



4077

State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street  
Dayton, Ohio 45402-2911

TELE: (937) 285-6357 fax: (937) 285-6249

Bob Taft, Governor  
Maureen O'Connor, Lt. Governor  
Christopher Jones, Director

January 4, 2002

Mr. Stephen H. McCracken, Director  
U.S. Department of Energy  
Fernald Environmental Management Project  
P.O. Box 538705  
Cincinnati, Ohio 45253-8705

FILE  
2002 JAN -8 A 9 10  
FERNALD  
LOG C-0506

**SUBJECT: NOTICE OF COMPLIANCE**

Dear Mr. McCracken:

On December 12, 2001, 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 represented Ohio EPA for this inspection and I was accompanied by Mr. Walt Francis, US EPA, Region V. Several personnel represented the facility during the inspection; primarily Mr. Ed Skintek, DOE, and Mr. Tim Poff, Fluor Fernald. The purpose of the inspection was to assess DOE-FEMP's compliance with regard to State of Ohio and federal regulations governing the management of hazardous waste. Ohio EPA's inspection included a review of facility operations as well as an evaluation of the facility's required hazardous waste documentation. A copy of checklists used to complete the inspection are enclosed for your record.

The following two areas of inquiry were identified as requiring additional information in order to conclude the inspection:

1. Additional documentation regarding DOE-FEMP's annual refresher training for hazardous waste management personnel.
2. An explanation of circumstances regarding DOE-FEMP's receipt of approximately two tons of waste material containing asbestos from Tennessee in 1997.

Facility documentation addressing these issues was received December 31, 2001. The shipment in question was identified as waste materials originating from DOE-FEMP which were required to be returned to the site. DOE-FEMP had notified Ohio EPA of the necessity to receive this material, and the return shipment was approved by Ohio EPA. Therefore, these two issues were satisfactorily resolved through facility documentation.

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Mr. Stephen H. McCracken, U.S. DOE-FEMP  
January 4, 2002  
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The results of my inspection are as follows:

No violations were documented by the inspection. Facility representatives appear to be conducting operations in substantial compliance with hazardous waste regulations at this time.

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

Attachment

cc: Tammy McConnell, DHWM, CO

w/o Attachment

Walt Francis, US EPA, Region V  
Terry Hagen, Fluor Fernald, w/o Attachment  
Tim Poff, Fluor Fernald

SWDO FILE: U.S. DOE-FEMP, HAZARDOUS WASTE, OH6890008976, HAMILTON COUNTY, TSDf

**NOTICE**

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

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RCRA HAZARDOUS WASTE FACILITY  
COMPLIANCE EVALUATION INSPECTION CHECKLIST

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

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

Street: 7400 WILLEY RD.

City: ROSS State: OH Zip: \_\_\_\_\_

County: HAMILTON Telephone: \_\_\_\_\_

Fax No: \_\_\_\_\_ PUCO No.: \_\_\_\_\_

Owner/Operator: U.S. DOE

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

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

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

Inspection Date: 12/12/01 Time: 0910-1505

Advance notice of inspection given? (yes) X (no) \_\_\_\_\_  
If so, how far in advance? 24 hr.

Name	Agency/Title	Phone
Inspectors: <u>PHIL HARRIS,</u>	<u>OEPA DHWM SWOO</u>	<u>937-285-6090</u>

Facility Representative: <u>ED SKINTIK, DOE</u>	<u>513-648-3151</u>
<u>TIM POFF, FLOWR FERNALD</u>	<u>513-648-5286</u>

STATUS

Cond. Ex. SQG \_\_\_\_\_ SQG \_\_\_\_\_ Large Quantity Generator X  
Treatment \_\_\_\_\_ Storage X Disposal \_\_\_\_\_ Transporter \_\_\_\_\_

Part A Permit: (yes) X (no) \_\_\_\_\_ Part B Permit: (yes) \_\_\_\_\_ (no) X  
LDR Checklist Attached: (yes) \_\_\_\_\_ (no) \_\_\_\_\_ \* PART B PERMIT APPLICATION & ANNUAL UP-DATES PER DFEIOS

ACTIVITIES

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

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 PRODUCTION SITE UNDERGOING CERCLA REMEDIATION & CLOSURE.

LEGACY MIXED WASTES ARE STORED ON-SITE IN CONTAINERS AWAITING SCHEDULING FOR OFF-SITE TREATMENT AND/OR DISPOSAL.

