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RESULTS OF A RCRA COMPLIANCE EVALUATION INSPECTION AT THE DOE-FMPC CONDUCTED AUGUST 2 AND 3, 1989

08/29/89

OEPA DOE-FMPC
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REPORT

OhioEPA
State of Ohio Environmental Protection Agency
Southwest District Office
40 South Main Street
Dayton, Ohio 45402-2086
(513) 449-6357
FAX (513) 449-6249

Original File Copy

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Richard F. Celeste
Governor

August 29, 1989

Re: U.S. DOE-FMPC
HAMILTON COUNTY
HAZARDOUS WASTE
OH6390008976
G-TSD

Mr. James A. Reafsnyder
FMPC Site Office
P.O. Box 398705
Cincinnati, Ohio 45239-8705

Dear Mr. Reafsnyder:

On August 2 and 3, 1989, I conducted a RCRA Compliance Evaluation Inspection (CEI) at DOE-FMPC. I was accompanied by Mr. Eddy Lin and Mr. Rob Foster from PRC (a U.S. EPA contractor). DOE-FMPC and Westinghouse (WMCO) were represented by numerous personnel, with Jack Craig (DOE) and Sue Schneider (WMCO) being the main contacts throughout the course of the CEI. The completed RCRA Interim Status Inspection Form is enclosed for your information.

The findings of my inspection are as follows:

1. FMPC was actively storing hazardous waste (grit blast material) in "90 day" storage areas by the East and West Water Towers. These areas are unpermitted storage units that did not meet preparedness and prevention and contingency plan requirements (OAC 3745-65-30 through 37 and OAC 3745-65-50 through 56). FMPC has the option of maintaining these areas as "90-day" storage areas by complying with the applicable requirements, or can convert these areas to "satellite" accumulation areas by complying with OAC 3745-52-34(C). A third option is to cease the storage of wastes in these areas. Please respond with FMPC's intentions for these areas. Submit this written response to me no later than October 3, 1989.

2. A review of the FMPC operating record (drum inventories) indicated that many wastes in storage have yet to be properly characterized (no waste codes indicated). This violates OAC 3745-52-11 (evaluation of wastes) and OAC 3745-65-73 (operating record requirements). FMPC was actively conducting sampling and analysis of these "suspect" wastes at the time of the inspection. Please submit a written response indicating an anticipated

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schedule for the sampling and analysis of the remaining "suspect" wastes. Upon proper characterization of the wastes, update the operating record accordingly so that all required information is maintained. Submit the written response for my review no later than October 3, 1989.

3. Two container storage violations were noted during the inspection. A drum was discovered in the KC-2 warehouse which was dented to the extent that the integrity of the drum was compromised. This violates OAC 3745-66-71. A drum was discovered in the Plant 6 "satellite" accumulation area which was stored with an unsecured lid. This violates OAC 3745-66-73. Please correct these violations immediately. A follow-up inspection will be conducted in the near future to determine whether FMPC has corrected these violations.

4. FMPC's facility closure plan does not currently describe how each hazardous waste management unit will be closed. Specifically, the closure plan does not address closure of Building 79. This violates OAC 3745-66-12(B). Furthermore, FMPC failed to amend its closure plan at least sixty days prior to a proposed change in facility operation (the use of Building 79 for hazardous waste storage). This is a violation of OAC 3745-66-12(C).

   Keep these requirements in mind in light of FMPC's proposed use of the Plant 8 warehouse for hazardous waste storage. Please amend the facility closure plan and submit it for my review no later than October 17, 1989.

