RCRA SITE INSPECTION

SITE: GE ROME
BREAK: 20.4
OTHER:

GAXXGXSX-201-001

10090643

1. Inspector and Author of Report

Gregory D. Fraley

2. Facility Information

General Electric Company
GAD 003 308 145
1935 Redmond Circle
Rome, Georgia 30161

3. Responsible Official

Richard Lester, Environmental Engineer

4. Date and Time of Inspection

March 27, 1988
10:00 a.m.

5. Inspection Participants

Richard Lester, General Electric Company
Gwendolyn Glass, Georgia Environmental Protection Division

6. Applicable Regulations

40 CFR, Parts 262 and 265

7. Purpose of Survey

To observe the State inspector's performance in conducting a RCRA inspection to determine a facility's compliance with all applicable regulations.

8. Facility Description

This General Electric facility has manufactured medium full capacity transformers since 1954. Until 1976, the primary dielectric fluid at the plant was oil containers polychlorinated biphenyls (PCB's). Currently (although some transformers are dry) the dielectric fluids are freon, mineral oil, and silicon fluid.

This facility also operates a Hazardous Waste Storage Facility and a Polychlorinated Biphenyl Management Facility. The RCRA storage facility manages flammable wastes, oils and paint thinners, and caustic wastes from paint removers. The PCB waste management activities result from the treatment of PCB contaminated groundwater by physical-chemical means and from storage and packaging of PCB contaminated materials generated from the treatment of contaminated groundwater.

The RCRA waste is managed inside a prefabricated steel building. The building has concrete floors which are pitched to prevent rainfall from entering and to prevent wastes from escaping the building.

The maximum quantity of RCRA waste in storage is 1500 drums of caustic material and 150 drums of flammable wastes. These wastes are stored separately within the same structure.

The wastes are stored separately within the same structure.

9. Findings

This facility was in compliance with all applicable regulations.

10. Conclusions

None.

11. Recommended Enforcement Action

None.

12. Signed

Gregory Fraley, Inspector

4/16/87
Date

13. Concurrence

John C. Lank, P.E., Chief
East Compliance Unit

4/25/87
Date

Approval

Allan E. Antly, Chief
Waste Compliance Section

4/28/87
Date

Attachment D

GEORGIA DEPARTMENT OF NATURAL RESOURCES
Environmental Protection Division
47 Trinity Avenue, S.W.
Atlanta, Georgia 30334

LAND PROTECTION BRANCH
Industrial & Hazardous Waste
Management Program
(404) 656-2833

GENERATOR STANDARDS INSPECTION CHECKLIST

SECTION I. FACILITY INFORMATION

SIC _____ TSDF? X (Yes) ___ (No) Transp? ___ (Yes) X (No) INSPECTION DATE: 3/27/87

General Electric Co. GAD003308145 Floyd
Facility Name I.D. No. County

1935 Redmond Circle Rome 30161 404 291 3988
Mailing Address City Zip Telephone Number

General Electric Gregory D. Fuller
Name of Owner/Operator Inspector's Signature

SECTION II. INSPECTION SUMMARY & REVIEW

Reason for Inspection: _____ Routine _____ Other OVERVIEW

Discussed with:

Name: Richard Lester Title: Env. Engineer

Address: _____ Telephone: _____

Copy of this report submitted to:

Name: _____ Title: _____

Address: _____ Telephone: _____

Photographs: ___ yes X no: No. _____

Samples collected: ___ yes X no: No. _____ Split ___ yes ___ no

Summary of Findings:

Facility is in compliance.

Reviewed by: _____ Review date: _____

Attachments:

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SECTION III. GENERATOR CHECKLIST

	MEETS REQUIREMENTS Yes	No	N/A
1. Facility notified as a generator and has obtained an EPA ID #? (262.12)	✓		
2. Facility has identified all wastes as hazardous or non-hazardous? (262.11)	✓	✓	
3. Facility stores waste in containers for less than 90 days (262.34) (265 Subpart I)	✓		
(a) drums in good condition, no leaks,	✓		
(b) compatible with waste?	✓		
(c) drums kept closed during storage	✓		
(d) drums inspected weekly	✓		
(e) ignitable or reactive wastes stored ≥ 50 ft. from property line?	✓		
(f) wastes separated from imcompatible wastes by dike or berm?	✓		
(g) date of accumulation period clearly marked on each container.			
4. Facility stores wastes in tanks for less than 90 days (262.34) (265.17 and 265, Subpart J)			
(a) Are ignitable or reactive wastes separated from sources of ignition?			
(b) Are wastes handled so as to prevent rupture, leaks, etc.			
(c) If tank is uncovered is there ≥ 2 feet freeboard or a containment structure?			
(d) If continuous feed is there a means to stop inflow?			
(e) Is discharge control equipment, monitoring equipment, tank level inspected daily?			
(f) Is tank construction and any discharge confinement structure inspected weekly?			
(g) Ignitable or reactive wastes treated, rendered, or mixed to be non-ignitable or non-reactive <u>or</u> protected from ignition or reaction <u>or</u> tank used only for emergencies?			
(h) Covered tanks storing ignitable or reactive wastes comply with buffer zone requirements.			
(i) Facility does not store incompatible wastes in same tank?			