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PERMIT STATUS

GENERAL REQUIREMENTS

Y/N/NA RMK #

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

Y \_\_\_\_\_

When was the owner/operator's Part A submitted:

\_\_\_\_\_

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

NA \_\_\_\_\_

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

\_\_\_\_\_

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

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

Y \_\_\_\_\_

PERMIT BY RULE REQUIREMENTS

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

N \_\_\_\_\_

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

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

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

\_\_\_\_\_

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

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

\_\_\_\_\_

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

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS

IDENTIFICATION NUMBER (OAC 3745-65-11)

Y/N/NA RMK #

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

Y \_\_\_\_\_

ANNUAL REPORT REQUIREMENT (OAC 3745-65-75)

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

Y \_\_\_\_\_

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

3. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat, store or dispose of the waste as required by 3745-65-13(A) (1)?

Y \_\_\_\_\_

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

NA \_\_\_\_\_

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)]

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

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)]

U \_\_\_\_\_

**WASTE ANALYSIS PLAN - LDR REQUIREMENTS**

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

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

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

Y \_\_\_\_\_

Y \_\_\_\_\_

## 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? Y \_\_\_\_\_
- ii. The estimated (or actual) weight, volume or density of the waste? Y \_\_\_\_\_
- 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? NA \_\_\_\_\_
- c. The present physical location of each hazardous waste within the facility and cross references to specific manifest document numbers? Y \_\_\_\_\_
- d. Records of incidents which required implementation of the contingency plan? Y \_\_\_\_\_
- e. Records of any waste analyses and trial tests required to be performed? Y \_\_\_\_\_
- f. Records of the inspections required by the general inspection requirements under 3745-65-15? Y \_\_\_\_\_
- g. Records of any monitoring, or analytical data required under other subparts as referenced by 3745-65-73 (B) (6)? Y \_\_\_\_\_
- 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? NA \_\_\_\_\_

- 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?

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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)]

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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)]

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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)] Y \_\_\_\_\_
- b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] Y \_\_\_\_\_

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

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

REMARKS - SECURITY REQUIREMENTS

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)]? J
- 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

**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**

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4072

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)] \_\_\_\_\_
- 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? \_\_\_\_\_
- 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, Y \_\_\_\_\_
    - a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] ↓ \_\_\_\_\_
- 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?

Y \_\_\_\_\_

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)?

N \_\_\_\_\_

REMARKS - IGNITABLE/REACTIVE/INCOMPATIBLE WASTE REQUIREMENTS



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]

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]

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

**RCRA HAZARDOUS WASTE GENERATOR  
INSPECTION CHECKLIST**

**4072**

Company: U.S. DOE-FEMP (FERNALD) EPA ID#: OH6890008976

Street: 7400 WILLEY RD. City: ROSS

County: HAMILTON State: Ohio Zip: \_\_\_\_\_

Mailing Address: P.O. BOX 538705, CINCINNATI, OH, 45253-8705  
(If different from above)

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

Owner/Operator: U.S. DOE  
(If different from above)

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

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

Inspection Date(s): 12/12/01 Time(s): 0910 - 1505

Inspection Announced?  Yes  NO If so, how much advance notice given? 24 hr.

Inspectors:	Name	Affiliation	Telephone
	<u>PHIL HARRIS</u>	<u>OEPA DHUM SWDO</u>	<u>937-285-6090</u>

Facility Representative:	Name	Telephone
	<u>ED SKINTIK, DOE</u>	<u>513-648-3151</u>
	<u>TIM POFF, FLUOR FERNALD</u>	<u>513-648-5286</u>

Complete All Other Applicable Checklists	
Generator Classification	Waste Management Activity
<input type="checkbox"/> Conditionally Exempt SQG (CESQG)	<input checked="" type="checkbox"/> Containers
<input type="checkbox"/> Small Quantity Generator (SQG)	<input type="checkbox"/> Tank(s)
<input checked="" type="checkbox"/> Large Quantity Generator (LQG)	<input checked="" type="checkbox"/> Land Disposal Requirements (LDR)
<input type="checkbox"/> No Generation	<input checked="" type="checkbox"/> Used Oil
	<input checked="" type="checkbox"/> Universal Waste
	<input checked="" type="checkbox"/> Other <u>MIXED WASTE</u>

CESQG: < 100 Kg. (approximately 25-30 gallons) of waste in a calendar month  
 SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month  
 LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or > 1 Kg. of acutely hazardous waste in a calendar month  
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds

**COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

POLLUTION PREVENTION

1. Has the company undertaken any P2 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 wastes
- 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 P2?

