WH 0461
6/10/92
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Facility: U.S. Department of Energy, Hanford

ID No. WA789000 8967

Date of Inspection: June 8 + 9, 1992
Date of Report: June 10, 1992

FILE COPY

Address: Hanford Reservation
Richland, Washington 99352

Report Prepared By: Jack Boller, Environmental Protection Specialist
Washington Operations Office
EPA Region 10

Jack Boller

Inspector: Jack Boller, EPA/WOO
Elizabeth McManus, EPA/WOO
Steve Moore, Ecology
Greta Davis, Ecology

Purpose:

This inspection was conducted to gather information on facility compliance with applicable regulations for management of hazardous waste under the Washington State and United States hazardous waste laws.

General Facility Process Information:

The Hanford Reservation is apporximately 570 square miles in area, located in Benton County, Richland, Washington. In early 1943, the U.S. Army Corps of Engineers selected the Handford site as the location for reactor, chemical separation, and related facilities and activities for the production and purification of plutonium. Activities at the site are centralized in numerically designated areas. The reactor facilities are located along the Columbia River in what are known as the 100 areas. The reactor fuel processing and waste management facilities are in the 200 Areas. The 300 Area contains the reactor fuel manufacturing areas and the research and development laboratories. The Fast Flux Test Facility is with maintenance and the nonradioactive danerous Waste Landfill is located in the 600 Area. Administrative buildings are located in the 700 Area in downtown Richland.

The reservation is owned and operated by the U.S. Department of Ecology (DOE) through its contractors of which Westinghouse Hanford Company (WHC) is the prime contractor. The other contractors at the reservation are: Pacific Northwest Laboratory (PNL); Habford Environmental Health Foundation (HEHF); and Kaiser Engineers Handford Company (KEH).

Early in 1989 DOE, Ecology, and ePA signed an agreement that set down a schedule for permitting, closure, and corrective action under both RCRA closures are being conducted. The facility is operating as an interim status land disposal facility.

Notification and Permits:

Inspection:

At 8:30 a.m. on June 9, 1992, Steve Moore and Greta Davis of Ecology, and Elizabeth McManus and I of EPA arrived at the offices of the Westinghouse Hanford Company (WHC). Mr. Moore went in and informed Tony Miskho that we were there to go into the reservation to conduct a RCRA inspection. Mr. Miskho agreed to meet us at the 616 building where we wished to begin our inspection. We left the WHC offices and proceeded to the 616 building on the DOE reservation.

The 616 building is the main hazardous waste storage unit for the reservation. We entered the building and were met by Tim Callaway and Craig Struwe, unit operators. We explained our purpose and asked to tour the unit.

As we toured the unit, Mr. Miskho arrived and accompanied us. We noted several drums of land disposal restricted waste had been in storage over one year. These drums as well as several others that had been there less than one year had labels identifying them as "moratorium wastes". We asked what this meant. It was explained that the Department of Energy had placed a moratorium on shipping waste off site that had been in radiation areas. The moratorium is to remain in effect until the facility has developed a plan to assure that hazardous waste generated in radiation zones is not contaminated by radiation. A plan has been prepared and the facility is awaiting DOE approval to begin shipping the waste off-site.

In addition to the moratorium waste we also noted five drums of F027 waste that had been in storage for as much as three years. It was explained that there was no off-site capacity for this waste and therefore the only option is for the facility to hold on to it.

Following the tour we conducted a file review. We looked at manifests for both incoming and outgoing shipments. Only copies of the manifests are kept at the 616 building. All manifests are generated at a different location and the originals as well as the LDR records are kept there. We looked at inspection logs and the operating record. They all appeared to be in order. We asked to see training records and they were provided. As we were reviewing them, Mr. Miskho stated that if we wanted copies of them we would have to file a FOIA request. He further stated that he wasn't sure that we were allowed to look at the training records. He called his office and was informed that the company policy was to require a FOIA request to even look at the records. I informed him that we would regard this denial of access. I called Andy Boyd of our ORC and informed him of the situation.

