



State of Ohio Environmental Protection Agency

Southwest District Office

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6-604.3

FERNALD

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LOG K-1771

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George V. Voinovich
Governor

June 10, 1997

RE: DOE-FEMP
HAZARDOUS WASTE
OH6 890 008 976
HAMILTON COUNTY
TSDF/LQG

Mr. Jack Craig, Director
Department of Energy
Fernald Environmental Management Project
P.O. Box 538705
Cincinnati, Ohio 45239-8705

Dear Mr. Craig:

On April 30, 1997, Mr. Chris Budich, and I visited the U.S. Department of Energy Fernald Environmental Management Project (DOE-FEMP) facility in order to conduct a Hazardous Waste Compliance Evaluation Inspection. We were accompanied by Ms. Kristen Cadwell of the Ohio EPA Office of Federal Facility Oversight. The purpose of the inspection was to assess DOE-FEMP's level of compliance with regard to State of Ohio and federal regulations governing the management of hazardous waste. A copy of checklists used to complete the inspection are enclosed. I apologize for the delay in your receipt of this correspondence. The results of the inspection are as follows:

No violations were documented as a result of the inspection.

Failure to list a deficiency in this correspondence does not relieve DOE-FEMP from the responsibility of complying with all applicable hazardous waste regulations.

Should you have questions concerning this inspection, please do not hesitate to contact either myself at (513) 285-6090, or Chris Budich at (513) 285-6083.

Sincerely,

Phillip C. Harris
Division of Hazardous Waste Management

Enclosure

cc: Linda Neumann, RCRA Enforcement, CO
Terry Hagen, FERMCO

**RCRA HAZARDOUS WASTE FACILITY
COMPLIANCE EVALUATION INSPECTION CHECKLIST**

Facility: U.S. DOE-FEMP (FERNALD)

USEPA I.D.: OH6 890008976 HWFB No.: _____

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

City: FERNALD State: OH Zip: 45030

County: HAMILTON Telephone: (513) 648-3101

Fax No: _____ PUCO No.: _____

Owner/Operator: O/O U.S. DOE / CO-OP FLUOR DANIEL

Street: _____

City: _____ State: _____ Zip: _____

Telephone: _____ Fax: _____

Inspection Date: 4/30/97 Time: 10:05 - 15:10

Advance notice of inspection given? (yes) _____ (no) X
If so, how far in advance? _____

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspectors:	<u>PHIL HARRIS, DEPA SWDO/ES II</u>		<u>(937) 285-6090</u>
	<u>CHRIS BUDICH, DEPA SWDO/ES III</u>		<u>(937) 285-6083</u>
Facility Representative:	<u>ROBT DANNER, DOE</u>		
	<u>JERRY LESTER, FERMCO</u>		

STATUS

Cond. Rx. SQG _____ SQG _____ Large Quantity Generator
Treatment _____ Storage Disposal _____ Transporter _____

Part A Permit: (yes) (no) _____ Part B Permit: (yes) _____ (no)
LDR Checklist Attached: (yes) (no) _____

ACTIVITIES

Containers <input checked="" type="checkbox"/>	Used oil burner _____
Tanks _____	Hazardous waste fuel burner/blender _____
Wastepile _____	Incineration/Thermal treatment _____
Landfill _____	Land treatment _____
Surface Impoundment _____	Groundwater monitoring <input checked="" type="checkbox"/>

REMARKS - GENERAL INFORMATION

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

FACILITY IS FORMER DOE URANIUM PROCESSING PLANT, NOW UNDER CERCLA REMEDIATION.

DOE-GENERATED MIXED WASTES STORED ON-SITE (CONTAINER STORAGE). TREATMENT & DISPOSAL OF "LEGACY" WASTES SCHEDULED UNDER CERCLA & FFCA-STP PROVISIONS.

STATE-FACILITY AGREEMENT (RCRA/CERCLA INTEGRATION) RESULTED IN DEFO'S ADDRESSING MANAGEMENT OF MIXED WASTES UNDER CONDITIONS AS DESCRIBED IN FACILITY PART B APPLICATION.