- The company just never thought about it.
- Lack of information about practical alternatives.
- Lack of capital to make process changes.
- Lack of internal management support.
- The company does not generate enough hazardous waste to consider P2.
- Other reason given (specify): \_\_\_\_\_

\_\_\_\_\_



2. Does the company plan to do P2 activities in the future?  Yes  No  N/A \_\_\_ RMK#

3. Would the company be interested in receiving additional information from Ohio EPA about P2?  Yes  No  N/A \_\_\_ RMK#

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4. Did you give the company information about P2 during the inspection?

Yes  No  N/A \_\_\_RMK#

5. Would the company like a P2 assessment?

Yes  No  N/A \_\_\_RMK#

6. If the company does not want a P2 assessment, why not?

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REMARKS

FACILITY IS FORMER URANIUM PRODUCTION SITE.  
THE SITE IS ENGAGED IN CERCLA  
CLEAN-UP/REMEDIATION PROCESS.

HAZARDOUS WASTES HISTORICALLY  
GENERATED BY THE FACILITY ARE  
MIXED WASTES.

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 Ohio EPA on or before March 1<sup>st</sup>? [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. Has the generator notified U.S. EPA of export/import activity? [3745-52-53] Yes \_\_\_ No  N/A \_\_\_RMK#\_\_\_
- b. Has the generator complied with special manifest requirements? [3745-52-54] Yes \_\_\_ No  N/A \_\_\_RMK#\_\_\_
- c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] Yes \_\_\_ No  N/A \_\_\_RMK#\_\_\_
- d. Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes \_\_\_ No  N/A \_\_\_RMK#\_\_\_
- e. Are 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 the date of the last inspection? If so: Yes \_\_\_ No  N/A \_\_\_RMK#\_\_\_
- a. 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#\_\_\_

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

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

REMARKS

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## MANIFEST REQUIREMENTS

You must start this part of the inspection by telling the company representative about the certification statement on the hazardous waste manifest using the following question and statement:

Are you aware of what the statement that you sign on the manifest says? Yes \_\_\_ No \_\_\_

If the answer is no, show them what the statement says using a signed manifest.

**NOTE:** *While the statement is a certification that a P2 strategy is in place, signing the statement does not establish any legal obligations with which the company must comply. In other words, there is no violation of the hazardous waste rules if they sign the manifest and they don't have a program in place.*

1. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes  No  N/A \_\_\_ RMK# \_\_\_

2. Have item I and items (1) through (20) of each manifest been completed? [3745-52-20(B)] Yes  No  N/A \_\_\_ RMK# \_\_\_

**NOTE:** *U.S. 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)]*

3. Does each manifest designate 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)].*

4. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

a. 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# \_\_\_

5. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)] Yes  No  N/A \_\_\_ RMK# \_\_\_

6. 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# \_\_\_

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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# \_\_\_

7. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]

Yes  No  N/A \_\_\_ RMK# \_\_\_

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REMARKS

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PERSONNEL TRAINING

- 1. Does the generator keep 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 descriptions, 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. Does the generator have 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. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]
  - 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 3(a), (b) and (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#\_\_\_

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## CONTINGENCY PLAN

1. Does the generator have 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 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. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)(B)] Yes  No  N/A \_\_\_RMK#\_\_\_
4. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] Yes  No  N/A \_\_\_RMK#\_\_\_

## EMERGENCY COORDINATOR

5. Is an emergency coordinator 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*

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Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:

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

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PREPAREDNESS AND PREVENTION [3745-52-34(A)(4)]

- 1. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] Yes  No  N/A \_\_\_RMK#\_\_\_
  
- 2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [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. Is emergency equipment tested (inspected) on a weekly basis and maintained as necessary? [3745-65-33(A)] Yes  No  N/A \_\_\_RMK#\_\_\_
  
- 4. Are emergency equipment tests (inspections) 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. Do 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. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] Yes  No  N/A \_\_\_RMK#\_\_\_
  
- 7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] Yes  No  N/A \_\_\_RMK#\_\_\_

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a. Where authorities have declined to enter into arrangements/agreements, has the generator documented such a refusal? [3745-65-37(B)]

Yes  No  N/A  RMK#

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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#   
 \* FACILITY IS DOE SITE STRING LEGACY MIXED WASTES.