We went from here to the 183-H evaporation ponds at the north end of the facility. Enroute we noticed a construction trailer with a few drums setting in front of it. The drums appeared to have hazardous waste labels on them so we decided to return later to take a closer look. At the ponds closure work is progressing. All residues have been removed and taken to the central waste complex for storage. Samples have been taken of the concrete lining the ponds. Final disposition of the concrete will depend on the analytical results.

From here we went to the offices where manifests are stored. When we arrived at the office we were introduced to Mike Ramsos who manages waste shipment into and out of the 616 unit. He explained the system for generating and storing manifests. After reviewing a few manifests and LDR notifications we broke for lunch.

Following lunch we toured the reservation by car to familiarize the EPA inspectors with the current status of operations. During this tour we passed the construction trailer we had seen in the morning and noticed that the drum was no longer in front of the trailer. This concerned us since we had told Mr. Miskho that we wished to visit this area and he agreed to arrange to have representatives of the Kaiser Engineering group meet us there in the morning. We concluded this tour and returned to town at 5:00 p.m.

On June 10 at 9:00 a.m. we arrived at the construction trailer we had seen the previous day. We were met by Mr. Bodily of Kaiser Engineers and Steve Szendre of WHC. Mr. Bodily explained that this area was a lay down and staging area for Bill Lewis Construction who had subcontracted to do some painting for Kaiser. The drums we saw were a satellite accumulation area for solvents and paint wastes. They had been moved from in front of the trailer to behind the trailer. The drums were not in a secure area and were not under control of the operator.

From here we moved next door to the Batch Plant less than 90 day accumulation area. Along with a less than 90 day area there were five satellite accumulation areas inside the unit. The area was surrounded by a locked fence and appeared to be secure.

We next stopped at the fire station across the road from the 616 building. We inquired about the contingency plan for 616 and about fire training. A copy of the contingency plan is in the HazMat vehicle and on file in the station's office. No fires are used in training and the old fire extinguisher training area has been cleaned up and discontinued.

From the fire station we moved to the 300 area. After clearing security we met R.W. Brown and went to look at the 300 process trenches. Waste water from various operations in the 300 area are discharged to the ditches from a settling basin. The water is allowed to percolate into the soil. A monitoring unit continuously monitors pH and conductivity of the water in the basin. It also continuously samples the water. The samples are analyzed twice a month. Mr Moore noted that the sample was being collected in a large wide mouth jar that was open. Over a two week period a large amount of evaporation would occur thus giving a high bias to analytical results.

We next stopped at the 306E building storage pad. The unit was locked and while we waited for a key we looked at containers of state only waste being held in the old coal yard. This waste was awaiting the signing of a new waste contractor. The contract is now in place and the waste is all scheduled to be shipped by the end of the month. Mr. Fred Nunamaker came with a key and opened the accumulation units. One of the units is used as a satellite area for waste generated in the building almost 100 yards away.

We asserted that this did not meet the "at or near" provision for satellite accumulation.

We went inside to look at records. Mr. Moore was trying to determine if regulated waste is discharged to the ditches. It is not clear from the data seen thus far. We again asked to see training records and asked for copies of training records for Tim Callaway and Craig Struwe of the 616 building and for Fred Nunamaker and the Kaiser person in charge of the Batch Plant accumulation area. Mr. Szendre said that he was required by company policy of WHC to deny our request and to inform us that a FOIA request was required to view or obtain such records. We documented this as a denial of access.

After reviewing our observations with Mr. Szendre we ended our inspection and left the facility at 2:30 p.m.

