



State of Ohio Environmental Protection Agency

1558

Southwest District Office

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George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schragardus, Director

June 29, 1998

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

Mr. Johnny W. Reising, Project Manager
U.S. Department of Energy
Fernald Environmental Management Project
P.O. Box 538705
Cincinnati, Ohio 45253-8705

Dear Mr. Reising:

On June 16, 1998, representing the Ohio EPA, 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. I was accompanied on the inspection by Mr. Chris Cotton, and Mr. Jeff Smith of this office. 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. The following violation of Ohio Administrative Code (OAC) regulation was documented as a result of the inspection:

1. OAC 3745-66-15(D) General inspection requirements:

This rule stipulates record keeping and inspection log requirements for facility self-inspections. The rule requires, (in part) that inspection logs utilized by the facility must document the time of the inspection.

In reviewing facility inspection records, it was determined that the time block had been inadvertently dropped from all inspection logs when the forms were re-printed last year. DOE-FEMP is in violation of the above regulation.

Note: The facility has already submitted documentation to this office to correct this violation. The above violation has been corrected as evidenced by; 1) revised inspection forms which include a time block and. 2) examples of signed and dated logs. (representing facility inspections conducted subsequent to this Ohio EPA inspection) which document the time of the facility inspections. This documentation was received by this office June 17, 1998, and June 26, 1998.

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

Mr. Johnny W. Reising, U.S. DOE

June 29, 1998

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Should you have questions concerning this inspection, please do not hesitate to contact me at (937) 285-6090.

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 890 008 976 HWFB No.:
Street: 7400 WILLEY RD. MAILING: P.O. BOX 398705 CINCINNATI, OH. 452398705
City: CINCINNATI State: OH Zip: 45230
County: HAMILTON Telephone: 513-648-3101
Fax No.: PUCO No.:
Owner/Operator: U.S. DOE / CO-OP FLUOR DANIEL

Street:
City: State: Zip:
Telephone: Fax:

Inspection Date: 6/1/98 Time: 0950-1535

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

Inspectors: Name Agency/Title Phone
PHIL HARRIS, OEPA DHWM/ESTI 937-285-6090
JEFF SMITH, OEPA DHWM/ESTI
Facility Representative: JOHN SATTLER, DOE
TOM WALSH, FLUOR DANIEL

STATUS

Cond. Ex. SQG Treatment SQG Storage Large Quantity Generator Disposal Transporter
Part A Permit: (yes) (no) Part B Permit: (yes) (no)
LDR Checklist Attached: (yes) (no) N/A

ACTIVITIES

Containers Tanks Wastepile Landfill Surface Impoundment
Used oil burner Hazardous waste fuel burner/blender Incineration/Thermal treatment Land treatment Groundwater monitoring

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 TREATMENT,
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)]

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

NA _____

OPERATING RECORD REQUIREMENTS (OAC 3745-65-73)

Y/N/NA RMK #

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73 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)]

Y

b. As required by the Appendix to 3745-65-73, does the information specified in Question 1a include:

i. Common name, EPA hazardous waste identification number and physical state (solid, liquid, gas) of the waste?

ii. The estimated (or actual) weight, volume or density of the waste?

iii. 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 3745-65-73?

c. The present physical location of each hazardous waste within the facility and cross references to specific manifest document numbers?

d. Records of incidents which required implementation of the contingency plan?

e. Records of any waste analyses and trial tests required to be performed?

f. Records of the inspections required by the general inspection requirements under 3745-65-15?

g. Records of any monitoring, or analytical data required under other subparts as referenced by 3745-65-73(B)(6)?

✓

h. FOR DISPOSAL FACILITIES, location and quantity of each hazardous waste recorded on a facility map and cross-references to manifest document numbers? [3745-65-73(B)(2)]

NA

i. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required by OAC 3745-66?

✓

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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,
 - 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,
 - 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

1. TIME BLOCK INADVERTENTLY DROPPED WHEN NEW INSPECTION FORMS WERE PRINTED. INSPECTIONS HAVE NOT INCLUDED TIME. THIS VIOLATION HAS BEEN CORRECTED.

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

Y/N/NA RMK #

- 1. Does the o/o have a written contingency plan which contains the following [3745-65-52 (A) (B) (C) (D) (E)] :
 - a. Actions to be taken by personnel in the event of an emergency? Y
 - 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)]? V

- 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)] Y

- 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)] Y

- 4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] Y

- 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] Y

- 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)? NA

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? V
- 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

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? N ① SEE GENERAL INSPECTION REQUIREMENTS _____
 - b. Name of inspector? Y _____
 - 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 _____

LARGE QUANTITY GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

- 1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] *or scheduled to be evaluated.* 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 alternate 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

PERSONNEL TRAINING [3745-52-34(A)(4)]

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 used 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

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CONTINGENCY PLAN [3745-52-34(A)(4)]

- 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 Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with 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.

o. 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)]

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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#

SEE: GENERAL INSPECTION REQUIREMENTS

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

GEN IS STORAGE FACILITY / CERCLA

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
(b) Under the control of the operator of the process generating the waste
(c) Total quantities of all waste streams do not exceed 55 gallons
(d) Quantities of acutely hazardous waste do not exceed 1 quart at any one time
(e) Containers are marked with words "Hazardous Waste" or other words identifying the contents

Yes No N/A RMK#
Yes No N/A RMK#
Yes No N/A RMK#
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;
(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#
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)]
(b) In good condition [3745-66-71]
(c) Compatible with wastes stored in them [3745-66-72]
(d) Handled in a manner which prevents rupture/leakage [3745-66-73(B)]

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

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SEE: GENERAL INSPECTION REQUIREMENT

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# 1
 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

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