



State of Ohio Environmental Protection Agency
Southwest District

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Dayton, Ohio 45402-2911

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February 20, 2004

Mr. William J. Taylor, Director
U.S. Department of Energy
Fernald Environmental Management Project
P.O. Box 538705
Cincinnati, Ohio 45253-8705

LIBRARY:
FILE: 54933
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FERNALD
LOG E-0459

SUBJECT: HAZARDOUS WASTE COMPLIANCE EVALUATION INSPECTION (CEI)

Dear Mr. Taylor:

On January 29, 2004, Tom Koch 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. Tom and I represented the Ohio EPA for this inspection, and the DOE-FEMP facility was represented primarily by Mr. Ed Skintik, (DOE) and by Mr. Tim Poff and Ms. Elizabeth Brucken, (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. Our 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 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.

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 me at (937) 285-6090.



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Bob Taft, Governor
Jennette Bradley, Lt. Governor
Christopher Jones, Director

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Mr. William J. Taylor, U.S. DOE-FEMP
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Sincerely,



Phillip C. Harris
Division of Hazardous Waste Management

Attachment

cc: Tammy McConnell, Ohio EPA, CO

cc: w/o attachment:

Ed Skintik, DOE
Tim Poff, Fluor Fernald

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

OHIO PART B PERMITTED FACILITY
RCRA INSPECTION CHECKLIST

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

Ohio Permit: N/A ^{*SEE PERMIT STATUS}

Address: 7400 WILLEY RD.
CINCINNATI, OH 45030

U.S. EPA ID: OH6890008976
Phone: 513-648-3101

County: HAMILTON

Inspection Date: 1/29/2004

Time: 1015-1620

Was advance notice of the inspection given? YES NO
If so, how far in advance? 18 hrs

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspectors:	<u>PHIL HARRIS</u>	<u>OH EPA ES3</u>	<u>937-285-6090</u>
	<u>TOM KOCH</u>	<u>OH EPA ES2</u>	<u>937-285-6594</u>
	<u>ED SKINTIK</u>	<u>DOE</u>	
Facility Reps:	<u>TIM POFF</u>	<u>FLUOR FERNALD</u>	

Is facility operating as a generator? YES NO

If so, complete the applicable sections of the Generator Requirements checklist for wastes being managed under generator status.

PERMIT STATUS

Permit Issued: NO
Permit Effective Date: N/A
Permit Expiration Date: N/A
Permit Renewal Date: N/A
Permit Modification Date(s): N/A

LDR Checklist Attached: Yes No
Used Oil Checklist Attached: Yes No
Generator Checklist Attached: Yes No

DEFOS EXEMPT FACILITY FROM PART B PERMIT; BUT REQUIRES RCRA MGT STANDARDS CONTAINED IN FACILITY PART B APPLICATION.

AUTHORIZED ACTIVITIES

STORAGE		TREATMENT		DISPOSAL	
<input checked="" type="checkbox"/>	Containers	<input type="checkbox"/>	Tanks	<input type="checkbox"/>	Injection Well
<input type="checkbox"/>	Tanks	<input type="checkbox"/>	Incinerator	<input type="checkbox"/>	Landfill
<input type="checkbox"/>	Waste Pile	<input type="checkbox"/>	Thermal Treatment	<input type="checkbox"/>	Land Application
<input type="checkbox"/>	Surface Impoundment	<input type="checkbox"/>	Post-Closure	<input type="checkbox"/>	Surface Impoundment

Post-Closure Care Corrective Action

PROCESS DESCRIPTION/WASTE ACTIVITIES SUMMARY

Facility Name: U.S. DE-TEMP (FERNALD) Facility Type: LOG/SOG/ICESOG(TSD) EPA ID#: OH6890008976

Ⓚ CERCLA SITE UNDERGROUND OCCURE

		Description of Waste				On-Site Management			Off-Site Management	P2 Activities
Process/Activity (e.g. plating bath, machining, baghouse, painting, etc)	Waste Generated (e.g. sludge, spent solvent, ash, etc)	EPA Waste Code	QTY Generated per Month	Type of Accumulation/Storage (e.g. container, tank, etc)	Type of On-Site Treatment (recycle, wwt, etc)	Waste Location (Include map, if possible)	Name, state, and type of activity occurring at the facility.			
1 LEGACY MIXED WASTE				STORAGE CONTAINERS			OFF-SITE SHIPMENTS FOR DISPOSAL PER FACILITY SITE TREATMENT PLAN	N/A		
2 SITE GENERATED WASTE D&D				"			"	"		
3 MAINTENANCE	USED OIL OBTAIN FUEL			"			"	"		
4										
5										

REMARKS-GENERAL INFORMATION

General Process Information:

FACILITY IS FORMER DOE URANIUM PROCESSING SITE UNDERGOING CERCLA REMEDIATION & CLOSURE.

FACILITY'S LEGACY HAZARDOUS WASTE & MIXED WASTES STORED ON SITE IN CONTAINERS. OHIO EPA DNUM DF&OS EXEMPT FACILITY FROM PART B PERMIT, AND REQUIRE RCRA MANAGEMENT STANDARDS DESCRIBED IN FACILITY PART B PERMIT APPLICATION. TREATMENT & DISPOSAL OF FACILITY LEGACY WASTES ARE SCHEDULED & ACCOMPLISHED THROUGH CERCLA AND FFCA-STP AGREEMENTS & PLANS.

Regulatory/Enforcement History (if applicable):

N/A

Other:

P2/WASTE MIN ISSUES ARE N/A CONSIDERING NATURE OF LEGACY MIXED WASTES.