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

- 2. Does the generator ensure that satellite accumulation area(s):
  - a. Are at or near a point of generation? Yes  No  N/A  RMK#
  - b. Are under the control of the operator of the process generating the waste? Yes  No  N/A  RMK#
  - c. Do not exceed a total of 55 gallons of hazardous waste? Yes  No  N/A  RMK#
  - d. Do not exceed one quart of acutely hazardous waste at any one time? Yes  No  N/A  RMK#
  - e. Containers are marked with the 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 Ohio EPA's November 1994 Guidance on the Location of Satellite Accumulation Areas.

- 3. Is the generator 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 three days? Yes  No  N/A  RMK#
  - b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? Yes  No  N/A  RMK#

USE AND MANAGEMENT OF CONTAINERS

- 4. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes  No  N/A  RMK#
- 5. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes  No  N/A  RMK#
- 6. Are hazardous wastes stored in containers which are:

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- 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 No. 7 recorded in a log which contains the following information: [3745-66-74(B)]
  - a. Date and time of inspection? Yes  No  N/A \_\_\_ RMK# \_\_\_
  - b. Name of inspector? Yes  No  N/A \_\_\_ RMK# \_\_\_
  - c. Observations made during the inspection? Yes  No  N/A \_\_\_ RMK# \_\_\_
  - d. Date/nature of any repairs or remedial action? Yes  No  N/A \_\_\_ RMK# \_\_\_
- 9. For ignitable and/or reactive hazardous waste(s):
  - a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes  No  N/A \_\_\_ RMK# \_\_\_
  - b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] Yes  No  N/A \_\_\_ RMK# \_\_\_

**PRE-TRANSPORT REQUIREMENTS**

- 10. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] Yes  No  N/A \_\_\_ RMK# \_\_\_
- 11. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes  No  N/A \_\_\_ RMK# \_\_\_
- 12. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

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**REMARKS**

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## LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] If so: Yes  No  N/A \_\_\_ RMK# \_\_\_
- a. For determinations based solely on knowledge of the waste: Is supporting data retained on-site? [3745-270-07(A)(6)] Yes  No  N/A \_\_\_ RMK# \_\_\_
- b. For determinations based upon analytical testing: Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes  No  N/A \_\_\_ RMK# \_\_\_
2. Has the generator determined each Ohio EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2), see Table 1] Yes  No  N/A \_\_\_ RMK# \_\_\_
3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes  No  N/A \_\_\_ RMK# \_\_\_
4. Does the generator generate a characteristic hazardous waste? If so: Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes  No  N/A \_\_\_ RMK# \_\_\_
- NOTE:** *If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.*
5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] If so: Yes  No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(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 OAC Rule 3745-270-09(B)]*
6. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [3745-270-07(A)(1)] Yes  No  N/A \_\_\_ RMK# \_\_\_

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] Yes  No  N/A \_\_\_ RMK# \_\_\_

**NOTE:** A generator may dilute a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit (§402 of CWA), that treats waste in a CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non-wastewater.[3745-270-03(B)]

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] Yes  No  N/A \_\_\_ RMK# \_\_\_

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes  No  N/A \_\_\_ RMK# \_\_\_

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment.[3745-270-05]

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

a. The facility can land dispose of the waste. [3745-270-06]

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? If so: Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

a. Has the facility complied with 3745-270-04? Yes \_\_\_ No  N/A \_\_\_ RMK# \_\_\_

**REMARKS**

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NOTIFICATION AND CERTIFICATION REQUIREMENTS

12. If a generators' waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1? [3745-270-07(A)(2)] Yes  No  N/A  RMK# \_\_\_\_\_
13. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1? [3745-270-07(A)(3)] Yes  No  N/A  RMK# \_\_\_\_\_
14. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1? [3745-270-07(A)(4)] Yes  No  N/A  RMK# \_\_\_\_\_
15. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1? [3745-270-07(A)(9)] Yes  No  N/A  RMK# \_\_\_\_\_
16. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so: Yes  No  N/A  RMK# \_\_\_\_\_
- a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes  No  N/A  RMK# \_\_\_\_\_

**NOTE:** Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit. (See 270-07(A)(7))

17. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)] Yes  No  N/A  RMK# \_\_\_\_\_

**REMARKS**