Conclusion:

The following concerns were noted:

1. Denial of access to training records;

2. Satellite areas that are not under the control of the operator or at or near the point of generation;

3. LDR waste in storage over one year; and

4. Possible discharge of regulated waste to the 300 ditches.

EXHIBIT IV-1

GENERAL SITE INSPECTION INFORMATION FORM

Hanford Reservation
A. Site Name B. Street (or other identifier)

Richland Wa 99352
C. City D. State E. Zip Code F. County Name

G. Site Operator Information

1. Name US Dept. of Energy 2. Telephone Number

3. Street 4. City Richland 5. State Wa. 6. Zip Code 99352

H. Site Description

Nuclear energy Production + Waste management facility.

I. Type of Ownership

X 1. Federal __2. State __3. County __4. Municipal __5. Private

J.

X 1. Generator __2. Transporter X 3. Treatment X 4. Storage X 5. Disposal

K. Regulatory Status

X 1. Interim Status X 3. Part B Permit Application Submitted

__2. Permitted Facility X 4. Part B Permit Application in Preparation

L.

1. Principal Inspector Name Jack Boller
2. Title EPS
3. Organization EPA R10/WOO
4. Telephone No. (area code and No.) (206)753-9428

M. Inspection Participants

1. Elizabeth McManus, EPA 6.
2. Steve Moore, Ecology 7.
3. Greta Davis, Ecology 8.
4. 9.
5. 10.

EXHIBIT IV-2

GENERAL FACILITY CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.? X Yes __ No

   a. If yes, EPA I.D. No. WA7890089967
      If no, explain. _____

2. Has facility received hazardous waste from a foreign source? __ Yes X No

   a. If yes, has it filed a notice with the Regional Administrator? ~~__ Yes __ No~~

Waste Analysis

3. Does facility maintain a copy of the waste analysis plan at the facility? X Yes __ No

   a. If yes, does it include:

      1. Parameters for which each waste will be analyzed? X Yes __ No
      2. Test methods used to test for these parameters? X Yes __ No
      3. Sampling method used to obtain sample? X Yes __ No
      4. Frequency with which the initial analyses will be reviewed or repeated? X Yes __ No
      5. (For offsite facilities) waste analyses that generators have agreed to supply? X Yes __ No
      6. (For offsite facilities) procedures which are used to inspect and analyze each movement of hazardous waste, including:

         a. Procedures to be used to determine the identity of each movement of waste. X Yes __ No
         b. Sampling method to be used to obtain representative sample of the waste to be identified. X Yes __ No

4. Does the facility provide adequate security through:

   a. 24-hour surveillance system (e.g., television monitoring or guards)? X Yes __ No

      OR

(continued)

EXHIBIT IV-2 (continued)

b. 1. Artificial or natural barrier around facility (e.g., fence or fence and cliff)? X Yes __ No

Describe _____

AND

2. Means to control entry through entrances (e.g., attendant, television monitors, locked entrance, controlled roadway access)? X Yes __ No

Describe _____

General Inspection Requirements

5. Does the owner/operator maintain a written schedule at the facility for inspecting:

a. Monitoring equipment? X Yes __ No
b. Safety and emergency equipment? X Yes __ No
c. Security devices: X Yes __ No
d. Operating and structural equipment? X Yes __ No
e. Types of problems of equipment:

1. Malfunction X Yes __ No
2. Operator error X Yes __ No
3. Discharges X Yes __ No

6. Does the owner/operator maintain an inspection log? X Yes __ No

a. If yes, does it include:

1. Date and time of inspection? X Yes __ No
2. Name of inspector? X Yes __ No
3. Notation of observations? X Yes __ No
4. Date and nature of repairs or remedial action? X Yes __ No

b. Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet.) __ Yes X No

Personnel Training

7. Does the owner/operator maintain personnel training records at the facility? X Yes __ No

(continued)

How long are they kept? Not allowed access without a FOIA request

a. If yes, do they include:

1. Job title and written job description of each position? __Yes __No
2. Description of type and amount of training? __Yes __No
3. Records of training given to facility personnel? __Yes __No

Requirements for Ignitable, Reactive, or Incompatible Waste

8. Does facility handle ignitable or reactive wastes? X Yes __No

a. If yes, is waste separated and confined from sources of ignition or reaction (open flames, smoking, cutting and welding, hot surfaces, frictional heat), sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat?

