TSD File Inventory Index

US EPA RECORDS CENTER REGION 5

1006602

Date JULY 27, 2016

Initial

Facility Name U.S. DOE (Portsmouth Gaseous Diffusion Plant)

Facility Identification Number OH7 890 008 983

A 1 General Correspondence A.1.1-A.1.2, A.1.3, A.1.5	3	B.2 Permit Docket (B 1.2)	
A.2 Part A / Interim Status A.2	1	1 Correspondence B.1.1	1
1 Correspondence	Y	2 All Other Permitting Documents (Not Part of the ARA) B.1.2(7), B.1.3-B.1.8, B.1.5(2)	10
2 Notification and Acknowledgment	Y	C.1 Compliance - (Inspection Reports) C.1	1
3 Part A Application and Amendments	Y	C.2 Compliance/Enforcement C.2(2)	2
4 Financial Insurance (Sudden, Non Sudden)		1 Land Disposal Restriction Notifications	
5 Change Under Interim Status Requests		.2 Import/Export Notifications	
6 Annual and Biennial Reports	X	C.3 FOIA Exemptions - Non-Releasable Documents C.3(7)	7
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
1 Correspondence		1 RFA Correspondence D.1.1-D.1.2	1
2 Reports		2 Background Reports, Supporting Docs and Studies see D.1.1	
A 4 Closure/Post Closure		3 State Prelim Investigation Memos	
Correspondence A.4.1	1	4 RFA Reports	
2 Closure/Post Closure Plans Certificates etc A.4.3-A.4.5	1	D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		1 RFI Correspondence D.2.1(3)	3
1 Correspondence		2 RFI Workplan	
2 Reports		3 RFI Program Reports and Oversight	
1 Administrative Record B.1	1	4 RFI Draft /Final Report	

Total - 86

5 RFI QAPP D.2.5	1	7 Lab data Soil Sampling/Groundwater	
6 RFI QAPP Correspondence		8 Progress Reports	
7 Lab Data Soil Sampling/Groundwater D.2.7(5)	5	D.5 Corrective Action/Enforcement	
8 RFI Progress Reports		1 Administrative Record 3008(h) Order	
9 Interim Measures Correspondence D.2.9	1	2 Other Non-AR Documents	
10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		1 Forms/Checklists	
1 CMS Correspondence D.3.1	1	E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		1 Correspondence	
3 CMS Workplan D.3.3	1	.2 Reports	
4 CMS Draft/Final Report D.3.4	1	F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	1
5 Stabilization		G.1 Risk Assessment	
6 CMS Progress Reports		1 Human/Ecological Assessment	
7 Lab Data, Soil-Sampling/Groundwater D.3.7 (6)	6	.2 Compliance and Enforcement G.1.2	8
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
1 CMI Correspondence D.4.1	1	4 Ecological - Administrative Record	
2 CMI Workplan D.4.2 (4)	4	5 Permitting	
3 CMI Program Reports and Oversight D.4.3	1	6 Corrective Action Remediation Study	
4 CMI Draft/Final Reports D.4.4	1	7 Corrective Action/Remediation Implementation	
5 CMI QAPP		8 Endangered Species Act	
6 CMI Correspondence		9 Environmental Justice	

Note Transmittal Letter to Be Included with Reports

Comments _____

File Inventory Sheet		Box 1 of 2
File Series: U.S. DOE (Portsmouth) RCRA 478 ID # OH7 890 008 983		
Folder #	**Date**	**Folder Description**
1	10/8/86	B.1.2 Part B Permit Application 1986 1 of 3
2	10/8/86	B.1.2 Part B Permit Application 1986 2 of 3
3	5/1/86	B.1.2 Part B Permit Application 1986 3 of 3
4	6/10/91	B.1.2 Part B Permit Application 1991 1 of 9
5	6/10/91	B.1.2 Part B Permit Application 1991 2 of 9
6	6/10/91	B.1.2 Part B Permit Application 1991 3 of 9