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

- 1. Has the expiration date of the permit passed? If so:
 - Yes ___ No ___ N/A RMK# ___
 - a. Is the permittee continuing any activity regulated by the permit after the expiration date of the permit?
 - Yes ___ No ___ N/A RMK# ___
 - b. Has the facility submitted an application for a permit renewal to the director no later than 180 days prior to the expiration date of the permit? [Condition A.6]
 - Yes ___ No N/A RMK# ___

- 2. Has the permittee submitted the annual permit fee, payable to "Treasurer, State of Ohio," to Ohio EPA on or before the anniversary of the date of issuance during the term of the permit? [Condition A.25]
 - Yes ___ No N/A RMK# ___

- 3. Is the permittee conducting any hazardous waste management activities (not otherwise exempt by law) which are not authorized by the permit? [Conditions A.1(b) and A.5]
 - Yes No ___ N/A RMK# ___

- 4. Have any provisions of the permit been identified as invalid? [Condition A.4]
 - Yes No ___ N/A RMK# ___

- 5. Has the facility identified any instances of noncompliance with the permit, ORC Chapter 3734, or the rules adopted thereunder, which may endanger human health or the environment? If so:
 - a. Did the facility immediately report the following to Ohio EPA's Emergency Response Unit? [Condition A.20]
 - 1. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and
 - Yes ___ No N/A RMK# ___

ii. Information concerning a release of hazardous waste, fire or explosion at the facility which could threaten human health or the environment outside the facility including a description of:

- A. Name, address and telephone number of the owner/operator?
- B. Name, address and telephone number of the facility?
- C. Name and quantity of material(s) involved?
- D. The extent of injuries, if any?
- E. An assessment of the actual or potential hazard to the environment and human health outside the facility?
- F. Estimated quantity and disposition of recovered material that resulted from the incident?

Yes___ No N/A | RMK#___

6. Did the permittee provide a written report to Ohio EPA's Emergency Response Unit and DHWM within five days of becoming aware of the circumstances reported in Questions No. 5? If so, did the report contain: [Condition A.21]

- a. A description of the noncompliance and its cause (including exact dates and times)?
- b. Whether the noncompliance has been corrected and if-not, the anticipated time noncompliance is expected to continue? and
- c. Steps taken or planned to minimize the impact on the environment and to reduce, eliminate and prevent recurrence of the noncompliance?

Yes___ No N/A | RMK#___

Yes___ No N/A | RMK#___

Yes___ No N/A | RMK#___

NOTE: The permittee need not comply with the five day written report requirement if the director, upon good cause shown by the permittee, waives that requirement and the permittee submits a written report within 15 days of the time the permittee became aware of the circumstances. [Condition A.21].

7. Has the permittee identified other instances of noncompliance not provided for in Condition A.22, if so:
- Yes___ No N/A RMK#___
- a. Did the permittee report these instances to Ohio EPA, DHWM? [Condition A.22]?
Yes___ No N/A ___ RMK#___
- b. Do the reports provided contain the information set forth in Condition A.20? [Condition A.20]
Yes___ No N/A ___ RMK#___
- c. Has the permittee taken all steps necessary to minimize releases to the environment or prevent any adverse impact on human health or the environment? [Condition A.8]
Yes___ No N/A ___ RMK#___

8. Has the permittee planned any changes in the permitted facility or activity which may result in noncompliance with the conditions of the permit?:
- Yes___ No___ N/A RMK#___
- a. If so, has the facility provided Ohio EPA with advance notice of such changes? [Condition A.17]
Yes___ No N/A ___ RMK#___

NOTE: Such notification does not waive the permittee's duty to comply with the permit. [Condition A.17]

9. Has the permittee become aware that it failed to submit any relevant facts in the permit or issuance proceedings or that it submitted incorrect or incomplete information in permit issuance proceedings or other submissions to Ohio EPA or the Hazardous Waste Facility Board (HWFB)? If so:
- Yes___ No___ N/A RMK#___
- a. Has the permittee properly submitted such facts or corrected information to the appropriate entity? [Condition A.24]
Yes___ No N/A ___ RMK#___

PERMIT MODIFICATION, REVISION, REVOCATION

10. Has the permittee filed a request for a permit modification, revision or revocation since permit issuance? [Condition A.2] Yes___ No___ N/A RMK#___

11. Has the permit, been transferred to a new owner/operator? If so: Yes___ No___ N/A RMK#___

a. Has the transfer been conducted in accordance with ORC Chapter 3734. and the rules adopted thereunder which includes the permittee notifying the new owner in writing of the requirements of ORC Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules before transferring ownership? [Condition A.18] Yes___ No N/A RMK#___

12. Has the permittee submitted reports in any compliance schedule of the permit to Ohio EPA no later than 14 days following each scheduled date, unless otherwise specified? [Condition A.19] Yes___ No N/A RMK#___

13. Has the permittee furnished relevant information which Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, to determine compliance with the permit? [Condition A.10] Yes___ No N/A RMK#___

14. Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10] Yes___ No N/A RMK#___

15. Is the permittee maintaining records of all data used to complete the application and any amendments, revisions or modifications to the application? [Condition A.14©] Yes___ No N/A RMK#___

16. Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14©] Yes___ No N/A RMK#___

17. Is the permittee planning any physical alterations or additions to any permitted portions of the facility? If so: Yes___ No___ N/A RMK#___

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a. Has the permittee given notice to the director of such alterations/additions? [Condition A.15]

Yes ___ No N/A RMK# ___

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SITE ENTRY - AVAILABILITY OF RECORDS

18. ~~As specified in Condition A-11;~~ has the permittee allowed the director or an authorized representative, upon proper identification to:

a. Enter at reasonable times upon the premises where a regulated activity is located or where records are kept under the conditions of the permit?

Yes No N/A ___ RMK# ___

b. Have access to and copy, at reasonable times, any records required to be kept under the conditions of the permit?

Yes No N/A ___ RMK# ___

c. Inspect, at any time, facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit?