1. If yes, use narrative explanation sheet to describe separation and confinement procedures.
2. If no, use narrative explanation sheet to describe sources of ignition or reaction.

b. Are smoking and open flame confined to specifically designated locations? X Yes __No

c. Are "No Smoking" signs posted in hazardous areas? X Yes __No

d. Are precautions documented (Part 264 only)? ~~__Yes __No~~

9. Check containers

a. Are containers leaking or corroding? __Yes X No

b. Is there evidence of heat generation from incompatible wastes? __Yes X No

Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion, or contamination of the environment? X Yes __No

If yes, use narrative explanation sheet to explain.

(continued) Documentation on file.

EXHIBIT IV-2 (continued)

2. Is the facility equipped with:

a. Internal communication or alarm system? X Yes __ No

1. Is it easily accessible in case of emergency? X Yes __ No

b. Telephone or two-way radio to call emergency response personnel? X Yes __ No

c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? X Yes __ No

d. Water of adequate volume for hoses, sprinklers, or water spray system? X Yes __ No

1. Describe source of water USDOE maintains police + fire dept.

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? X Yes __ No

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) X Yes __ No

5. In the case that more than one police or fire department might respond, is there a designated primary authority? __ Yes __ No

a. If yes, name primary authority _____

6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors, and equipment suppliers? X Yes __ No

a. Are they readily available to all personnel? X Yes __ No

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or relesses at the facility? X Yes __ No

8. If State or local authorities decline to enter, is this entered in the operating record? X Yes __ No

(continued)

EXHIBIT IV-2 (continued)

Section C - Contingency Plan and Emergency Procedures

1. Is a contingency plan maintained at the facility? X Yes __No

   a. If yes, is it a revised SPCC Plan? X Yes __No

   b. Does contingency plan include:

      1. Arrangements with local emergency response organizations? X Yes __No
      2. Emergency coordinators' names, phone numbers, and addresses? X Yes __No
      3. List of all emergency equipment at facility and descriptions of equipment? X Yes __No
      4. Evacuation plan for facility personnel? X Yes __No

2. Is there an emergency coordinator on site or on call at all times? X Yes __No

Section D - Manifest System, Recordkeeping, and Reporting

1. Does facility receive waste from offsite? __Yes X No

   a. If yes, does the owner/operator retain copies of all manifests? __Yes __No

      1. Are the manifests signed and dated and returned to the generator? __Yes __No
      2. Is a signed copy given to the transporter? __Yes __No

2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? __Yes X No

   a. If yes, is it accompanied by a shipping paper? __Yes __No

      1. Does the owner/operator sign and date the shipping paper and return a copy to the generator? __Yes __No
      2. Is a signed copy given to the transporter? __Yes __No

3. Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)? __Yes X No

   a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter? __Yes __No

      1. If no, has Regional Administrator been notified? __Yes __No

(continued)

EXHIBIT IV-2 (continued)

4. Does the owner/operator keep a written operating record at the facility? X Yes __No

   a. If yes, does it include:

      1. Description and quantity of each hazardous waste received? X Yes __No
      2. Methods and dates of treatment, storage, and disposal? X Yes __No
      3. Location and quantity of each hazardous waste at each location? X Yes __No
      4. Cross-references to manifests/shipping papers? X Yes __No
      5. Records and results of waste analyses? X Yes __No
      6. Report of incidents involving implementation of the contingency plan? X Yes __No
      7. Records and results of required inspections? X Yes __No
      8. Monitoring or testing analytical data (Part 264)? X Yes __No
      9. Closure cost estimates and, for disposal facilities, post-closure cost estimates (Part 264)? X Yes __No
      10. Notices of generators as specified in §264.12(b) (Part 264)? X Yes __No