MUCH OF FACILITY'S "LEGACY" MIXED WASTE HAS BEEN SHIPPED OFFSITE FOR TREATMENT/DISPOSAL.

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)?

Y _____

4. Is the waste analysis repeated when a process or operation generating hazardous waste changes? [3745-65-13 (A) (3) (a)]

CHARACTERIZATION
NA FOR DISPOSAL

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)]

NA _____

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)]

Y _____

- 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)]

Y _____

- e. FOR OFF-SITE FACILITIES: The waste analysis that hazardous waste generators have agreed to supply? [3745-65-13 (B) (5)]

NA _____

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

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)]

Vertical line with horizontal tick marks at each question level, ending in a downward arrow.

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)]

WASTE ANALYSIS PLAN - IDR 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

Vertical line with horizontal tick marks at each question level, ending in a downward arrow.

7

2. Does the operating record include documentation required to be maintained under the land disposal restriction requirements of Chapter 3745-59? [3745-65-73(b)(9) through (14)]

Y _____

NOTE: The following recordkeeping requirements are applicable only to off-site TSDS.

3. Are manifests received by the facility signed and dated? [3745-65-71(A)(1)]

NA _____

4. 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)]

a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)]?

b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) noted in writing on the manifest document?

5. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) or has the o/o submitted the required information to the Director?

6. 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) been submitted to the Director within 15 days?

_____ ✓

REMARKS - OPERATING RECORD REQUIREMENTS

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

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 _____
J _____

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 _____
J _____
Y _____

REMARKS - SECURITY REQUIREMENTS

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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? | Y | |
| 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)? | Y | |
| 3. Does the facility provide an annual training program refresher course as required by 3745-65-16(B)? | Y | |
| 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

CONTINGENCY PLAN (OAC 3745-65-50 THROUGH 3745-65-56)

Y/N/NA RMK #

- | | | |
|---|--|--|
| <p>1. Does the o/o have a written contingency plan which contains the following [3745-65-52 (A) (B) (C) (D) (E)]:</p> <p>a. Actions to be taken by personnel in the event of an emergency?</p> <p>b. Arrangements or agreements with local or state emergency authorities?</p> <p>c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?</p> <p>d. A list of all emergency equipment including location, physical description and outline of capabilities?</p> <p>e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52 (F)]?</p> | <p>Y</p> <hr/> <p>Y</p> <hr/> <p>Y</p> <hr/> <p>Y</p> <hr/> <p>Y</p> <hr/> | <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> |
| <p>2. Is the contingency plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51 (A)]</p> | <p>Y</p> <hr/> | <p>_____</p> |
| <p>3. Is a copy of the contingency plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in execution of the plan? [3745-65-53 (A) (B)]</p> | <p>Y</p> <hr/> | <p>_____</p> |
| <p>4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54]</p> | <p>Y</p> <hr/> | <p>_____</p> |
| <p>5. 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)? [3745-65-55]</p> | <p>Y</p> <hr/> | <p>_____</p> |
| <p>6. 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 necessary under 3745-65-56 (A-J)?</p> | <p>NA</p> <hr/> | <p>_____</p> |

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? N
 - a. If yes, was the contingency plan implemented? [3745-65-51(B)] NA
- 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)]
 - 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)] Y
 - 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? NR
- 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] Y
- 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] 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 possible hazards and facility layout? [3745-65-37(A)] Y

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

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] ↓ _____
 - 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)] 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? | _____
 - 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] Y _____

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	
	V	

REMARKS - IGNITABLE/REACTIVE/INCOMPATIBLE WASTE REQUIREMENTS

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- 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?

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

- 11. If required, has the facility prepared a written post-closure plan? [3745-66-18] NA
 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? _____
 - b. Land use is restricted under closure and post-closure rules? [3745-66-19] _____

REMARKS - CLOSURE/POST CLOSURE REQUIREMENTS

1. FINAL CLOSURE OF FACILITY SUBJECT TO CERCLA PROCESS.
 STATE - FACILITY AGREEMENT FOR CLOSURE OF SELECTED RCRA UNITS WITHIN CERCLA DOCUMENTED ACTIVITIES.