File Inventory Sheet		Box 2 of 2
File Series: U.S. DOE (Portsmouth) RCRA 478 ID # OH7 890 008 983		
Folder #	**Date**	**Folder Description**
1	6/10/91	B.1.2 Part B Permit Application 1991 4 of 9
2	6/10/91	B.1.2 Part B Permit Application 1991 5 of 9
3	6/10/91	B.1.2 Part B Permit Application 1991 6 of 9
4	6/10/91	B.1.2 Part B Permit Application 1991 7 of 9
5	6/10/91	B.1.2 Part B Permit Application 1991 8 of 9
6	6/10/91	B.1.2 Part B Permit Application 1991 9 of 9

File Inventory Sheet		Box 1 of 1
File Series: U.S. DOE Portsmouth		**ENFO 207**
ID # OH7 890 008 983		
Folder #	**Date**	**Folder Description**
1	1984-93	C.1 Compliance Inspection Reports
2	1993-95	C.2 Compliance & Enforcement
3	1980-92	C.2 Compliance & Enforcement
4	1984-93	C.2 Hazardous Waste Manifests
5	1990-91	C.2 Interagency Agreement with DOE

File Inventory Sheet		Box 1 of 10
File Series: U.S. DOE Portsmouth		**RCRA 206a**
ID # OH7 890 008 983		
Folder #	**Date**	**Folder Description**
1	6/95	D.1.2 Risk & the Risk Debate: Searching for Common Ground Vol. 1 Report, Vol. II & III Appendices
2	6/30/76 8/85	D.1.2 Final Report on Research & Evaluation of Selected Environmental Aspects Final Report – Environmental Program Audit
3	1989-92	D.2.1 Correspondence – Response to Comments
4	3/90	D.2.1 Comment Responses: U.S. EPA General Comments Quadrant I - RFI General Plan, Description of Current Conditions, RFI Work Plan, Health & Safety Plan
5	1992	D.2.1 Correspondence & Response to Comments – Quadrant I & II
6	6/ 90 & 12/90	D.2.1 Response to Comments on Quadrant II - Work Plan, Description of Current Conditions, Pre-Investigation Evaluation of Corrective Measure Technologies
7	1990-93	D.2.1 Response to Comments on Quadrant III Work Plan, Supplemental Environmental Project Description X-6619 WWTP Sludge Dewatering

File Inventory Sheet		Box 2 of 10
File Series: U.S. DOE Portsmouth		**RCRA 206a**
ID # OH7 890 008 983		
Folder #	**Date**	**Folder Description**
8	1990-94 8/94	D.2.1 Comments & Responses regarding the Quadrant IV Phase II Work Plan D.2.2 Draft Site Treatment Plan for the Mixed Wastes
9	10/2/93	D.2.2 Air Pathway RCRA Facility Investigation, Vol. I Work Plan & Appendices
10 10A	10/93 11/91	D.2.2 Conceptual Site Treatment Plan for Mixed Wastes D.2.2 Quadrant III RFI Work Plan
11	11/91 8/30/90	D.2.2 RFI General Plan RFI General Plan -Generic Quality Assurance Plan
12 12A	12/15/88 9/7/90	D.2.2 RFI General Plan Quadrant I - RFI Work Plan, Revised

File Inventory Sheet		Box 3 of 10
File Series: U.S. DOE Portsmouth		**RCRA 206a**
ID # OH7 890 008 983		
Folder #	**Date**	**Folder Description**
13	12/7/90 12/90	D.2.2 Quadrant II - RFI Work Plan D.2.2 Quadrant II RFI Work Plan, Health & Safety Plan, Site-Specific Provisions
14	6/19/92	D.2.2 Quadrant III RFI Work Plan Quadrant III RFI Work Plan, Appendix C –Health & Safety Plan
15	1/94 – 2/94	D.2.2 Quadrant I, II, III & IV – RFI Phase II Work Plans (for Each Quad)
16	12/92	D.2.2 Quadrant IV - RFI Work Plan
17	1991-93 2/27/95	D.2.3 Field Oversight Reports, Field Sampling Plan for Corrective Action Oversight (Draft) Air Pathway RFI Report, Vol. 1 - Text, Vol. 2 - Appendixes
18	2/19/92	D.2.4 Quadrant I – RFI Report, Appendix B