5. Does the facility submit a biennial report by March 1 every even-numbered year? X Yes __No

   a. If yes, do reports contain the following information:

      1. EPA I.D. number? X Yes __No
      2. Date and year covered by report? X Yes __No
      3. Description/quantity of hazardous waste? X Yes __No
      4. Treatment, storage, and disposal methods? X Yes __No
      5. Monitoring data under §265.94(a)(2) and (b)(2) (Part 265)? X Yes __No
      6. Most recent closure and post-closure cost estimates? X Yes __No
      7. For TSD generators, description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year? X Yes __No
      8. Certification signed by owner/operator? X Yes __No

6. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? ~~__Yes __No~~

   a. If yes, has he submitted an unmanifested waste report to the Regional Administrator? ~~__Yes __No~~

7. Does the facility submit to the Regional Administrator reports on releases, fires, and explosions; contamination and monitoring data; and facility closure? X Yes __No

EXHIBIT IV-4

GENERATOR'S CHECKLIST

Section A - EPA Identification No.

1. Does generator have EPA I.D. No? X Yes __No

   a. If yes, EPA I.D. No. WA789000 8967

Section B - Manifest

1. Does generator ship waste offsite? X Yes __No

   a. If no, do not fill out Sections B and D.

   b. If yes, identify primary offsite facility(s). Use narrative explanation sheet.

2. Does generator use manifest? X Yes __No

   a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month)? ~~__Yes __No~~

      1. If yes, does generator indicate this when sending waste to a TSD facility? ~~__Yes __No~~

   b. If yes, does manifest include the following information?

      1. Manifest document No. X Yes __No
      2. Generator's name, mailing address, telephone No. X Yes __No
      3. Generator EPA I.D. No. X Yes __No
      4. Transporter Name(s) and EPA I.D. No.(s) X Yes __No
      5. a. Facility name, address, and EPA I.D. No. X Yes __No
         b. Alternate facility name, address, and EPA I.D. No. X Yes __No
         c. Instructions to return to generator if undeliverable X Yes __No
      6. Waste information required by DOE - shipping name, quantity (weight or vol.), containers (type and number) X Yes __No

(continued)

EXHIBIT IV-4 (continued)

7. Emergency information (optional) (special handling instructions, telephone No.) X Yes __ No

8. Is the following certification on each manifest form? X Yes __ No

   This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

9. Does generator retain copies of manifests? X Yes __ No

If yes, complete a through e.

a. 1. Did generator sign and date all manifests? X Yes __ No
   2. Who signed for generator?

   Name _____ Title _____

b. 1. Did generator obtain handwritten signature and date of acceptance from initial transporter? X Yes __ No
   2. Who signed and dated for transporter?

   Name _____ Title _____

c. Does generator retain one copy of manifest signed by generator and transporter? X Yes __ No

d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? X Yes __ No

e. Does generator retain copies for 5 years? X Yes __ No

Section C - Hazardous Waste Determination

1. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)? X Yes __ No

   a. If yes, list waste and quantities (include EPA Hazardous Waste No.) _____

(continued)

EXHIBIT IV-4 (continued)

2. Does generator generate solid waste(s) listed in Subpart C that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) X Yes __No

   a. If yes, list wastes and quantities (include EPA Hazardous Waste No.) See part A

   b. Does generator determine characteristics by testing or by applying knowledge of processes? _____

      1. If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)? X Yes __No

         a. If equivalent test methods used, attach copy of equivalent methods used.

3. Are there any other solid wastes generated by generators? X Yes __No

   a. If yes, did generator test all wastes to determine nonhazardous characteristics? X Yes __No

      1. If no, list wastes and quantities deemed nonhazardous or processes from which nonhazardous waste was produced (use additional sheet if necessary).