Yes No N/A ___ RMK# ___

d. Sample, document, photograph or monitor, at reasonable times, any substances or parameter at the location of the facility to assure compliance with the permit or as otherwise authorized by ORC Chapter 3734. and the rules adopted thereunder?

Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM PART B APPLICATION

Note: *The inspector or permit writer may add questions pertaining to the permittee's application, as appropriate.*

REMARKS

RECORDKEEPING/OPERATING REQUIREMENTS

OPERATING RECORD

1. In accordance with OAC rules 3745-54-73 and 3745-54-74 and ~~Condition B.22 of the permit~~, does the permittee maintain an Operating Record which contains the following information:

a. A description of the quantity of each hazardous waste and the method(s) and date(s) of its treatment or storage? Yes No N/A ___ RMK# ___

b. The location of each hazardous waste and quantity at each location including cross-reference to specific manifest numbers? Yes No N/A ___ RMK# ___

c. Records and results of required waste analysis? Yes No N/A ___ RMK# ___

d. Summary reports and details of all incidents that required implementation of the contingency plan? Yes No N/A ___ RMK# ___

e. Records and results of required inspections? Yes No N/A ___ RMK# ___

f. Documents required to be maintained by LDR requirements of OAC Chapter 3745-270? Yes No N/A ___ RMK# ___

g. Monitoring, testing, or analytical data, and corrective action where required, from groundwater monitoring and required monitoring of surface impoundments, landfills, waste piles and land treatment units? [3745-54-73(B)(6)] Yes ___ No N/A RMK# ___

h. **For disposal facilities**, location and quantity of each hazardous waste record on a facility map and cross-references to manifest document numbers? [3745-54-73(B)(2)] Yes ___ No N/A RMK# ___

DOCUMENTS TO BE MAINTAINED AT FACILITY

2. ~~In accordance with Condition A.28 of the permit~~, is the permittee maintaining the following documents at the facility:
- a. Waste analysis plan in accordance with OAC rule 3745-54-13? Yes No N/A RMK#
- b. Contingency plan in accordance with OAC rule 3745-54-53? Yes No N/A RMK#
- c. Closure plan in accordance with OAC rule 3745-55-12? Yes No N/A RMK#
- d. Cost estimate for facility closure in accordance with OAC rule 3745-55-42? (Estimate only - adequacy will be evaluated by CO financial assurance personnel) [Condition B.36] Yes No N/A RMK#
- e. Personnel training plan and records required by OAC rule 3745-54-16? [Condition B.6] Yes No N/A RMK#
- f. Inspection schedules developed in accordance with OAC rules 3745-54-15, 3745-55-74 and 3745-55-95? [Condition B.5] Yes No N/A RMK#
- g. Operating record in accordance with OAC rule 3745-54-73? [Condition B.22] Yes No N/A RMK#
- h. Post-closure plan, as required by OAC rule 3745-55-18(A)? [Condition A.28(a)(viii)] Yes No N/A RMK#
- i. Annually-adjusted cost estimate for facility closure and post-closure, as required by OAC rules 3745-55-42 and 3745-55-44? [Condition A.28(a)(ix)] Yes No N/A RMK#
3. Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from date of inspection? [Condition B.5] Yes No N/A RMK#

4. Have any of the documents in Question No. 2 been revised? ~~[Condition A.15]~~ If so:

Yes No N/A RMK#

a. Has the permittee submitted the revisions to Ohio EPA in accordance with OAC rule 3745-50-51?

Yes No N/A RMK#

b. Have all requirements of OAC rule 3745-50-51 been met, including, where required, Ohio EPA approval?

Yes No N/A RMK#

ANNUAL REPORT REQUIREMENT

5. Is the permittee complying with annual report requirements set forth in OAC rule 3745-54-75 and the additional report requirements set forth in OAC rule 3745-54-77? [Condition B.25]

Yes No N/A RMK#

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

6. ~~In compliance with Condition 12(b) of the permit,~~ do the permittee's records of monitoring information specify the:

a. Date(s), exact place(s), time(s) and method(s) of sampling or measurement?

Yes No N/A RMK#

b. Individual(s) who performed the sampling or measurement?

Yes No N/A RMK#

c. Date(s) analyses were performed?

Yes No N/A RMK#

d. Individual(s) who performed the analyses?

Yes No N/A RMK#

e. Analytical technique(s) or method(s) used?

Yes No N/A RMK#

f. Results of such analyses?

Yes No N/A RMK#

7. Have the methods used to obtain a representative sample of the waste to be analyzed included the appropriate SW-846 method or an equivalent method specified in the approved waste analysis plan? [~~Condition 12(a)~~]

Yes No N/A ___ RMK# ___

OR IN APPROPRIATE CERCLA DOCUMENTATION

8. ~~In accordance with Condition A.14 of the permit,~~ is the permittee retaining records of monitoring information as required by the permit for at least three years from the date of sampling, including:

a. All calibration and maintenance records.

Yes No N/A ___ RMK# ___

9. Has Ohio EPA requested submittal of any reports or other information from the permittee? If so:

Yes No ___ N/A ___ RMK# ___

a. Have the submittals been signed and certified according to OAC rule 3745-50-42? [Condition A.13]

Yes ___ No N/A RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

REMARKS

WASTE MINIMIZATION REQUIREMENTS

1. Does the permittee certify at least once every year that a program is in place to reduce the volume and toxicity of hazardous waste generated in accordance with ~~Condition A.29(a)~~ and OAC rule 3745-54-73?

Yes ___ No N/A RMK# ___

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2. Did the permittee submit the waste minimization report to Ohio EPA, Office of Pollution Prevention and _____ District Office within 180 days of journalization of this permit? and updates biennially thereafter? [Condition A.29©]]

Yes___ No N/A RMK#___

3. Has the permittee reduced the amount of waste (hazardous waste, solid waste, air emission, waste water discharges, etc.) this year generated at their facility by implementing pollution prevention/waste minimization?