LARGE QUANTITY GENERATOR REQUIREMENTS**GENERAL REQUIREMENTS**

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No N/A RMK#
2. Has the generator obtained an identification number? [3745-52-12] Yes No N/A RMK#
3. Were annual reports filed with OEPA on or before March 1st? [3745-52-41] Yes No N/A RMK#

WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? *If so,* Yes No N/A RMK#
- (a) Generator notified US EPA of export/import activity [3745-52-53] Yes No N/A RMK#
- (b) Generator complied with special manifest requirements [3745-52-54] Yes No N/A RMK#
- (c) For manifests that have not been returned to generator: An exception report has been filed [3745-52-55] Yes No N/A RMK#
- (d) Annual report submitted to US EPA [3745-52-56] Yes No N/A RMK#
- (e) Export related documents being maintained on-site [3745-52-57] Yes No N/A RMK#

GENERATOR CLOSURE REQUIREMENTS

5. Has the generator closed any < 90-day accumulation unit(s) since date of last inspection? Yes No N/A RMK#
- (a) *If so,* describe the unit(s) which the generator has closed:
- (b) Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] Yes No N/A RMK#

NOTE: *If the generator has closed a < 90 day tank, closure must be completed also in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]*

- (c) Please provide a description of the documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standard:

MANIFEST REQUIREMENTS

1. All hazardous wastes shipped off-site have been accompanied by a manifest (US EPA form 8700-22) [3745-52-20(A)]

Yes No N/A ___ RMK# ___

(a) Item I and items (1) through (20) of each manifest have been completed [3745-52-20(B)]

Yes No N/A ___ RMK# ___

NOTE: US EPA form 8700-22(A) (the continuation form) may be needed in addition to form 8700-22. In these situations, item R and items (21) through (35) must also be completed. [3745-52-20(B)]

2. Manifest designates at least one permitted disposal facility [3745-52-20(C)]

Yes No N/A ___ RMK# ___

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

3. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility?

Yes ___ No N/A ___ RMK# ___

(a) *If so*, did the generator designate an alternative TSD facility or give the transporter instructions to return the waste? [3745-52-20(E)]

Yes ___ No N/A ___ RMK# ___

4. Manifests have been signed by the generator and initial transporter [3745-52-23(A)(1)(2)]

Yes No N/A ___ RMK# ___

5. Has the generator received a return copy of each completed manifest within (35) days of being accepted by the transporter? If not,

Yes No ___ N/A ___ RMK# ___

(a) Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)]

Yes ___ No N/A ___ RMK# ___

(b) If the manifest was not received within (45) days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]

Yes ___ No N/A ___ RMK# ___

6. Signed copies of all manifests and any exception reports are being retained for at least 3 years [3745-52-40]

Yes No N/A ___ RMK# ___

REMARKS

LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-59-07(A)] Yes No N/A ___ RMK# ___

(a) For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-59-07(A)(5)] Yes No N/A ___ RMK# ___

(b) For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-59-07(A)(5)] Yes No N/A ___ RMK# ___

2. Does the generator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-59-03] Yes No N/A ___ RMK# ___

3. Has the generator determined each Ohio EPA hazardous waste code applicable to the waste? [3745-59-09(A)] Yes No N/A ___ RMK# ___

4. Has the generator determined the correct "treatability group(s)" (e.g. wastewater, non-wastewater, etc.)? [3745-59-07(A)] Yes No N/A ___ RMK# ___

5. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [3745-59-07(A)] Yes No N/A ___ RMK# ___

6. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-59-09] Yes No ___ N/A ___ RMK# ___

(a) If so, has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-59-09(A)] Yes No N/A ___ RMK# ___

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

7. Does the generator have LDR notification (and certification, where applicable) forms for each shipment of waste? [3745-59-07(A)(1) and (A)(2)] Yes No N/A ___ RMK# ___

8. Does each notification/certification form completed contain the following information: [3745-59-07(A)(1) and (A)(2)]

(a) EPA hazardous waste codes for each waste? Yes No N/A ___ RMK# ___

(b) Appropriate treatment standards for each waste? Yes No N/A ___ RMK# ___

(c) The manifest number? Yes No N/A ___ RMK# ___

(d) Waste analysis data, where available? Yes No N/A ___ RMK# ___

(e) Certification signed by the generator or an authorized representative? (for wastes meeting treatment standards only) Yes No N/A ___ RMK# ___

LDR REQUIREMENTS- cont.