5. The waste analysis plan (WAP) has been reviewed and I have noted the following deficiencies:

   a. The current plan lists typical waste analysis parameters (Table C-4). OAC 3745-65-13(B)(1) requires that the WAP specify the parameters for which <u>each</u> of the hazardous wastes generated or stored at FMPC will be analyzed. Refer to Table C-1 and then list analysis parameters for each of these wastes. Also provide the rationale for the selection of these parameters.

   b. OAC 3745-65-13(A)(4) requires an off-site facility to inspect, and if necessary, analyze each waste received at the facility to determine whether it matches the identity of the waste specified on the manifest. FMPC's current WAP does not specify

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inspection and analytical procedures that will be used to verify the contents of the containers received from RMI.

c. The WAP sates that most wastes generated at FMPC are mixed wastes but does not specify what procedures and criteria are used to make the determination of whether a waste is a mixed waste. Specify the criteria for determining whether a waste is a mixed waste. If the waste is a mixed waste, specify criteria for determining whether it is a "high level waste" (HLW), "low level waste" (LLW), or is at a "below regulatory concern" (BRC) level. Then specify storage and disposal procedures for each of these categories.

d. Table C-1 refers to excess lab chemicals and unused products as wastes generated at FMPC. Identify these excess chemicals and products by common name and EPA waste code number.

e. Table C-1 lists unused caustic soda with an EPA I.D. number of D001. Is this accurate?

f. Section C-2K-10 of the WAP is not detailed enough to ensure compliance with the Land Disposal Restriction (LDR) Regulations (40 CFR 268). Specify which of the F-solvents generated at FMPC will be analyzed using TCLP to demonstrate that the waste meets the treatment standards. Also explain how FMPC will verify whether F-solvent wastes imported from RMI meet treatment standards. FMPC generates a potential California List Waste (chromic acid). Describe the criteria that will be used to determine whether this waste is land restricted. Also keep in mind that some of the excess lab chemicals and unused products may be First or Second Third wastes. Provide discussion which describes procedures for identification and handling of these wastes.

Please revise the WAP accordingly and submit the revised plan to me no later than October 17, 1989.

6. The issue over whether FMPC should be conducting inspections at inactive hazardous waste management units pending closure was raised. Inspections should be conducted per FMPC's current inspection schedule until the

closure process has been initiated for these units. The closure process is initiated upon agency approval of a closure plan for each particular unit.

FMPC may propose a less comprehensive inspection for these inactive units. If FMPC chooses to take this course of action, submit a revised inspection plan and schedule which reflects these proposals. Please provide documentation which shows that FMPC is conducting inspections of the inactive sites. Submit these documents for my review no later than October 3, 1989.

7. The personnel training requirements were evaluated by Mr. Lin of PRC. To the best of my knowledge, he found the newly implemented training program to be adequate at this time.

8. An evaluation of the FMPC Contingency Plan will be conducted upon receipt of the new plan, expected by September 1, 1989.

9. During the inspection I requested that FMPC conduct an evaluation of all active satellite accumulation areas to ensure that these areas are being operated in accordance with OAC 3745-52-34. No specific violations of this rule were cited at the time of the inspection, but the need for such an evaluation was discussed and agreed upon by all concerned parties. Please submit the results of this evaluation upon its completion.

10. FMPC has proposed the use of the Plant 8 warehouse for storage of hazardous waste. Given the current status of FMPC's permit in the State of Ohio, I could not answer some of the questions raised to me during the inspection as to what procedures FMPC should follow in order to gain the State's approval to begin using this storage area. I have since discussed this issue with Ed Lim of our Columbus office and Jack Van Kley of the Ohio Attorney General's office. We concluded that FMPC should refer to Section 3.2 of the Consent Decree to determine the correct procedures. Simply put, the Consent Decree states that FMPC must not store waste in any unit not included in a current or subsequent permit application. Therefore, FMPC must submit a revised Part A to Ohio which indicates the intention for storing hazardous waste in the Plant 8 warehouse. The submittal of the revised Part A must be completed prior to the initiation of storage in this new unit.

Once FMPC begins using this unit for storage activities, such storage must be conducted in compliance with all applicable regulations. Upon my receipt of a revised Part A, I will set up an inspection of the Plant 8 warehouse to determine compliance.