_____

_____

_____

Section D - Pretransport Requirements

1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? X Yes __No

2. a. Are containers to be shipped leaking or corroding? __Yes X No

   b. Use sheet to describe containers and condition.

   c. Is there evidence of heat generation from incompatible wastes in the containers? __Yes X No

3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172? X Yes __No

4. Does generator mark each package in accordance with 49 CFR 172? X Yes __No

(continued)

EXHIBIT IV-4 (continued)

5. Is each container of 110 gallons or less marked with the following label? X Yes __ No

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest policy or public safety authority or the U.S. Environmental Protection Agency.

Generator name(s) and address(es) _____

_____

Manifest document No. _____ _____

6. Does generator have placards to offer to transporters? X Yes __ No

7. Accumulation time

a. Are containers used to temporarily store waste before transport? X Yes __ No

1. If yes, is each container clearly dated: Also, fill out rest of No. 7 (accum. time) X Yes __ No

b. 1. Does generator inspect containers for leakage or corrosion? (265.174 - Inspections) X Yes __ No

2. If yes, with what frequency? daily

c. Does generator locate containers holding ignitable or reactive waste at least 15 meters (50 feet) from the facility's property line? (265.176 - Special Requirements for Ignitable or Reactive Wastes) X Yes __ No

NOTE: If tanks are used, fill out checklist for tanks.

d. Are the containers labeled and marked in accordance with Section D-3, -4, and -5 of this form? X Yes __ No

NOTE: If generator accumulates waste on site, fill out checklist for General Facilities, Subparts C and D.

e. Does generator comply with requirements for personnel training? (Attach checklist for 265.16 - Personnel Training.) X Yes __ No

8. Describe storage area. Use photos and narrative explanation sheet.

(continued)

EXHIBIT IV-4 (continued)

Section E - Recordkeeping and Records

1. Does generator keep the following reports for 5 years?

   a. Manifests and signed copies from designated facilities X Yes __No
   b. Annual reports X Yes __No
   c. Exception reports X Yes __No
   d. Test results X Yes __No

2. Where are the records kept (at facility or elsewhere)? _____

3. Who is in charge of keeping the records?

   Name _____ Title _____

Section F - Special Conditions

1. Has generator received from or transported to a foreign source any hazardous waste? __Yes X No

   a. If yes, has he filed a notice with the Regional Administrator? __Yes __No
   b. Is this waste manifested and signed by a foreign cosignee? __Yes __No
   c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? __Yes __No

EXHIBIT IV-6

CONTAINERS CHECKLIST

Section A - Use and Management

1. Are containers in good condition? X Yes __ No

Section B - Compatibility of Waste With Container

1. Is container made of a material that will not react with the waste which it stores? X Yes __ No

Section C - Management of Containers

1. Is container always closed while holding hazardous waste? X Yes __ No

2. Is container handled so that it will not be opened, handled, or stored in a manner which may rupture it or cause it to leak? X Yes __ No

Section D - Inspections

1. Does owner/operator inspect containers at least weekly for leaks and deterioration? X Yes __ No

Section E - Containment (Part 264)

1. Do container storage areas have a containment system? X Yes __ No

Section F - Ignitable and Reactive Waste

1. Are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property lines? X Yes __ No

Section G - Incompatible Waste

1. Are incompatible wastes or materials placed in the same containers? __ Yes X No

2. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste? X Yes __ No

(continued)

EXHIBIT IV-6 (continued)

3. Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device? X Yes __ No

Section H - Closure (Part 264)