9. Does the generator produce a waste that is hazardous at the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-59-07(A)(6)]

Yes ___ No N/A ___ RMK# ___

(a) *If so*, is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the waste? [3745-59-07(A)(6)]

Yes ___ No N/A ___ RMK# ___

NOTE: *Examples include hazardous wastes discharged to a POTW or to a surface water under an NPDES permit, and any characteristic hazardous waste that is rendered nonhazardous via mixing or treatment.*

10. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least five (5) years? [3745-59-07(A)(7)]

Yes No N/A ___ RMK# ___

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

Yes ___ No N/A ___ RMK# ___

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

Yes ___ No N/A ___ RMK# ___

i. Does the generator submit a notification and certification to the director which contains the following:

a. Name and address of the facility receiving the waste? [3745-59-09(D)(1)(a)]

Yes ___ No N/A ___ RMK# ___

b. A description of the waste, including EPA hazardous waste numbers and treatability group? [3745-59-09(D)(1)(b)]

Yes ___ No N/A ___ RMK# ___

c. The treatment standards applicable to the waste at the initial point of generation? [3745-59-09(D)(1)(c)]

Yes ___ No N/A ___ RMK# ___

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)? [3745-59-09(D)(2)]

Yes ___ No N/A ___ RMK# ___

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.*

REMARKS

1. The generator keeps records required by 3745-65-16(D) including:

- (a) Job titles, as they relate to hazardous waste management, and the name of each employee filling each job
Yes ___ No N/A ___ RMK# ___
- (b) Job description, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position
Yes ___ No N/A ___ RMK# ___
- (c) Type and amount of both introductory and continuing training to be given to each person filling a position
Yes ___ No N/A ___ RMK# ___
- (d) Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B)&(C)
Yes ___ No N/A ___ RMK# ___

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

2. Generator has a training program which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to their positions [3745-65-16(A)(2)]

Yes ___ No N/A ___ RMK# ___

3. In accordance with 3745-65-16(A)(3), the personnel training program includes instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with:

- (a) Emergency procedures
Yes ___ No N/A ___ RMK# ___
- (b) Emergency equipment
Yes ___ No N/A ___ RMK# ___
- (c) Emergency systems
Yes ___ No N/A ___ RMK# ___

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

- (a) Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment
Yes ___ No N/A ___ RMK# ___
- (b) Key parameters for automatic waste feed cut-off systems
Yes ___ No N/A ___ RMK# ___
- (c) Communication or alarm systems
Yes ___ No N/A ___ RMK# ___
- (d) Response procedures for fire/explosions
Yes ___ No N/A ___ RMK# ___
- (e) Response to ground water contamination incidents
Yes ___ No N/A ___ RMK# ___
- (f) Shutdown procedures
Yes ___ No N/A ___ RMK# ___

5. Personnel training program is directed by a person trained in hazardous waste management procedures as required by 3745-65-16(A)(2)

Yes ___ No N/A ___ RMK# ___

PERSONNEL TRAINING - cont.

6. New employees receive training within 6 months after the date of hire (or assignment to a new position) as required by 3745-65-16(B) Yes ___ No N/A ___ RMK# ___
7. Annual refresher training is provided to employees as required by 3745-65-16(C) Yes ___ No N/A ___ RMK# ___
8. Training records for current personnel are kept until closure of the facility; training records for former employees are kept for at least three years from the date the employee last worked at the facility [3745-65-16(E)] Yes ___ No N/A ___ RMK# ___
9. **Optional** The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators; drum handlers; emergency coordinators; personnel who conduct hazardous waste inspections; emergency response teams; personnel who prepare manifests, etc.