File Inventory Sheet		Box 4 of 10
File Series: U.S. DOE Portsmouth		**RCRA 206a**
ID # OH7 890 008 983		
Folder #	**Date**	**Folder Description**
19	2/19/92	D.2.4 Quadrant II - RFI Report
20	8/4/92	D.2.4 Quadrant III – Technical Memorandum, RFI, Field Screening
21	4/12/94	D.2.5 Air RFI Work Plan & Quality Assurance Project Plan
22	1/24/94	D.2.5 Air Pathway RFI Work Plan, Vol. 2 - QAPP
23	5/92	D.2.5 Air Pathway RFI Work Plan, Vol. 2 - QAPP, Attachments
24	1990-92 1989-95	D.2.5 QA/QC Data D.2.6 QAPP Correspondence

File Inventory Sheet		Box 5 of 10
File Series: U.S. DOE Portsmouth		**RCRA 206a**
ID # OH7 890 008 983		
Folder #	**Date**	**Folder Description**
25A 25B	1984-95 5/5/89	D.2.7 Groundwater, Soil, Well Water Sampling Data Correspondence D.2.7 Quadrant I – Description of Current Conditions
26	12/90	D.2.7 Quadrant II – Description of Current Conditions
27	11/1/91	D.2.7 Quadrant III – Description of Current Conditions
28A 28B 28C	12/92 12/6/93 12/92	D.2.7 Quadrant IV – Description of Current Conditions D.2.7 Background Sampling Investigation Work Plan D.2.7 Quadrant III – RFI
29 29A	10/89 & 5/90 12/92	D.2.7 Site-Wide Ground Water Flow Model D.2.7 RFI Sampling Plan, Vol. 1
30	12/90	D.2.7 X-701B Soil Boring Program – Final Report

File Inventory Sheet		Box 6 of 10
File Series: U.S. DOE Portsmouth		**RCRA 206a**
ID # OH7 890 008 983		
Folder #	**Date**	**Folder Description**
31	12/88	D.2.7 Ohio Dept. of Health Study of Radioactivity in Drinking Water & Other Environmental Media
	1/11/93	Results of Geoprobe Investigation of the X-749 Plume
	8/93	Groundwater Protection Program, Management Plan
31A	6/5/92	D.2.7 Appendix C-1 Analytical Reports (Replacement Appendix C)
32	1/86	D.2.7 Hydrogeologic Evaluation – Site # 231B, Site # 616 - Goodyear Uranium Enrichment Plant – Piketon, OH
	1/86	Hydrogeologic & Ground water Quality Investigation at the Goodyear Atomic Corp, X-749 Contaminated Materials Disposal Facility, & X-701B Water Treatment Facility, Piketon, OH
	2/86	Results of a Preliminary Ground Water Solute Transport Model for the Goodyear Atomic Corp, X-749 Contaminated Materials Disposal Facility, Piketon OH
33A	8/31/87	D.2.7 Final Report on Leaching Procedure, Toxicity Testing of Wastes
	6/6/94	Vadose Zone Soil Leaching Study – Conceptual Work Plan
33B	1993	D.2.8 Meeting Minutes & Progress Reports
34	1989-92	D.2.8 Meeting Minutes & Progress Reports
34A	1989-94	D.2.8 Environmental Restoration Program – Monthly Technical Progress Report
35	7/91-1/94	D.2.10 Interim Measures Plan
	10/92	Site X-749 Interim Remedial Plan
		Site X-749 QAPP for Interim Remedial Plan
		Site X-749 Health & Safety Plan for Soil Gas & Soil Sampling
		Site X-749 Field Sampling Plan for Interim Remedial Plan
35A	1993-94	D.2.10 Interim Measures Plan for Peter Kiewit Landfill
36	2/18/94	D.2.10 Quadrant I RFI Interim Risk Assessment Report