1. At closure, were all hazardous wastes and associated residues removed from the containment system? ~~__ Yes __ No~~

Land Disposal Restriction Inspection Checklist

I. Generator Requirements

	Yes	No
A. Did the generator completely designate waste for all applicable waste codes?	X	
B. Did the generator properly designate waste as wastewater or nonwastewater?	X	
C. Did the generator properly identify treatment standards for all waste streams?	X	
D. Did the generator's waste meet the treatment standards as generated?	Some	did
1. If the waste met the standard:		
a. Did the generator send a certification with each offsite shipment of waste?	X	
b. Did the certification contain:		
1. The faclity EPA ID number,	X	
2. The manifest number for the shipment,	X	
3. Waste codes,	X	
4. Treatment standards for F001, F002,F003,F004,F005,F039 and California list wastes or reference specific standards in 40CFR Part 268 for all other wastes,	X	
5. Waste analysis data,	X	
6. Certification language specified in 40CFR Part 268.7(a)(2)(i) and the generator's signature?	X	
2. If the waste did not meet the standard:		
a. Did the generator treat the waste onsite? (If no go to g.)	X	
b. Did the generator have and follow a waste analysis plan?	X	
c. If the treated waste met the treatment standards was a certification sent with each offsite shipment?	X	
d. Did the certification contain:		
1. The faclity EPA ID number,	X	
2. The manifest number for the shipment,	X	
3. Waste codes,	X	

	Yes	No
4. Treatment standards for F001, F002,F003,F004,F005,F039 and California list wastes or reference specific standards in 40CFR Part 268 for all other wastes,	X	
5. Waste analysis data,	X	
6. Certification language specified in 40CFR Part 268.7(a)(2)(i) and the generator's signature?	X	
e. If the treated waste did not meet the treatment standards was a LDR notification sent with each offsite shipment?	X	
f. Did the notification contain:		
1. The faclity EPA ID number,	X	
2. The manifest number for the shipment,	X	
3. Waste codes,	X	
4. Treatment standards for F001, F002,F003,F004,F005,F039 and California list wastes or reference specific standards in 40CFR Part 268 for all other wastes,	X	
5. Waste analysis data.	X	
g. If the generator did not treat the waste onsite did the generator send waste offsite that did not meet the treatment standards?	X	
h. For waste sent offsite did the generator send a LDR notification with each shipment sent offsite?	X	
i. Did the notification contain:		
1. The faclity EPA ID number,	X	
2. The manifest number for the shipment,	X	
3. Waste codes,	X	
4. Treatment standards for F001, F002,F003,F004,F005,F039 and California list wastes or reference specific standards in 40CFR Part 268 for all other wastes,	X	
5. Waste analysis data.	X	
E. Did the generator keep a copy of all LDR notifications and certifications on site for at least five years?	X	

	Yes	No
F. Is the generator treating waste in a surface impoundment?	___	X
1. If yes:		
a. Are sampling and analysis methods specified in the waste analysis plan to include sludge and supernatant separately?	___	___
1. Are test results kept on file?	___	___
b. Does the impoundment meet the design requirements of 40CFR 265.221(a) or 40CFR 264.221(c) and the groundwater monitoring requirements of subpart F of 40 CFR 264 or 265?	___	___
c. Are treatment residues removed at least annually and managed in accordance with all applicable regulations?	___	___
G. Is the generator using impermissable dilution of waste to avoid regulation? If so describe:	___	X
H. Has the generator received from the administrator a case by case extension to the effective date of the LDR requirements? If so describe:	___	X
I. Does the generator land dispose onsite? If so describe:	___	X

	Yes	No
J. Has the generator been allowed to land dispose restricted waste based on a no migration petition approval by EPA? If so describe:	___	X
K. Does the generator land dispose in a subtitle D facility characteristic waste which has been treated to be deemed no longer hazardous waste?	___	X
1. If so:		
a. Has the generator sent EPA a notification of this activity and cerification of the status of the waste?	___	___
b. Do they contain:		
1. The name and address of the subtitle D facility?	___	___
2. A description of the waste as originally generated including EPA waste codes and treatability groups?	___	___
3. The treatment standards applicable to the original waste?	___	___
4. A signed certification with language found in 40CFR 268.7(b)(5)(i)?	___	___