11. Waste characterization and clean level issues were raised regarding the gritblast cleanup project. Conversations with DOE and WMCO personnel since the inspection have led to my request for written proposals from FMPC regarding these issues. Upon receipt of these proposals, I will comment on their adequacy.

12. Another topic of discussion during the inspection was the temporary storage of containers while the bay floors at the KC-2 warehouse are repaired and upgraded. There have been subsequent phone conversations between FMPC personnel and myself on this issue as well. Again it was mutually agreed that FMPC would make a written proposal for temporary storage procedures, and that I would review and comment on the proposal.

13. The Land Disposal Restriction (LDR) regulations are currently enforced by the U.S. EPA. Any deficiencies/violations of the LDR rules will be noted by PRC on the LDR Inspection form and will subsequently be addressed by U.S. EPA Region V.

14. Financial requirements and groundwater monitoring requirements were not addressed as part of my inspection.

Please call me at (513) 449-6357 if you have any questions or comments.

Sincerely,

Paul D. Pardi

Paul D. Pardi
Solid & Hazardous Waste Management Unit

PDP/dkc

cc: Mr. Bruce Boswell, President WMCO
Ms. Catherine McCord, U.S. EPA, Region V
Mr. Rob Foster, PRC
Teri Martin, DSHWM, CO

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Environmental Protection Agency

RCRA INTERIM STATUS INSPECTION FORM

Facility Name: DOE-FMPC
Address: 7400 Willey Road
Fernald, OH
County: HAMILTON
Facility Contact: JACK CRAIG
SUE SCHNEIDER
Inspector(s)Name(s): PAUL BARDI
ROBERT FOSTER
EDDY LIN

Date of Inspection 8/2/89 and 8/3/89
HWFB #:
USEPA ID #: OH6390008976
Facility Phone #:
Facility Contact Phone#: 738-6159
Safety Equipment #:

STATUS
Cond. Ex. SQG___ SQG___ Generator ✓ Transporter___ Treatment___ Storage ✓ Disposal___
ACTIVITIES
Containers ✓ Tanks* ___ Surface Impoundments* ___ Incineration/Thermal treatment* ___
Waste pile___ Land treatment___ Landfill___ Groundwater monitoring___
Used oil burner___ Hazardous waste fuel burner/blender___

	Y/N/NA	REMARK #
1. Does the facility produce "discarded materials" as defined in 3745-51-02(A)?	Y	
2. Are they :		
a. Abandoned(disposed;incinerated;accumulated, stored, or treated prior to disposal)?		
b. Recycled?		
c. Inherently waste-like?(F020,F021,F022,F023,F026,F028)?		
3. If recycled or accumulated, treated or stored before recycling, is the waste:		
a. Used in a manner constituting disposal?		
b. Burned for energy recovery?		
c. Reclaimed? (Refer to Table 1 of 3745-51-02)		
d. Accumulated speculatively?		
4. Is the material recycled by being:		
a. Used or reused as an ingredient in an industrial process to make a product without prior reclamation?		
b. Used as an effective substitute for commercial products?		
c. Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock?		

*Inactive units - closure plans submitted for impoundments and Incinerator
- closure plan pending for tanks.

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	Y/N/NA	REMARK #
5. Are LDR wastes generated? If so, complete appropriate LDR checklist.	Y	
6. Has the facility submitted a Part A to Ohio?	Y	
7. If yes, is it complete and accurate?		New Part A in the works.
8. If not accurate, has a PCR been submitted? If yes, what date was the PCR submitted?		
9. Is the facility operating in compliance with the terms and conditions of its HWFB permit?	NA	
10. Has the facility submitted a Part B?	Y	
11. Was advance notice of the inspection given? If so, how far in advance?	N	

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REMARKS. GENERAL INFORMATION.