Job performed

Name of employee

Date(s) Trained

REMARKS

CONTINGENCY PLAN [3745-52-34(A)(4)] → SEE TSDf CHECKLIST

- 1. The facility has a contingency plan which describes the following: [3745-65-52(A) through (F)]
 - (a) Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste Yes___ No N/A___ RMK#___
 - (b) Arrangements/agreements with emergency authorities [3745-65-37] Yes___ No N/A___ RMK#___
 - (c) A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator Yes___ No N/A___ RMK#___
 - (d) A list of all emergency equipment, including: location, physical description and brief outline of capabilities Yes___ No N/A___ RMK#___
 - (e) An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary Yes___ No N/A___ RMK#___

NOTE: *If the facility already has a "Spill Prevention, Control and Counter-measures 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 the OAC requirements. [3745-65-52(B)]*

- 2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes___ No N/A___ RMK#___
- 3. A copy of the plan (plus revisions) is kept on-site and has been given to all emergency authorities that might be required to participate in execution of the plan [3745-65-53(A)(B)] Yes___ No N/A___ RMK#___
- 4. The plan is revised in response to rule changes, facility, equipment and personnel changes, failure of the plan or as required by the director [3745-65-54] Yes___ No N/A___ RMK#___

EMERGENCY COORDINATOR

- 5. An emergency coordinator is available at all times (on-site or on-call) [3745-65-55] Yes___ No N/A___ RMK#___

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

CONTINGENCY PLAN - cont.

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? *If so,* Yes___ No___ N/A___ RMK#___
- (a) Was the contingency plan implemented? [3745-65-51(B)] Yes___ No N/A___ RMK#___
- (b) Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes___ No N/A___ RMK#___
- (c) Did the facility submit a report to the director within (15) days of the incident as required by 3745-65-56(J)? Yes___ No N/A___ RMK#___

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

REMARKS

PREPAREDNESS AND PREVENTION [3745-52-34(A)(4)] → SEE TSDF CHECKLIST

1. Facility operated to minimize the possibility of fire, explosion, or unplanned release of hazardous waste [3745-65-31] Yes___ No N/A___ RMK#___

2. If required due to actual hazards associated with the waste, the facility has the following equipment: [3745-65-32(A)(B)(C)(D)]
 - (a) Internal alarm system Yes___ No N/A___ RMK#___
 - (b) Emergency communication device Yes___ No N/A___ RMK#___
 - (c) Portable fire control, spill control and decon equipment Yes___ No N/A___ RMK#___
 - (d) Water of adequate volume/pressure Yes___ No N/A___ RMK#___

3. Emergency equipment tested (inspected) on a weekly basis and maintained as necessary [3745-65-33] Yes___ No N/A___ RMK#___

4. Emergency equipment tests (inspections) are recorded in a log that includes the following information [3745-65-33(B)]
 - (a) Date and time of test Yes___ No N/A___ RMK#___
 - (b) Name of person conducting the test Yes___ No N/A___ RMK#___
 - (c) Observations made Yes___ No N/A___ RMK#___
 - (d) Date/nature of any repairs Yes___ No N/A___ RMK#___

5. Personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32*) [3745-65-34] Yes___ No N/A___ RMK#___

6. Adequate aisle space is provided for unobstructed movement of emergency or spill control equipment [3745-65-35] Yes___ No N/A___ RMK#___

7. Facility has attempted to familiarize emergency authorities with possible hazards and facility layout [3745-65-37(A)] Yes___ No N/A___ RMK#___
 - (a) Where authorities have declined to enter into arrangements/agreements, the refusal has been documented [3745-65-37(B)] Yes___ No N/A___ RMK#___

REMARKS

GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of (90) days without a permit or an extension from the director? [3745-52-34; ORC 3734.02(E)(F)]

Yes No N/A RMK#

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

2. Satellite accumulation areas are

(a) At or near a point of generation?

Yes No N/A RMK#

(b) Under the control of the operator of the process generating the waste?