	Yes	No	N/A
5. Wastes are manifested properly? (262.20)	✓		
6. Each container/tank is marked "Hazardous Waste" during accumulation. (262.34)	✓		
7. Wastes are labelled, marked "Hazardous Waste" (49 CFR 172.304) and placards offered to transporter prior to transport? (262.30)	✓		
8. Facility is operated and maintained to minimize possibility of fire, explosion, or release of hazardous waste to the environment. (262.31)	✓		
9. Facility has the following equipment to deal with hazards posed by waste handled: (265.32)			
(a) alarm system	✓		
(b) telephone or 2-way radio	✓		
(c) fire extinguishers	✓		
(d) water	✓		
10. Facility tests and maintains above equipment as necessary. (265.33)	✓		
11. Personnel have immediate access to emergency equipment. (265.34)	✓		
12. Adequate aisle space maintained. (265.35)	✓		
13. Arrangements with local authorities have been made to familiarize them with facility, designated response authority, etc. (265.37)	✓		
14. Contingency plan written (265.51). If yes: contingency plan includes (265.51)	✓		
(a) facility personnel action responses	✓		
(b) describes local authorities agreements	✓		
(c) lists names, addresses, phone #'s of emergency coordinators, designates primary emergency coordinator, and lists others in order of assumption of responsibility.	✓		
(d) lists all emergency equipment at the facility, location, physical description and capabilities.	✓		
(e) includes an evacuation plan for facility personnel.	✓		
(f) copies of contingency plan submitted to police, fire department, hospital, local emergency response teams.	✓		
(g) contingency plan amended when necessary.	✓		
(h) at least one emergency coordinator is on facility premises or on call.	✓		

	Yes	No	N/A
15. Emergency coordinator responds immediately to emergencies. (265.56)	✓		
16. Facility has a personnel training program of classroom instruction or OJT? (265.16). If so:	✓		
(a) Training is directed by person trained in hazardous waste management procedures	✓		
(b) Personnel complete training within 6 months of employment or assignment.	✓		
(c) Personnel take part in annual review of training.	✓		
(d) The following documents are maintained:	✓		
1. job title and name of employee	✓		
2. job description	✓		
3. amount and type of initial and continuing training to be given each person filling a position	✓		
4. documentation of training as job experience given to and completed by personnel	✓		
5. records kept until closure or 3 years past employment of individual personnel.			
17. Manifest records are kept for 3 years (262.40)	✓		
18. Annual reports submitted (262.41)	✓		
19. Exceptions reports submitted (262.42)	✓		
20. Are wastes exported or imported? (262.50) If yes, refer to 262.50 for a list of requirements.		✓	

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Environmental Protection Division
47 Trinity Avenue, S.W.
Atlanta, Georgia 30334

LAND PROTECTION BRANCH
Industrial & Hazardous Waste
Management Program
(404) 656-2833

TRANSPORTER STANDARDS INSPECTION CHECKLIST

SECTION I. FACILITY INFORMATION

SIC _____ TSDF? ___ Yes ___ No GEN? ___ Yes ___ No INSPECTION DATE: _____

Facility Name _____ I.D. No. _____ County _____

Mailing Address _____ City _____ Zip _____ Telephone Number _____

Name of Owner/Operator _____ Inspector's Signature _____

SECTION II. INSPECTION SUMMARY & REVIEW

Reason for Inspection: _____ Routine _____ Other _____

Discussed with:

Name: _____ Title: _____

Address: _____ Telephone: _____

Copy of this report submitted to:

Name: _____ Title: _____

Address: _____ Telephone: _____

Photographs: ___ yes ___ no: No. _____

Samples collected: ___ yes ___ no No. _____ Split ___ yes ___ no

Summary of Findings:

Reviewed by: _____ Review date: _____

Attachments:

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SECTION III. STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE

	Meets Requirement		
	Yes	No	N/A
1. Has the facility obtained an EPA I.D. No?			
2. Is all of the hazardous waste accepted for transportation accompanied by a manifest?			
3. Is the facility one of the following:			
(a) water (bulk) transporter			
(b) initial rail transporter accepting hazardous waste from a non-rail transporter			
(c) final rail transporter delivering hazardous waste to a designated facility			
(d) rail transporter delivering waste to a non-rail transporter			
If yes, only the following are applicable for compliance with the manifest system and recordkeeping:			
1. Did the transporter obtain the date of delivery and the handwritten signature of the owner/operator of the designated facility on the manifest or shipping paper?			
2. Does the facility have a recordkeeping system for manifests with a three-year retention time?			
4. Are the handwritten signature of the transporter and date of acceptance of the hazardous waste from the generator present on the manifest?			
5. Are the date of delivery and the handwritten signature of the next transporter or owner/operator of the TSD facility present on the manifest?			
6. Are manifested shipments of hazardous waste in containers stored at the facility for more than ten days?			
7. Does the facility transport hazardous waste out of the U.S? If yes,			
(a) Does the manifest indicate the date the hazardous waste left the U.S?			
(b) Did the transporter sign the manifest?			
8. Does the facility have a recordkeeping system for manifests with a three-year retention time?			

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TSDF STANDARDS INSPECTION CHECKLIST

SECTION I. FACILITY INFORMATION

SIC _____ Type Facility _____

Generator? ___ Yes ___ No Transp? ___ Yes ___ No Inspection date _____

Facility Name _____ I.D. No. _____ County _____

Mailing Address _____ City _____ Zip _____ Telephone Number _____

Name of Owner/Operator _____ Inspector's Signature _____

SECTION II. INSPECTION SUMMARY & REVIEW

Reason for Inspection: _____ Routine _____ Other _____

Discussed with:

1. Name: _____ Title: _____
   Address: _____ Telephone: _____
2. Name: _____ Title: _____
   Address: _____ Telephone: _____

Copy of this report submitted to:

Name: _____ Title: _____
Address: _____ Telephone: _____

Photographs: ___ yes ___ no: No. _____

Samples collected: ___ yes ___ no No. _____
Split ___ yes ___ no

Summary of Findings:

Reviewed by: _____ Review date: _____

Attachments:

SECTION III

GENERAL FACILITY STANDARDS

	Meets Requirements		
	Yes	No	N/A
1. Facility I.D. No. obtained?	✓		
2. Facility notified Director relative to: (265.12)			✓
(a) Receiving waste from foreign source?			✓
(b) Status as new owner or operator?			
3. Does facility have a written waste analysis plan specifying: (265.13)	✓		
(a) Parameters	✓		
(b) Test Methods	✓		
(c) Sampling Methods	✓		
(d) Frequency	✓		
(e) Agreement of samples with waste shipments:			
4. Security to include: (265.14)	✓		
(a) Access control to active portion	✓		
(b) 24 hour surveillance system or	✓		
(c) An artificial or natural barrier with a gate	✓		
(d) Warning signs at entrances			
5. Owner/operator inspections note: (265.15)			
Refer to facility specific standards for inspection requirements			
(a) Malfunctions, deterioration, operator error and discharges	✓		
(b) Inspections per written schedule	✓		
(c) Remedial actions on problems	✓		
(d) Inspection log entries	✓		

	Yes	No	N/A
6. Personnel Training Records Specific to Hazardous Waste Management Indicating: (265.16)			
(a) Job titles	✓		
(b) Job descriptions	✓		
(c) Description of continuing training	✓		
(d) Completion of O.J.T.	✓		
or classroom	✓		
(e) Training directed by person trained in Hazardous Waste	✓		
(f) Trained personnel can respond effectively to emergencies			
7. Preparedness and prevention through: (Subpart C - 265.30)			
(a) Maintenance and operation to minimize possibility of fires, explosions and release of hazardous waste	✓		
(b) Equipment			
(1) alarm system	✓		
(2) telephone or 2-way radio	✓		
(3) fire extinguishers	✓		
(4) water	✓		
(c) Testing and maintenance of equipment	✓		
(d) Immediate access to communications and alarm system	✓		
(e) Adequate aisle space	✓		
(f) Arrangements with local emergency response and hospital authorities	✓		
8. Prevention of Accidental Ignition or Reaction of Ignitable or Reactive Waste by: (265.17)			
(a) Segregating and protecting waste from source of ignition/reaction	✓		
(b) Posting of "No Smoking" signs	✓		
(c) Proper control during handling	✓		
(d) Containers stored 50' from property line	✓		
9. Contingency Plan and Emergency Procedure whereby: (Subpart D - 265.50)			
(a) Contingency plan written	✓		