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

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QAC 3745-52 GENERATOR REQUIREMENTS (40 CFR Part 262)	Y/N/NA	REMARK #
1. Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?	N	#1
2. Does this facility generate any hazardous wastes that are excluded from regulation under 3745-51-04 (261.4)?	Y	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment [3745-65-01] (265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit [3745-65-01] (265.1(c)(10))?	N	
4. Is the generator classified as a Small Quantity Generator (SQG) or conditionally exempt SQG? If so, complete appropriate checklist.	N	
5. 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 using the most recently revised USEPA form 8700-22?	Y	
b. The manifest form used contains all the information required by 3745-52-20 (262.20) and the minimum number of copies required by 3745-52-22 (262.22)?	Y	
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) (262.20)?	Y	
d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23(A)(1&2) (262.23)?	Y	
e. The generator has complied with manifest exception reporting requirements in 3745-52-42 (262.42(a))?	NA	
f. Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by 3745-52-40 (262.40)?	Y	

Not all wastes generated have been analyzed and/or characterized at this time.

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	Y/N/NA	REMARK #
6. Does the generator meet the following hazardous waste pre-transport requirements:		
a. Prior to offering hazardous wastes for transport off-site, the waste material is packaged, labeled, and marked in accordance with applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32] (262.30, 262.31, 262.32)?	Y	
b. Prior to offering hazardous waste for transport off-site, each container with a capacity of 110 gallons <u>or less</u> is affixed with a completed hazardous waste label as required by 3745-52-32 (262.32)?	Y	
c. Prior to offering hazardous wastes for transport off-site, the generator meets requirements for properly placarding or offering to properly placard for the initial transporter of the waste material in compliance with 3745-52-33 (262.33)?	Y	
7. Does the generator import or export hazardous waste?	N	
If so, are the wastes handled in accordance with the requirements of 3745-52-50 (262.50)?	NA	
8. If the generator elects to accumulate hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days or less</u> without a hazardous waste facility installation and operation permit as provided under 3745-52-34 (262.34), are the following requirements with respect to such accumulation met:		
a. The containers or tanks are clearly marked with the words "Hazardous Waste"?	Y	
b. The date that accumulation began is clearly marked on each container?	Y	
c. If the waste is accumulated in containers, the generator is complying with OAC 3745-66-71 to 3745-66-74 and 3745-66-76 to 3745-66-77? Complete <u>Management of Containers</u> checklist.	See checklist	

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	Y/N/NA	REMARK #
d. If the waste is accumulated in tanks, the generator is complying with OAC 3745-66-90, 3745-66-91, 3745-66-92, 3745-66-94, and 3745-66-97 to 3745-66-99 except OAC 3745-66-97(C)? Complete Storage and Treatment in Tanks checklist.	NA	
e. If the generator accumulates waste at or near the point of generation which is under the control of the operator of the process generating the waste as allowed by 3745-52-34(C) are the following requirements met:		
1. Quantities of waste accumulated do not exceed 55 gallons at any time?	Y	
2. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?	Y	
3. If the generator is accumulating hazardous waste in accordance with e.1 or e.2, above, has the generator marked the containers with words "Hazardous Waste" or with other words identify the contents of the container and is the generator complying with OAC 3745-55-71, 3745-55-72, 3745-55-73(A), 3745-55-76, and 3745-55-77?	Y	
4. If the generator accumulates hazardous wastes in excess of the amounts listed in either e.1 or e.2, above, did the generator comply with 3745-52-34(A) (262.34(a)) within three (3) days and mark the container holding the excess accumulation with the date the excess accumulation began accumulating?	Y	
9. Has the genertor accumulated hazardous wastes in excess of ninety (90) days?	Y-Permitted to do so.	
10. Has the generator been granted an extension by the Director/ Regional Administrator for accumulation in excess of ninety (90) days?	N	
11. Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a USEPA identification number from the Administrator as required under 3745-52-12 (262.12)?	N	