Yes No N/A RMK#

(c) Total quantities of all waste streams do not exceed 55 gallons

Yes No N/A RMK#

(d) Quantities of acutely hazardous waste do not exceed 1 quart at any one time

Yes No N/A RMK#

(e) Containers are marked with words "Hazardous Waste" or other words identifying the contents

Yes No N/A RMK#

NOTE: *The 55 gallon limit applies to the area itself, and not to each individual waste stream accumulated in the area. The inspector should refer to the Ohio EPA November 1994 Guidance on the Location of Satellite Accumulation Areas.*

3. Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? *If so,*

Yes No N/A RMK#

(a) Did the generator comply with 3745-52-34(A) or other applicable generator requirements within (3) days? *and;*

Yes No N/A RMK#

(b) Did the generator mark the container(s) holding the excess with the accumulation date when the 55 gallon (1 quart) limit was exceeded?

Yes No N/A RMK#

USE AND MANAGEMENT OF CONTAINERS

4. Containers are marked with the words "Hazardous Waste" [3745-52-34(A)(3)]

Yes No N/A RMK#

5. Accumulation date is on each container [3745-52-34(A)(2)]

Yes No N/A RMK#

6. Are hazardous wastes stored in containers which are:

(a) Closed (except when adding/removing wastes) [3745-66-73(A)]

Yes No N/A RMK#

(b) In good condition [3745-66-71]

Yes No N/A RMK#

(c) Compatible with wastes stored in them [3745-66-72]

Yes No N/A RMK#

(d) Handled in a manner which prevents rupture/leakage [3745-66-73(B)]

Yes No N/A RMK#

7. Is the container accumulation area(s) inspected weekly [3745-66-74] (Note location in General Information section of checklist)

Yes No N/A RMK#

8. Are inspections described in Question #7 recorded in a log which contains the following information: [3745-66-74(B)]

- (a) Date and time of inspection
- (b) Name of inspector
- (c) Observations made during the inspection
- (d) Date/nature of any repairs or remedial action

Yes No N/A RMK#
 Yes No N/A RMK#
 Yes No N/A RMK#
 Yes No N/A RMK#

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

- (a) Containers are located at least 50 feet (15 meters) from the facility's property line [3745-66-76]
- (b) Containers are stored separately from other materials which may interact with the waste in a hazardous manner [3745-66-77(C)]

Yes No N/A RMK#
 Yes No N/A RMK#

PRE-TRANSPORT REQUIREMENTS

- 10. Waste is packaged/labeled in accordance with the applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32(A)]
- 11. Each container < 110 gallons has a completed hazardous waste label [3745-52-32(B)]
- 12. Before off-site transportation, generator placards or offers the appropriate DOT placards to the initial transporter [3745-52-33]

Yes No N/A RMK#
 Yes No N/A RMK#
 Yes No N/A RMK#

REMARKS

POLLUTION PREVENTION

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Note to the Inspector: This checklist has been developed to help the division in gathering general information about the pollution prevention practices initiated by companies across the state. Asking the company about each bullet point noted below the questions is not necessary. It is only necessary to ask the company the general questions about pollution prevention activities. If the company responds with one of the canned answers below, the appropriate box may be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided or in the remarks section.

1. Has the company undertaken any pollution prevention activities to reduce the amount of hazardous waste generated? Yes ___ No ___ N/A RMK# ___

(a) If so, what has the company done to minimize hazardous waste generation?

- A change in the process resulting in less waste
 A change in the product resulting in less waste
 Use of fewer and less toxic hazardous raw materials
 Better operations/improved housekeeping
 On-site recycling/reuse of hazardous materials
 Sending waste off-site for recycling/reuse
 Other activities (specify) _____

(b) If so, what hazardous wastes have been addressed?

- Solvents
 Paint related waste
 Industrial process wastes (sludges, slags, contaminated waste waters, etc.)
 Contaminated oils/hydraulic fluids
 Off-spec chemicals
 Fluorescent light bulbs
 Used batteries
 Shop rags
 Other (specify) _____

(c) If not, why hasn't the company considered pollution prevention?

- The company just never thought about it
 Lack of information about the alternatives that are practical for them
 Lack of capital to make process changes
 Lack of internal management support
 The company does not generate enough hazardous waste to consider pollution prevention
 Other reason given (specify) _____

2. Does the company plan to do pollution prevention activities in the future? Yes ___ No ___ N/A RMK# ___

3. Would the company be interested in receiving additional information from the Ohio EPA about pollution prevention? Yes ___ No ___ N/A RMK# ___

REMARKS