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	Yes	No	N/A
(b) Contingency plan contains:			
(1) personnel response actions	✓		
(2) written arrangements with local authorities	✓		
(3) names, addresses and phone numbers of qualified emergency coordinator	✓		
(4) listing of emergency equipment	✓		
(5) evacuation plan	✓		
(6) SPCC plan incorporation	✓		
(c) Emergency coordinator is trained and authorized to implement plan	✓		
10. Manifest System, Recordkeeping, and Reporting to include: (Subpart E - 265.70)			
(a) Procedures for proper execution of manifest	✓		
(b) Records of past shipments	✓		
(c) Manifest discrepancies noted	✓		
resolved	✓		
(d) Written operating record	✓		
(e) Readily available records	✓		
(f) Annual Report	✓		
(g) Report on unmanifested waste			
11. Groundwater Monitoring (Subpart F - 265.90)			
(a) Applicable facility			
(If applicable, refer to "Facility Compliance Inspection Form for Groundwater Monitoring" attached)			
12. Closure and Post Closure (Post Closure-Land Disposal Only) (Subpart G - 265.110)			
(a) Adequate written closure plan available	✓		
(b) Adequate written post closure plan available	✓		
13. Financial Requirements (Subpart H - 265.140) *			
(a) Financial Assurance mechanisms in place	✓		
(b) Written estimate of closure cost available	✓		
(c) Written estimate of post closure monitoring and maintenance of facility available (Land Disposal Only)	✓		

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SECTION IV
TSD FACILITY SPECIFIC STANDARDS

	Yes	No	N/A
1. Containers (Subpart I - 265.170)			
(a) Containers in good condition	✓		
(b) Waste compatibility with containers	✓		
(c) Containers kept closed	✓		
(d) Containers managed to prevent rupture/leaks	✓		
(e) Owner/operator make weekly inspections	✓		
(f) Incompatible waste/mixtures stored in the same container	✓		
(g) Incompatible waste residues removed prior to reuse of container			
(h) Segregation and protection of incompatible waste(s)			
2. Tanks (Subpart J - 265.190)			
(a) Threat of damage to structural integrity of tank, liner(s) or delivery system due to waste(s) and/or treatment reagents			
(b) Uncovered tanks have 2 ft. (60 cm) freeboard, or a containment or diversion system			
(c) Continuous feed system(s) have a flow shutoff device			
(d) Records of additional analyses and trail runs for:			
(1) incorporation of substantially different waste(s)			
(2) new batch treatment process			
(e) Owner/operator inspections			
(1) discharge control equipment (once/day)			
(2) operational monitoring data (once/day)			
(3) waste level in uncovered tanks (once/day)			
(4) structural integrity (once/week)			
(5) discharge containment structures for uncovered tanks (once/week)			
(f) Prior to tank storage ignitable/reactive waste must be:			
(1) rendered non-ignitable/non-reactive or			
(2) tank(s) are protected from potential sources of ignition/reaction or			
(3) tank is used solely for emergencies			
(g) Use of covered tanks complies with National Fire Protection Association's buffer zone requirements			

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	Yes	No	N/A
(h) Incompatible waste(s) stored in same tank			
(i) Tanks for incompatible waste(s) are washed using an applicable method prior to reuse			
3. Surface Impoundments (Subpart K - 265.220)			
(a) Minimum of 2 ft. (60 cm) freeboard			
(b) Earthen dikes protected from erosion/deterioration			
(c) Records of additional analyses and test runs when substantial change in waste or treatment process			
(d) Owner/operator inspections			
(1) freeboard (once/day)			
(2) structural integrity of impoundment/containment system (once/week)			
(e) Prior to placing in surface impoundment, ignitable/reactive waste must be:			
(1) rendered non-ignitable/non-reactive or			
(2) surface impoundment used solely for emergencies			
(f) Impoundment used for incompatible waste			
4. Waste Piles (Subpart L - 265.250)			
(a) Prevention of wind dispersal			
(b) Each incoming movement is from compatible waste streams, or			
(c) Record of analysis on each incoming movement to determine compatability			
(d) Leachate/runoff collection system			
(e) Diversion of precipitation and run-on			
(f) Liquid or waste containing liquids placed on pile			
(g) Prior to incorporation into a pile, ignitable/reactive waste must be:			
(1) rendered non-ignitable/non-reactive or			
(2) protected from sources of ignition or reaction			
(h) Incompatible waste(s) must be:			
(1) rendered compatible or			
(2) segregated and protected from other waste or			
(3) piled in areas <u>not previously used</u> for incompatible waste			