Yes___ No___ N/A RMK#___

If so, what amount of waste has the permittee reduced this year? _____

4. Has the permittee's company saved much money this year by implementing pollution prevention (reducing raw material usage, disposal fees, energy savings, etc.)?

Yes___ No___ N/A RMK#___

If so, how much money has the permittee's company saved this year? _____

NOTE: If this facility is inspected two times a year, the information obtained in questions 3 & 4 only needs to be collected one time for the calendar year.

REMARKS

GROUND WATER MONITORING

1. Has the permittee conducted semi-annual sampling of their monitoring wells?

Yes___ No N/A RMK#___

2. Have they reported the results in the Annual Report to the director by March 1st as required by Condition B.25?

Yes___ No N/A RMK#___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

REMARKS

WASTE ACCEPTANCE AND GENERATION

- 1. Is the permittee storing any containers of hazardous waste received from any off-site source that permittee is not permitted to store? [Condition A.1.]
Yes No N/A ___ RMK# ___
- 2. Has the permittee arranged to receive hazardous waste from a foreign or off-site source that the permittee is not permitted to store? [Condition A.1.]
Yes No N/A ___ RMK# ___
- 3. Has the permittee notified the director at least four weeks prior to the date the permittee expects to receive hazardous waste from a foreign source, as required by OAC rule 3745-54-12(A)? [Condition B.2(a)]
Yes ___ No N/A RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

REMARKS

OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS

- 1. Is the permittee complying with the following manifest requirements set forth in OAC Chapter 3745-52 and OAC rules 3745-54-70, 3745-54-71, 3745-54-72 and 3745-54-76: [Condition B.24]

a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, U.S. EPA Form 8700-22 and, if necessary, U.S. EPA Form 8700-22A in compliance with OAC rule 3745-52-20(A)?

Yes No N/A ___ RMK# ___

b. The manifest form used contains all information required by OAC rule 3745-52-20 and the minimum number of copies required by OAC rule 3745-52-22?

Yes No N/A ___ RMK# ___

c. The permittee has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with OAC rule 3745-52-20(B)(C)(D)?

Yes No N/A ___ RMK# ___

d. Prepared manifests have been signed by the permittee and initial transporter in compliance with OAC rule 3745-52-23?

Yes No N/A ___ RMK# ___

2. As a permittee that generates hazardous waste, are signed copies of all hazardous waste manifests and any documentation required for exception reports retained for at least three years at the facility as required by OAC rules 3745-52-40 and 3745-54-71(A)(5)?

Yes No N/A ___ RMK# ___

NOTE: If the permittee is generating hazardous waste, remember to attach a complete generator checklist.

3. Does the permittee use only properly registered transporters when removing hazardous wastes?

Yes No N/A ___ RMK# ___

~~[Condition A.16]~~

Transporters:

4. Does the permittee give one copy of the manifest to the transporter, send one copy to the generator within 30 days, and keep one copy for at least three years? [3745-54-71(A)]

Yes No N/A RMK# _____

a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met? [3745-54-71(B)]

Yes No N/A RMK# _____

b. Are any significant discrepancies in the manifest, as defined in 3745-54-72(A) noted in writing on the manifest document?

Yes No N/A RMK# _____

5. Have any manifest discrepancies been reconciled within 15 days as required by 3745-54-72(B)? If not:

Yes No N/A RMK# _____

a. Has the owner/operator submitted the required information to the director?

Yes No N/A RMK# _____

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 3745-54-76(A) been submitted to the director within 15 days?

Yes No N/A RMK# _____

WASTE ANALYSIS/WASTE ANALYSIS PLAN

1. Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information of the waste in accordance with OAC Chapters 3745-54 to 3745-57, 3745-218 and 3745-270 and the terms and conditions of the permit? [~~Condition B-3(a)~~]

Yes No N/A RMK# _____

2. Does the permittee follow the procedures described in the WAP (Application _____)? [~~Condition B-3(b)~~]

Yes No N/A RMK# _____

3. In accordance with OAC rule 3745-54-13(A)(3), does the permittee repeat the waste analysis when the process or operation generating the hazardous waste has changed, or at least annually? [~~Condition B-3~~]

Yes No N/A RMK# _____

4. **FOR OFF-SITE FACILITIES:** Are the sampling methods and procedures specified in the permittee's WAP that 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 [3745-54-13©)]?

Yes___ No N/A RMK#___

5. **FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER OAC 3745-270-04(A):**

Does the waste analysis plan include procedures and schedules for:

i. The sampling of impoundment contents? [3745-54-13(B)(7)]

Yes___ No N/A RMK#___

ii. The analysis of test data? [3745-65-13(B)(7)]

Yes___ No N/A ___ RMK#___

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 (OAC 3745-270-40 to 3745-270-49) or where no treatment standards have been established? [3745-54-13(B)(7)]

Yes___ No N/A ___ RMK#___

6. **Where applicable:** The methods which will be used to meet additional waste analysis requirements for specific waste management methods specified in rules 3745-54-17, 3745-57-14, 3745-57-41 and 3745-270-07 of the OAC? [3745-54-13(B)(6)]

Yes___ No N/A RMK#___

7. Does the permittee place the results of all waste analyses in the facility operating record in accordance with OAC rule 3745-54-73?

Yes No N/A ___ RMK#___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

REMARKS

GENERAL INSPECTION REQUIREMENTS

NOTE: Inspector may attach a copy of the inspection procedures and schedules. If so, the attached document is referenced as Appendix _____.