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	Y/N/NA	REMARK #
12. Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) (265.16) including instruction in safe equipment operation and emergency procedures, training new employees within 6 months and providing an annual training program refresher course? [3745-52-34(A)(4)] (262.34)	Y	
13. Does the generator keep all of the records required by 3745-65-16(D)(E) (265.16) including written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)] (262.34)	Y	
14. Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41?	Y	
15. Does the generator comply with the applicable requirements for owners or operators of hazardous waste facilities? Complete "Preparedness and Prevention" and "Contingency Plan and Emergency Procedures" checklists.	See checklists	

REMARKS, GENERATOR REQUIREMENTS

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OAC 3745-66 USE AND MANAGEMENT OF CONTAINERS (40 CFR PART 265, SUBPART I)

		Y/N/NA	REMARK #
1.	Are hazardous wastes stored in containers which are:		
	a. Closed [3745-66-73(A)] (265.173)?	Y	#1
	b. In good condition [3745-66-71] (265.171)?	Y	#2
	c. Compatible with the wastes stored in them [3745-66-72] (265.172)?	Y	
2.	Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] (265.173(a))	Y	See #1.
3.	Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] (265.173(b))	Y	
4.	Is the area where containers stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] (265.174) [documentation of inspections required under 3745-65-15 for TSDs]	Y	
5.	Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] (265.176)	Y	
6.	Are containers holding hazardous wastes stored separate from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] (265.177(c))	Y	

#1. Yes, with the exception of 1 drum in a satellite accumulation area, Plant 6.
#2. Yes, except for 1 dented drum in KC-2 warehouse

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OAC 3745-66 CLOSURE AND POST-CLOSURE (40 CFR PART 265, SUBPART G)

	Y/N/NA	REMARK #
1. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] (265.112)?		
a. A description of how each hazardous waste management unit will be closed in accordance with 265.11.	N	#1
b. A description of how final closure will meet the requirements of 3745-66-11 (265.111).		#2
c. An estimate of the maximum amount of hazardous waste in inventory.		
d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues.		
e. The year closure is expected to begin and a schedule for the various phases of closure.		
f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control.		
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 effects the closure plan? [3745-66-12(C)] (265.112(c))	N	#3
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/Regional Administrator 180 days prior to beginning the closure process or 45 days if only have tanks, container storage or incinerator? [3745-66-12(D)] (265.112(d))		# 4 (Page 30)
4. Has the closure plan (and post-closure plan, if applicable) for tank, containers storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to beginning the closure process? [3745-66-12(D) (265.112(d))		"

#1. Current Closure Plan does not address Bldg 79.
#2. Closure plan will be evaluated upon receipt of revised plan.
#3 Was not revised to include Bldg 79.

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		Y/N/NA	REMARK #
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)] (265.113(a))		#4 (Page 30)
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)] (265.113(b))		"
7.	Did the onwer/operator submit to the Director/Regional Administrator, 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] (265.115)		"
8.	What permitted units at the facility have been closed in accordance with an approved Closure Plan?		"
9.	If closure was partial, list the regulated units which remain in use at the faciilty: _____ _____		
10.	If required, has the facility prepared a written post-closure plan? [3745-66-18] (265.118)		"
11.	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] (265.119)		"

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	Y/N/NA	REMARK #
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?		#4
b. Land use is restricted pursuant to 3745-66-17? [3745-66-10] (265.119)		"

#4. EMPC has (and will) filed closure and post-closure plans as part of process to close out several inactive units at the site. These plans are in various stages of the review process and are not addressed as part of this inspection.