File Inventory Sheet		Box 7 of 10
File Series: U.S. DOE Portsmouth		**RCRA 206a**
ID # OH7 890 008 983		
Folder #	**Date**	**Folder Description**
37A 37B	1991 1988-90	D.2.10 X-701B & 231-B Interim Measures Plans D.2.10 Response to OEPA & U.S. EPA Comments on the Report – Interim Remedial Measures Analysis for X-701B Groundwater Control Near Little Beaver Creek
38A 38B	1993 1990-93 9/9/93	D.2.10 X-749 & X-120 Interim Remedial Measures & IRM Characterization Study D.3.1 CMS Correspondence D.3.3 Remedial Technologies Database for the Cleanup Alternatives Study/Corrective Measures Study
39A 39B	6/2/94 6/2/94	D.3.4 Quadrant I – Draft Cleanup Alternatives Study/Corrective Measures Study Report, Vol. 1 (Sections 1 to 5) D.3.4 Quadrant I – Draft Cleanup Alternatives Study/Corrective Measures Study Report, Vol. 2 (Sections 6 to 10)
40	6/2/94	D.3.4 Quadrant I – Draft Cleanup Alternatives Study/Corrective Measures Study Report, Vol. 3 – Cost Addendum (Sections 7 to 10)
41	3/2/94	D.3.4 Quadrant II – Draft Cleanup Alternatives Study/Corrective Measures Study Report, Vol. 1 of 2 & Vol. 2 of 2

File Inventory Sheet		Box 8 of 10
File Series: U.S. DOE Portsmouth		**RCRA 206a**
ID # OH7 890 008 983		
Folder #	**Date**	**Folder Description**
42	2/1/94	D.3.4 Quadrant II Draft - Cleanup Alternatives Study/Corrective Measures Study, Report, Cost Addendum (Section 6 to 9)
43	4/21/95	D.3.4 Quadrant III Draft - Cleanup Alternatives Study/Corrective Measures Study, Report, Vol. 1 – Text/Figures/Tables
44	4/21/95	D.3.4 Quadrant III Draft - Cleanup Alternatives Study/Corrective Measures Study, Report, Vol. 2 – Appendices A to E
45	4/14/95	D.3.4 Quadrant IV Draft - Cleanup Alternatives Study/Corrective Measures Study, Report, Vol. 1 – Text/Figures/Tables, Vol. 2 – Appendices A to E
46A	1993-94	D.3.6 CMS Progress Reports
46B	3/2/94	D.3.4 X-701B Draft - Cleanup Alternatives Study/Corrective Measures Study, Report
46C	12/7/90	D.3.7 Pre-Investigation Evaluation of Corrective Measure Technologies
47	7/13/94	D.3.7 X-611A Draft - Cleanup Alternatives Study/Corrective Measures Study, Report

File Inventory Sheet		Box 9 of 10
File Series: U.S. DOE Portsmouth		**RCRA 206a**
ID # OH7 890 008 983		
Folder #	**Date**	**Folder Description**
48	6/2/94	D.3.7 X-749/X-120 Draft - Cleanup Alternatives Study/Corrective Measures Study, Report
49A 49B	1988-94 1989-94 1992-93	D.5.1 3008(h) Correspondence D.5.2 3008(h) Order (Administrative Consent Order) – drafts D.5.7 Informal Dispute Resolutions
50	12/5/94	G.1.2 Baseline Ecological Risk Assessment, Vol. 1 – Text & Plates
51	12/7/94	G.1.2 Baseline Ecological Risk Assessment, Vol. 2 – Appendixes A & B
52	12/7/94	G.1.2 Baseline Ecological Risk Assessment, Vol. 3 – Appendixes C to E
53	12/7/94	G.1.2 Baseline Ecological Risk Assessment, Vol. 4 – Appendixes F to J
54	12/7/94	G.1.2 Baseline Ecological Risk Assessment, Vol. 5 – Appendixes K to Q