1. Is the permittee following the inspection procedures and schedules as set forth in the permit (_____ of the approved Part B permit application) and the requirements of OAC rules 3745-54-15(A), (C) and (D)? [Condition B.5] Yes No N/A _____ RMK# _____

2. Is the permittee following the approved inspection schedule for inspecting: monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment as specified in OAC rule 3745-54-15(B)? Yes No N/A _____ RMK# _____

a. Is the schedule kept at the facility? [OAC rule 3745-54-15(B)(2)] Yes No N/A _____ RMK# _____

3. Does the permittee remedy deterioration or any malfunctions discovered by an inspection as required by OAC rule 3745-54-15(C)? [Condition B.5] Yes No N/A _____ RMK# _____

4. In accordance with OAC rule 3745-54-15(D) and Condition B.5 of the permit, do inspection records contain the following information:

a. Date and time of inspection? Yes No N/A _____ RMK# _____

b. Name of inspector? Yes No N/A _____ RMK# _____

c. Notation of observations made? Yes No N/A _____ RMK# _____

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d. Date and nature of any repairs or other remedial actions?

Yes No N/A RMK#

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: *The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.*

REMARKS

SECURITY REQUIREMENTS

1. Is the permittee complying with the following security provisions of OAC rule 3745-54-14 and ~~Condition B.4~~ of the permit: [of the Part B permit application]

a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility? Yes No N/A RMK#

b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility? Yes No N/A RMK#

c. A means to control entry, at all times, through gates or other entrances, to the active portion of the facility? Yes No N/A RMK#

2. In accordance with OAC rule 3745-54-14©), does the permittee have signs reading "Danger - Unauthorized Personnel Keep Out" posted at entrances of the hazardous waste container storage building number ? Yes No N/A RMK#

FACILITY OPERATIONS

3. Is construction, maintenance and operation of the facility being conducted to minimize the possibility of a fire, explosion, or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, ground or surface water? [OAC rule 3745-54-31; ~~Condition B.4~~]- Yes No N/A RMK#

4. Does the permittee properly maintain and operate the facility to achieve compliance with the terms and conditions of the permit including ~~[Condition A.9]~~

a. Effective management practices? Yes No N/A RMK#

b. Adequate funding? Yes No N/A RMK#

c. Adequate operator staffing and training? Yes No N/A RMK#

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d. Adequate laboratory and process controls?

Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

REMARKS

PERSONNEL TRAINING

1. Is the permittee conducting personnel training in accordance with the conditions of the permit and with the following requirements of OAC rule 3745-54-16? [Condition B.6]

Yes No N/A ___ RMK# ___

a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC rule 3745-54-16(A)(B)©]

Yes No N/A ___ RMK# ___

b. The facility provides personnel training to new employees within six months after their date of employment as required by OAC rule 3745-54-16(B)?

Yes No N/A ___ RMK# ___

c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16©)?

Yes No N/A ___ RMK# ___

2. Is the permittee maintaining personnel training records as required by OAC rule 3745-54-16(D) and of the approved application, including: written job titles, job descriptions and documented employee training records? ~~[Condition B.6]~~

Yes No N/A ___ RMK# ___

INSPECTION ITEMS FROM THE PART B APPLICATION

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NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

REMARKS

REQUIRED EQUIPMENT

NOTE: Inspector may attach a list of emergency equipment. If so, the attachment document is referenced as Appendix _____.

1. Has the permittee equipped the facility with the following emergency equipment as required by OAC rule 3745-54-32 and ~~Condition B.9 of the permit.~~

a. An internal communications or alarm system?

Yes No N/A _____ RMK# _____

b. A device such as a telephone which is capable of summoning emergency assistance from local emergency authorities?

Yes No N/A _____ RMK# _____

c. Portable fire extinguishes and/or fire control equipment, spill control and decontamination equipment?

Yes No N/A _____ RMK# _____

d. Water in adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers or water spray systems?

Yes No N/A _____ RMK# _____

2. Is the permittee inspecting, testing and maintaining the equipment specified in Question No. 1 to ensure its proper operating in accordance with OAC rule 3745-54-33 and Condition B.10 of the permit?

Yes No N/A _____ RMK# _____

3. Whenever hazardous waste is being managed at the facility, has the permittee provided all personnel involved in the operation with immediate access to an internal alarm or emergency communication device as required by OAC rule 3745-54-34 and Condition B.11 of the permit?

Yes No N/A _____ RMK# _____

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

REMARKS

CONTINGENCY PLAN - EMERGENCY PROCEDURES

1. In compliance with ~~Condition B.13 of the permit and~~ OAC rule 3745-54-37(A) and (B), does the permittee:

a. Familiarize emergency response agencies with the layout of the facility, associated hazards, places where personnel will normally be working, entrances and possible evacuation routes?

Yes No N/A ___ RMK# ___

b. Inform such agencies of safety equipment, supplies, proper emergency safety procedures that are applicable to the facility?

Yes No N/A ___ RMK# ___

c. Familiarize the local hospital listed in the approved application with the properties of hazardous waste handled at the facility and the types of injuries or illness that could result from fires, explosions or releases at the facility?

Yes No N/A ___ RMK# ___

2. Has a state or local agency declined to enter into the arrangements set forth in OAC rule 3745-54-37(A)? If so:

Yes ___ No ___ N/A RMK# ___

a. Has the permittee documented the refusal in the operating record as required by OAC rule 3745-54-37(B)? [Condition B.13(b)]

Yes ___ No N/A RMK# ___

3. Has the permittee, in accordance with OAC rule 3745-54-53 submitted a copy of the approved contingency plan (including amendments, revisions or changes) to all local authorities, agencies and response contractors designated in the approved contingency plan? [~~Condition B.18(b)~~]

Yes No N/A RMK#

4. Has the permittee notified all parties identified in the contingency plan in writing of amendments, modifications, or revisions to the plan within ten days of the effective date of the change in the plan? [~~Condition B.18(b)~~]

Yes No N/A RMK#

5. Has the permittee submitted a copy of the approved contingency plan and all revisions, amendments and modifications to the Ohio EPA, Division of Emergency and Remedial Response (DERR) in accordance with OAC rule 3745-54-53? [~~Condition B.18(c)~~]

Yes No N/A RMK#

6. Is the permittee reviewing the approved contingency plan at least annually and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [~~Condition B.17~~]

Yes No N/A RMK#

NOTE: Also see Question No. 4 of Recordkeeping Requirements to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.