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS (40 CFR Part 265, SUBPART B)

	Y/N/NA	REMARK #
1. 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 or store the waste as required by 3745-65-13(A)(1) (265.13(a))?	N	#1
2. Does o/o have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. [3745-65-13(B)] (265.13(b))	N	#2
3. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1))	Y	
b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2))	Y	
IF BOTH 3A and 3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.		
4. Does the facility have - a. A 24-hour surveillance system, or b. An artificial or natural barrier <u>and</u> a means to control entry at all times [3745-65-14(B)(2)(a and b)] (265.14(b)(2))	Y	
5. 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)](265.14(c))	Y	
6. a. Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. [3745-65-15] (265.15)	Y	#3

#1. Not all wastes have been analyzed to date.

#2. WAP deficient in many areas — see attached inspection report letter.

#3 Inactive units have not been inspected - these units are addressed in inspection plan.

OAC 3745-65 MANIFEST SYSTEM/RECORDS/REPORTING (40 CFR PART 265, SUBPART E)

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

		Y/N/NA	REMARK #
1.	Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) (265.73) which contains the following information:		
a.	Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)] (265.73(b)(1).	Y	
b.	Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?	N	#1
c.	The estimated (or actual) weight, volume or density of the waste material?	Y	
d.	A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745? (Part 265, Appendix I, Table 2)	Y	
e.	The present physical location of each hazardous waste within the facility?	Y	
f.	Records of incidents which require implementation of the Contingency Plan?	Y	
g.	FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document numbers? [3745-65-73(B)(2)] (265.73(b)(2))	NA	
h.	Records of any waste analyses and trial tests required to be performed?	Y	
i.	Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)?	Y	
j.	Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6);(265.73(b)(6))?	Y	

#1. This information is not recorded for those wastes that have yet to be analyzed.

	Y/N/NA	REMARK #
k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required under OAC 3745-66 (Part 265 Subpart G)?	Y	
2. Has the o/o submitted an annual (bienniel) Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under 3745-65-75 (265.75)?	Y	

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.

3. Are manifests received by the facility signed and dated?	Y	
Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)] (265.71)	Y	
a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)] (265.71(b))?	NA	
b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) (265.72(a)) noted in writing on the manifest document.	NA	
4. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) (265.72(b)) or has the o/o submitted the required information to the Director/Regional Administrator?	NA	
5. If the facility 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 3745-65-76(A) (265.76) been submitted to the Director/Regional Administrator within 15 days?	NA	

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OAC 3745-65 PREPAREDNESS AND PREVENTION (40 CFR PART 265 SUBPART C)

		Y/N/NA	REMARK #
1.	Is the facility operated to minimize the possibilty of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] (265.31)	Y	
2.	Has there been a fire, explosion or non-planned release of waste at the facility?	N	
3.	If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)] (265.32)		
	a. Internal alarm system?	Y	
	b. Access to telephone, radio or other device for summoning emergency assistance?	Y	
	c. Portable fire control equipment?	Y	
	d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	Y	
4.	Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary? [3745-65-33] (265.33)	Y	
5.	If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34)	Y	
6.	If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] (265.35)	Y	
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 the possible hazards and the facility layout? [3745-65-37(A)] (265.37(a))	Y	

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	Y/N/NA	REMARK #
8. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3745-65-37(B)] (265.37(b))	NA	

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OAC 3745-65 CONTINGENCY PLAN AND EMERGENCY PROCEDURES (40 CFR PART 265 SUBPART D)

		Y/N/NA	REMARK #
1.	Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? [3745-65-52(A)(B)(C)(D)(E)] (265.52):		
a.	Actions to be taken by personnel in the event of an emergency incident?		#1
b.	Arrangements or agreements with local or state emergency authorities?		"
c.	Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?		"
d.	A list of all emergency equipment including location, physical description and outline of capabilities?		"
e.	If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)] (265.52(f))?		"
2.	Is a copy of the Contingency Plan and any plan revisions maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] (265.53)	Y	
3.	Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] (265.54)	Y	
4.	Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] (265.56)	Y	
5.	If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications deemed necessary under 3745-65-56(A-J). (265.56(a-j))	NA	

#1. Contingency Plan review will take ~~of~~ place upon receipt of revised plan - expected 9/1/89.

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