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	Yes	No	N/A
5. Incinerators (Subpart O - 265.340)			
(a) Incinerator allowed to reach steady state condition			
(b) Record of waste analyses to determine:			
(1) steady state operating condition			
(2) BTU value			
(3) halogen content			
(4) sulfur content			
(5) lead and/or mercury content (if present)			
(c) Monitor and/or inspect instrumentation			
(1) combustion monitor(s)			
(2) emission control equipment			
(3) instruments to measure waste feed			
(4) instruments to measure auxiliary fuel feed			
(5) instruments to measure air flow			
(6) instruments to measure incinerator temperature			
(7) instruments to measure scrubber flow			
(8) instruments to measure scrubber pH			
(9) instruments to measure relevant level controls			
(10) color and opacity visually monitored hourly			
(11) daily inspection of complete incinerator and associated equipment			
(12) daily inspectio of all emergency shutdown controls and system alarms			
6. Thermal Treatment (Subpart P - 265.370)			
(a) Steady state operating condition for continuous treatment			
(b) Cyclic operation for batch treatment			
(c) Record of waste analysis to determine:			
(1) steady state/cyclic operating conditions			
(2) BTU value			
(3) halogen content			
(4) sulfur content			
(5) lead and/or mercury content			
(d) Monitoring instrumentation			
(1) temperature			
(2) emission control			
(3) waste feed			
(4) auxiliary fuel feed			
(5) process flow			
(6) process level			

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	Yes	No	N/A
(e) Inspections once/day			
(1) leaks, spills and fugitive emissions			
(2) all emergency shutdown controls and alarm systems			
(f) Open burning of hazardous waste			
(g) Detonation/burning of explosives in accordance with buffer table			
7. Chemical, Physical and Biological Treatment (Subpart Q - 265.400)			
(a) Owner/operator take adequate precautions to prevent ignition, reaction or explosion during treatment			
(b) Where applicable does continuous waste feel equipment have a cut-off or bypass system			
(c) Record of addition analyses when:			
(1) treating a substantially different waste			
(2) using substantially different process or equipment			
(d) Record of inspections for:			
(1) discharge control and safety equipment (daily)			
(2) data from monitoring instrumentation (daily)			
(3) process equipment (weekly)			
(4) discharge confinement structures and delivery system (weekly)			
(e) Prior to placing into a treatment process, ignitable/reactive waste must be:			
(1) rendered non-ignitable/no-reactive or			
(2) the process is protected from potential sources of ignition/reaction			
(f) Incompatible waste types being placed in same process			
(g) Treatment equipment washed before and after processing incompatible wastes			
8. Land Treatment (Subpart M - 265.270)			
(a) Waste is rendered hazardous or non-hazardous prior to land treatment			
(b) Run-on diversion system			
(c) Run-off collection system			
(d) Record of additional waste analyses to determine:			
(1) EP Toxicity (Table 1, 261.24)			
(2) concentrations of listed hazardous wastes (261 Subpart D)			
(3) arsenic, cadmium, lead and mercury concentrations where food chain crops are grown			

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	Yes	No	N/A
(e) If food chain crops are grown on treated land, then:			
(1) owner/operator has demonstrated that hazardous constituents are not transferred to food crops in appreciable concentrations			
(2) records demonstrating the feasibility of growing food chain crops are kept at the facility and must include:			
(i) tests for specific wastes and application rates			
(ii) crop description			
(iii) criteria for sample selection and sample size			
(iv) analytical and statistical procedures			
(3) food chain crops cannot be grown on land receiving cadmium (Cd) waste(s) unless:			
(i) pH of soil waste mixture is 6.5			
(ii) annual Cd application rate does not exceed 0.5 kg/ha. on land used for tobacco, leafy vegetables and root crops grown for human consumption			
(f) Implementation of written unsaturated zone monitoring plan designed to:			
(1) detect vertical migration of waste/waste constituents			
(2) provide background monitoring on untreated soil in same area			
(3) monitoring plan must include:			
(i) soil and soil pore water monitoring			
(ii) soil types			
(g) Records of application dates, rates, quantities and location of each hazardous waste treated.			
(h) Closure and post closure plans address objectives outlined in 265.280			
(i) Ignitable/reactive wastes are incorporated into the soil immediately so that the resulting mixture is non-ignitable/ non-reactive			
(j) Incompatible waste(s) mixtures must not be treated on the same soil.			