EMERGENCY COORDINATOR

7. In accordance with OAC rule 3745-54-55 and ~~Condition B.19 of the permit~~, is an emergency coordinator on premises or on call at all times?

Yes No N/A RMK#

8. In accordance with OAC rule 3745-54-55 and ~~Condition B.19 of the permit~~, is/are the emergency coordinator(s) at the facility familiar with the following:

a. Contingency plan?

Yes No N/A RMK#

b. Facility operations/activities?

Yes No N/A RMK#

c. Waste characterization and location?

Yes No N/A ___ RMK# ___

d. Location of all records in the facility?

Yes No N/A ___ RMK# ___

e. Facility layout?

Yes No N/A ___ RMK# ___

9. In accordance with OAC rule 3745-54-55, does/do the emergency coordinator(s) have the authority to commit the resources needed to carry out the contingency plan?

Yes No N/A ___ RMK# ___

~~[Condition B.19]~~

10. Does the permittee have a contingency plan for the facility that: ~~[Condition B.19]~~

a. Describes the actions facility shall take to comply with OAC rules 3745-54-51 through 3745-54-56 in response to fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil or surface water at the facility?

Yes No N/A ___ RMK# ___

b. Describes arrangements agreed to by local police, fire departments, hospitals, contractors and Ohio EPA and the local emergency response team to coordinate emergency services?

Yes No N/A ___ RMK# ___

c. Includes an up-to-date list of names, addresses and phone numbers (office and home) for all persons qualified to act as emergency coordinator in the order that they will assume responsibility for coordination of emergency response?

Yes No N/A ___ RMK# ___

d. Includes a list of all emergency equipment, including fire extinguishing systems, spill control equipment, communications and alarm systems and decontamination equipment?

Yes No N/A ___ RMK# ___

e. Includes the location and a physical description of each item on the list referenced in Question No. 10(d), and a brief outline of its capabilities?

Yes No N/A ___ RMK# ___

f. Includes an evaluation plan for facility personnel describing signals to be used to begin evacuation, evacuation routes, and alternate evacuation routes, in situations where the primary routes could be blocked by releases of hazardous waste?

Yes No N/A RMK# _____

REMARKS

IMPLEMENTATION OF CONTINGENCY PLAN

11. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents at the facility including spill or release of hazardous waste or hazardous waste constituents greater than or equal to 55 gallons; any spill or release of hazardous waste or hazardous waste constituents less than 55 gallons may result in a fire or explosion hazard as determined by the Emergency Coordinator; or any spill on-site that may potentially cause on or off-site soil and/or ground or surface water contamination; any spill or release of hazardous waste or hazardous waste constituents that is reported to the National Response Center or local (city or county) emergency response center because the spill exceeded the "RQ" limits; any fire involving hazardous waste; any explosion involving hazardous waste; since the date of the last inspection? If so:

Yes _____ No N/A _____ RMK# _____

a. Did the permittee immediately implement the approved contingency plan and follow the emergency procedures described in OAC rule 3745-54-56? [Conditions B.14 and B.20]

Yes _____ No N/A _____ RMK# _____

b. Did the permittee immediately notify Ohio EPA's emergency response team using the 24-hour toll free number (800)282-9378 providing the following information: [OAC rule 3745-54-56(D)(2)]

i. Name and telephone number of the reporter?

Yes _____ No N/A _____ RMK# _____

ii. Name and address of the facility?

Yes _____ No N/A _____ RMK# _____

- iii. Time and type of incident? Yes___ No N/A ___ RMK#___
- iv. Name and quantity of materials involved? Yes___ No N/A ___ RMK#___
- v. The extent of injuries? Yes___ No N/A ___ RMK#___
- vi. The possible hazards to human health or the environment outside the facility? Yes___ No N/A ___ RMK#___
- c. Did the permittee collect and manage as hazardous waste all liquid or solid material resulting from fire, explosion, released material or emergency response materials until such time as the permittee can demonstrate to Ohio EPA that such waste are not hazardous wastes? [Condition B.16] Yes___ No N/A ___ RMK#___
- d. Within 15 days of the incident did the permittee submit to the director a written report of the incident? If so: Yes___ No N/A ___ RMK#___
 - i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23] Yes___ No N/A ___ RMK#___
- e. Did the permittee note in the operating record the time, date and details of any incident that required the implementation of the approved contingency plan as required by OAC rule 3745-54-56(J)? [Condition B.23] Yes___ No N/A ___ RMK#___



INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

REMARKS

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CLOSURE REQUIREMENTS

- 1. Does the permittee maintain the approved closure plan at the facility? ~~{Condition B.29}~~ Yes ___ No N/A RMK# ___
- 2. Is the permittee keeping at the facility and submitting annually to Ohio EPA, the latest closure cost estimate as required by OAC rule 3745-55-42(D) ~~{Condition B.36}~~ Yes ___ No N/A RMK# ___
- 3. Has the permittee amended the closure plan? If so:
 - Yes ___ No N/A RMK# ___
 - a. Has the plan been amended in accordance with OAC rule 3745-55-18(D)? ~~{Condition B.28}~~ Yes ___ No N/A RMK# ___

