-exempt unit would include an elementary neutralization unit or a wastewater treatment unit as defined by O.A.C. Rule 3745-50-10. [See O.A.C. Rule 3745-65-01]

REMARKS



Y/N/NA RMK#

9. Is the notification/certification identified in Question #8 submitted with each shipment of waste? [O.A.C. 3745-59-07 (A) (2); 40 CFR 268.7(a) (2)]

Y

10. For wastes subject to a case-by-case extension, exemption or a variance: Does the generator provide written notice to the facility receiving the waste that the waste is not prohibited from land disposal? [O.A.C. Rule 3745-59-07 (A) (3); 40 CFR 268.7(a) (3)]

NA

If so, does the notice contain the following information:

(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07 (A) (3) (a); 40 CFR 268.7(a) (3) (i)]

(b) The corresponding treatment standard and applicable prohibitions? [O.A.C. Rule 3745-59-07(A) (3) (b); 40 CFR 268.7(a) (3) (ii)]

(c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A) (3) (c); 40 CFR 268.7(a) (3) (iii)]

(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A) (3) (d); 40 CFR 268.6(a) (3) (iv)]

(e) The date the waste is subject to the prohibitions? [O.A.C. Rule 3745-59-07(A) (3) (e); 40 CFR 268.7(a) (3) (v)]

11. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least five years? [O.A.C. Rule 3745-59-07(A) (6); 40 CFR 268.7(a) (7)]

Y

REMARKS

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