II. TSD Facility Requirements

	Yes	No
A. Does the facility have a waste analysis plan that was updated to address LDR requirements?	X	
B. Does the waste analysis plan address the following LDR waste categories?		
1. F001-F005 Spent Solvents,	X	
2. F020-F028 Dioxons,	X	
3. California List Wastes,	X	
4. First, Second, and Third Third Waste	X	
5. Residues from all treatment processes.	X	
C. Are wastes with treatment standards listed in 40 CFR 268.41 analyzed using TCLP?	X	
D. Are wastes with treatment standards listed in 40 CFR 268.43 analyzed using total constituent analysis?	X	
E. Does the facility maintain the following records for at least 5 years?		
1. Waste analysis results,	X	
2. LDR notifications and certifications for waste received and for waste generated,	X	
3. Information required by notification or certification for LDR waste generated and managed wholly onsite.	X	
F. Are LDR wastes stored onsite in containers? If no go to I.	X	
G. Are all containers clearly marked to identify the contents and date entering storage?	X	
H. Have wastes been stored for more than one year?	X	
1. Can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?	X	
I. Are LDR wastes stored on site in tanks? If no go to M.		X
J. Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and the date each period of accumulation began, or is such information in the facility operating record?		

	Yes	No
K. Have LDR waste tanks been emptied at least once per year?		
L. Can the facility show that tank accumulation over one year is necessary to facilitate proper recovery, treatment, or disposal?		
M. Does the facility treat LDR wastes other than in surface impoundments?	X	
N. Are required technologies used to treat wastes which have treatment technologies specified in 40 CFR 268.42?	X	
1. If not was an alternative method submitted for approval?		
O. Does the facility manage lab packs?	X	
If so:		
1. Are they managed to meet specified treatment standards, or	X	
2. Do they qualify for land disposal by meeting the requirements in 40 CFR 268.42(c)?	X	
P. Does the facility manage any characteristic wastes for which the LDR treatment standard is lower than the waste designation level?		X
1. If yes does the facility manage the waste as restricted until treatment standards are met even after the waste is rendered non-hazardous?		
Q. Does the facility use dilution as a substitute for treatment?		X
R. Does the facility ship any characteristic wastes which have been rendered non-hazardous to solid waste facility?		X
1. Are a notification and certification for each shipment sent to EPA or Ecology?		
S. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?	X	
1. Are a notification and certification provided to the receiving facility with each shipment?	X	

both

	Yes	No
T. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?	X	
1. Are the appropriate notification and certification being provided to the receiving facility with each shipment?	X	
U. Surface Impoundments		
1. Are restricted wastes placed in surface impoundments for treatment? If no go to V.		X
2. Are evaporation or dilution the only treatment occurring in the impoundment?		
3. Has the facility submitted a waste analysis plan and certification of compliance with minimum technology requirements and ground water monitoring requirements for the impoundment?		
4. Is the sludge and supernatant from the impoundment sampled and analyzed in accordance with the waste analysis plan?		
5. Are results of this analysis kept on file for at least 5 years?		
6. Do treatment residues exceed treatment standards?		
a. If so are they removed on an annual basis?		
V. Land Disposal		
1. Are LDR wastes placed in land disposal units (i.e.;landfills, surface impoundments, waste piles, land treatment units, salt domes/beds/mines/caves,etc.)?		X
a. If yes describe the units.		
2. Does the facility, prior to disposal, sample and analyze all waste to be disposed to assure that it meets treatment standards and is not a characteristic waste?	X	

	Yes	No
3. Are results of this analysis kept on file for at least 5 years?	X	

	Yes	No
4. Does the facility dispose of LDR waste under a National Capacity Variance, Case-By-Case Extension, No-Migration Petition, or a Treatment Variance? a. If so explain.		X

5. Are LDR wastes being placed in underground injection wells?		X