NOTE: Also see Recordkeeping Requirements (Question #4) in order to verify that any changes to the closure plan were submitted in accordance with OAC rule 3745-50-51. * CERCLA SITE

- 4. Has the permittee closed the facility? If so:
 - Yes ___ No N/A ___ RMK# ___
 - a. Did the permittee complete closure of the facility 180 days after receiving the final volume of hazardous waste, as required by ~~Condition B.31~~ of the permit? Yes ___ No N/A ___ RMK# ___
 - b. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? ~~{Condition B.26}~~ Yes ___ No N/A ___ RMK# ___
 - c. Did the permittee carry out the approved closure plan as set found in Section ___ of the approved permit application? ~~{Condition B.27}~~ Yes ___ No N/A ___ RMK# ___
 - d. After receiving the final volume of hazardous waste, did the permittee remove all hazardous waste and complete closure activities in accordance with the schedule specified in the approved closure plan and as required by OAC rule 3745-55-13? ~~{Condition B.31}~~ Yes ___ No N/A ___ RMK# ___

e. Has the permittee decontaminated and/or disposed of all facility equipment, structures and soils as required by OAC rule 3745-55-14 and the approved closure plan? [~~Condition B.32~~]

Yes ___ No N/A | RMK# ___

f. Has the permittee certified that the facility has been closed in accordance with the specifications in the approved closure plan as required by OAC rule 3745-55-15? [~~Condition B.33~~]

Yes ___ No N/A | RMK# ___

g. Has the permittee submitted a survey plat to the director and local zoning authority no later than the submission of certification of closure of each hazardous waste disposal unit? [~~Condition B.34~~]

Yes ___ No N/A | RMK# ___



REMARKS

POST-CLOSURE MAINTENANCE

NOTE: Inspector may attach a post-closure maintenance inspection schedule. If so, the attached document is referenced as Appendix ____.

1. Has the permittee inspected the components, structures, and equipment at the site in accordance with the inspection schedule in § ____ of the permit application on a quarterly basis? [OAC rule 3745-55-17(A)(1)(b)] [Condition B.35]

Yes ___ No N/A | RMK# ___

2. Has the permittee conducted and recorded an inspection of at least the following? [Condition B.35]

Yes ___ No N/A | RMK# ___



- a. Security control devices (gates, locks, fences and signs);
- b. Erosion control;
- c. Cover settlement, subsidence and displacement;
- d. Vegetative cover conditions;
- e. Integrity of run-on/run-off control measures;
- f. Cover drainage system functioning;
- g. Monitor well conditions; and
- h. Benchmark integrity.

3. Is the permittee using the inspection forms found in the approved Part B permit application? [§____ of the approved permit application]

Yes___ No N/A ___ RMK#___

4. Have suitable repairs been made within a reasonable amount of time? [Condition B.35]

Yes___ No N/A ___ RMK#___

5. Have repairs been indicated on the Notification Repair Form? [Condition B.35]

Yes___ No N/A ___ RMK#___

6. Was the Notification of Repair Form submitted to Ohio EPA within one week after determining that repairs are necessary? [Condition B.35]

Yes___ No N/A ___ RMK#___



INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: *The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.*

REMARKS

STORAGE OF HAZARDOUS WASTES IN CONTAINERS

NOTE: *The requirements of Condition C do not apply to the permittee's activities as a generator accumulating hazardous waste for <90 days per OAC rule 3745-52-34(A). Please complete the applicable sections of the Generator Requirements checklist to document compliance with activities associated with <90 day accumulation of wastes.*

CONDITION OF CONTAINERS

1. Are containers holding hazardous wastes in good condition as required by OAC 3745-55-71? ~~[Condition G.4]~~ If not:

Yes No N/A RMK#

a. Did the permittee transfer the hazardous waste from such a container to one that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit? ~~[Condition G.4]~~

Yes No N/A RMK#

2. Does the permittee ensure that all containers used at the facility are compatible with the hazardous waste to be stored in them as required by OAC rule 3745-55-72? ~~[Condition G.5]~~

Yes No N/A RMK#

3. Does the permittee keep all containers closed during storage except when it is necessary to add or remove waste as required by OAC rule 3745-55-73? ~~[Condition G.6(a)]~~

Yes No N/A RMK#

4. Does the permittee store all containerized hazardous waste on the container storage containment system as described in ~~Condition G.7 of the permit?~~ ~~[Condition G.7]~~

Yes No N/A RMK#

PART B APPLICATION

INSPECTIONS

NOTE: Inspector may attach a container inspection checklist. If so, the attached document is referenced as Appendix _____.

5. Is the permittee inspecting the container area weekly in accordance with OAC rule 3745-55-74 and the approved inspection schedule in Section _____ of the Part B permit application to detect leaking containers and deterioration of containers and the containment system? ~~[Condition G.9]~~

Yes No N/A RMK#

a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken as required by OAC rule 3745-54-15(D)?

Yes No N/A RMK#

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CONTAINMENT SYSTEM

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6. Does the permittee maintain the containment system as described in the approved permit application, Section ____, including: ~~{Condition G.7}~~ Yes No N/A ____ RMK# ____
- a. Sufficient capacity to hold 10% of the total volume of containers or the volume of the largest container, whichever is greater. Yes No N/A ____ RMK# ____
- b. A system which is free of gaps and sufficiently impervious to contain leaks and spills? Yes No N/A ____ RMK# ____
7. Has the permittee had a spill or leak of wastes? If so: Yes ____ No N/A ____ RMK# ____
- a. Was spilled or leaked waste removed in a timely manner? ~~{Condition G.7(e)}~~ Yes ____ No N/A RMK# ____