FACILITY COMPLIANCE INSPECTION FORM

FOR GROUNDWATER MONITORING (265, Subpart F)

Company Name: _____ Current Seq. No. _____

Company Contact: _____ Title: _____

Phone Number: _____

Compliance Officer: _____ Date of Inspection: _____

1. Is facility required to have a groundwater monitoring program? [265.90(A)] Yes/No _____
   If "Yes", what type of facility:

   (a) Surface impoundment _____
   (b) Landfill _____
   (c) Land treatment _____
   (d) Waste pile _____

2. Has a written groundwater monitoring waiver demonstration been prepared for the facility? [265.90(C)] Yes/No _____
   If "Yes",

   (a) Name and address of geologist or geotechnical engineer who certified waiver: _____

   (b) Can copy of demonstration be obtained for office review? Yes/No _____

3. Has a groundwater monitoring system been implemented? Yes/No _____
   If "Yes", what type of system:

   (a) groundwater monitoring [265.91A] ____

      (i) Was a geotechnical report prepared on the installation of the system? Yes/No _____
      (ii) Can a copy be obtained for office reivew? Yes/No _____

   (b) Alternate groundwater monitoring [265.90(d)] ____

      (i) Was system certified by a qualified geologist or geotechnical engineer? Yes/No _____
      Name: _____
      Firm: _____
      (ii) Has plan been submitted to Director? Yes/No _____

4. Has a written groundwater sampling and analysis plan been prepared? Yes/No _____
   If "Yes", does the plan include procedures and techniques for:

   (a) Sample collection Yes/No _____
   (b) Sample preservation and shipment Yes/No _____
   (c) Analytical procedures Yes/No _____
   (d) Chain of custody control Yes/No _____

   Can a copy be obtained for office review? Yes/No _____

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5. Were groundwater samples tested quarterly during the first year for the following parameters?

(a) Drinking water [265.92(b)(1)] Yes/No _____
(b) Groundwater quality [265.92(b)(2)] Yes/No _____
(c) Groundwater contamination [265.92(b)(3)] Yes/No _____

Were groundwater surface elevations determined at each monitoring well each times a sample was taken? [265.92(e)] Yes/No _____

6. For facilities which have completed first year groundwater sampling and analysis requirements?

(a) Have arithmetic mean and variance been calculated for the respective parameter concentrations or values obtained from the upgradient well? [265.92(c)(2)] Yes/No _____

(b) Have the [265.93(b)] statistical analyses been conducted? Yes/No _____
If "Yes" were there statistically significant increases (or decreases, in the case of pH) over initial background? Yes/No _____
If "Yes" have 265.93(c) & (d) groundwater quality assessment actions been taken? Yes/No _____

(c) Have groundwater surface elevations been evaluated to determine whether the monitoring wells are properly placed? [265.93(f)] Yes/No _____
If "Yes" were modifications to the groundwater monitoring system required to bring it into compliance? Yes/No _____

Were modifications made? Yes/No _____

(d) Have samples been obtained and analyzed for the groundwater quality parameters at least annually? [265.92(d)(1)] Yes/No _____

(e) Have samples been obtained and analyzed for the indicators of groundwater contamination at least semi-annually? [265.92(d)(2)] Yes/No _____

7. Has an outline of a groundwater quality assessment program been prepared? [265.93(A)] Yes/No _____
If "Yes", can a copy be obtained for office review? Yes/No _____

8. Is data, needed for geologist's field review of groundwater monitoring system, available?

(a) An accurate facility map with the monitoring wells and the hazardous waste unit(s) plotted on it? Yes/No _____

(b) Ground elevations or top of casing elevations of each monitoring well? Yes/No _____

(c) Can a copy of the above data be obtained for geologist's use? Yes/No _____

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: APR 28 1987

SUBJECT: State Inspector's Performance

FROM: Environmental Scientist

TO: Allan E. Antley, Chief
Waste Compliance Section

OK AA 4/28

THRU: John C. Lank, P.E., Chief
East Compliance Section

The State inspector was prepared and conducted an adequate inspection.

Gregory Fraley

EPA Form 1320-6 (Rev. 3-76)

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