NOTE: ~~This time period is not to exceed 24 hours. {Condition G.7(e)}~~

AISLE SPACE

8. Is the permittee maintaining adequate aisle space to allow unobstructed movement of personnel and equipment in the event of an emergency as required by OAC rule 3745-54-35 and Condition B.12 of the permit? Yes No N/A ____ RMK# ____

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

REMARKS

LAND DISPOSAL RESTRICTION REQUIREMENTS

NOTE: In order to determine compliance with all applicable LDR requirements the inspector may need to complete the separate LDR checklist:

* FEDERAL FACILITY WITH APPROVED STP

- 1. Does the permittee comply with all applicable regulations regarding land disposal prohibitions and restrictions as required by OAC Chapter 3745-270? Yes No N/A RMK# _____
- 2. Does the permittee comply with the notification and certification requirements of OAC rule 3745-270-07(A)? Yes No N/A RMK# _____
- 3. Does the permittee comply with the requirements of OAC rule 3745-270-03 and does not in any way dilute a restricted waste or treatment residue as a substitute for adequate treatment? Yes No N/A RMK# _____
- 4. Does the permittee retain supporting data used to determine if wastes managed at the facility are restricted from land disposal in the facility files as required by OAC rule 3745-270-07(A)(5)? Yes No N/A RMK# _____
- a. Are copies of all notices, certifications, demonstrations, waste analysis and other documentation produced pursuant to OAC Chapter 3745-270 retained for a period of three years as required by OAC rule 3745-270-07(A)? Yes No N/A RMK# _____
- 5. Is the permittee in compliance with the requirements of OAC rule 3745-270-50 regarding the storage of wastes restricted or prohibited from land disposal under OAC rule 3745-270-50? Yes No N/A RMK# _____

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

REMARKS

CORRECTIVE ACTION

1. Has the permittee submitted the monthly progress report for all corrective action activities? (This report is due by the 15th of the month following the reporting period.)
[Condition _____]

Yes ___ No N/A RMK# _____

2. Has the permittee identified any new WMUs or releases at the facility? [Condition E.10]? If so:

Yes ___ No N/A RMK# _____

a. Did the permittee follow the steps indicated in Conditions E.10(a) and (b) and E.11?

Yes ___ No N/A RMK# _____

INSPECTION ITEMS FROM THE PART B APPLICATION

NOTE: The inspector or permit writer may add inspection items based on the permittee's application, as appropriate.

REMARKS

Company: U.S. DOE-FEMP (FERNALD) EPA I.D.: OH 6 890008976

Street: _____ City: _____

County: _____ State: Ohio Zip: _____

Mailing Address: _____
(IF DIFFERENT FROM ABOVE)

Telephone: _____ Fax: _____

Owner/Operator: _____
(IF DIFFERENT FROM ABOVE)

Street: _____

City: _____ State: _____ Zip: _____

Inspection Date(s): 1/29/2004 Time(s): _____

Inspection announced? Yes _____ No _____ If so, how much advance notice given? _____

Name Affiliation Telephone

Inspectors: _____

Facility Rep(s): _____

USED OIL MANAGEMENT ACTIVITY

<input checked="" type="checkbox"/> Generator/Collection Center/Aggregation	<input type="checkbox"/> Marketer
<input type="checkbox"/> Transporter/Transfer Facility	<input type="checkbox"/> Off-Spec Burner
<input type="checkbox"/> Processor/Re-Refiner	<input type="checkbox"/> Other (specify)
<input type="checkbox"/> No Generation	

NOTE: This checklist does not include requirements for used oil transporters and transfer facilities, processors and re-refiners, burners, and marketers.

PROHIBITIONS

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1. Is used oil being managed in a surface impoundment or waste pile? If so:

Yes ___ No N/A ___ RMK# ___

Is the surface impoundment or waste pile being regulated under OAC 3745-54 to 3745-57 or 3745-65 to 3745-69? [3745-279-12(A)]

Yes ___ No N/A RMK# ___

2. Is used oil being used as a dust suppressant? [3745-279-12(B)]

Yes No N/A ___ RMK# ___

3. Is off-specification used oil fuel burned for energy recovery only in devices specified in 3745-279-12(C)?

Yes ___ No N/A RMK# ___

USED OIL GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil only as provided in 3745-279-10(B)? [2745-279-21(A)]

Yes No N/A RMK# ___

NO MIXING
TOX < 1,000

5. Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]

Yes No N/A RMK# ___

6. Does the generator only store used oil in tanks, containers or units subject to OAC 3745-54 to 3745-57 or 3745-65 to 3745-69? [3745-279-22(A)]

Yes No N/A ___ RMK# ___

7. Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]

Yes No N/A ___ RMK# ___

8. Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]

Yes No N/A ___ RMK# ___

9. Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]

a. Stopped the release?

Yes ___ No N/A RMK# ___

b. Contained the release?

Yes ___ No N/A RMK# ___

c. Cleaned up and properly managed the used oil and other materials?

Yes ___ No N/A RMK# ___

d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary?

Yes ___ No N/A RMK# ___

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10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so:

Yes ___ No N/A ___ RMK# **5359**

a. Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?

Yes ___ No N/A ___ RMK# ___

b. Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?

Yes ___ No N/A ___ RMK# ___

c. Are the combustion gases from heater vented to the ambient air?

Yes ___ No N/A ___ RMK# ___

11. Does the generator have the used oil hauled only by transporters that have obtained an EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24]

Yes No N/A ___ RMK# ___

USED OIL COLLECTION CENTERS AND AGGREGATION POINTS

12. Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]

Yes ___ No N/A ___ RMK# ___

13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]

Yes ___ No N/A ___ RMK# ___

14. Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]

Yes ___ No N/A ___ RMK# ___

WASTE EVALUATION

15. Have all wastes generated at the facility been evaluated? [3745-52-11]

Yes No N/A ___ RMK# ___

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REMARKS

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