File Inventory Sheet		Box 10 of 10
File Series: U.S. DOE Portsmouth		**RCRA 206a**
ID # OH7 890 008 983		
Folder #	**Date**	**Folder Description**
55A	3/9/94	G.1.2 Technical Memorandum, Baseline Ecological Risk Assessment: Soil Toxicity Testing Task – Winter Sampling Period
55B	11/30/93	G.1.2 Baseline Ecological Risk Assessment Workplan Vol. 1 to 4, Text & Appendices A to R
56	9/93	G.1.2 Baseline Ecological Risk Assessment Workplan Vol. I Text & Appendix A
	9/93	Baseline Ecological Risk Assessment Workplan Vol. II, Appendices B & C
57	6/93	G.1.2 Baseline Ecological Risk Assessment Workplan Vol. III, Appendices D to M
	6/93	Baseline Ecological Risk Assessment Workplan Vol. IV, Appendices N to P, & Plates I, II, III, & IV
58A	4/92-11/93	G.1.2 Fish Tissue Data
58B	12/92	G.1.2 Baseline Ecological Risk Assessment Workplan

File Inventory Sheet		Box 1 of 1
File Series: U. S. DOE (Portsmouth)		RCRA 478a
ID # OH7 890 008 983		
Folder #	**Date**	**Folder Description**
1	1997	F.1 Imagery/Special Studies - P Kiewit Landfill, drawings
2	1992-96	F.1 Imagery/Special Studies - drawings, photos, maps
3	1985-93	F.1 Imagery/Special Studies - drawings, maps

HAZARDOUS WASTE
R M S

RECORDS RETIREMENT

CBI:	No
Shipment Date:	3/14/1996
Agency File Code:	RCRA 478a
Accession Number:	412-96-0325
Volume (cubic ft):	30
Disposal Authority:	N1-412-94-04/20a
Transfer Date:	1/31/2010
Location:	002108-002137SAN

Box Number	Facility	Description
1	ILD082089012 Peterson Puritan Inc. (Danville Facility)	Part B Permit Appl, Surf Imp Closure plan 10/14/87 - 03/10/88
2	ILD082089012 Peterson Puritan Inc. (Danville Facility)	Part B Append, RFI 1985-1989
3	ILD082089012 Peterson Puritan Inc. (Danville Facility)	Part B Appl, Retro Fitting Varience Append, Prel Eng Rep. 1975-1986
4	IND072051394 Purdue University (West Lafayette Campus)	RFI Info, Sampling QA/QC, Site Inv Analysis 1987-1989
5	IND072051394 Purdue University (West Lafayette Campus)	Part B Appl, Draft RFI Report, 1985-1989
6	OH7571724312 U.S.Air Force (Wright Patterson Air Force Base)	Part B Permit Appl, Project Plan, Site Inspection Notes 1986-1989
7	ILD980700751 BFI Waste Systems of North America, Inc.	Post Closure Permit Appl, 1989
8	ILD980700751 BFI Waste Systems of North America, Inc.	Post Closure Permit Appl, GW Quality Assessment 1988-1989
9	OH7890008983 US DOE (Portsmouth Gaseous Diffusion	GW Assessment, Part B Permit Appl, Pond Closure Plans 1986-1989

	Plant)	
10	OH7890008983 US DOE (Portsmouth Gaseous Diffusion Plant)	Part B Permit Appl 05/87
11	OH7890008983 US DOE (Portsmouth Gaseous Diffusion Plant)	Bio Degradation Plot Closure Plan, Landfill closure plan, 1985-1995
12	OH7890008983 US DOE (Portsmouth Gaseous Diffusion Plant)	Pre-Inv eval corr meas, RFI, Current Conditions, RFI workplan 1989
13	OH7890008983 US DOE (Portsmouth Gaseous Diffusion Plant)	Closure plans, maps, blueprints, Part B Permit Appl (no date)
14	OH7890008983 US DOE (Portsmouth Gaseous Diffusion Plant)	Closure Info, GW Info 1988-1989
15	OH7890008983 US DOE (Portsmouth Gaseous Diffusion Plant)	Closure Plan Info (no date)
16	OH7890008983 US DOE (Portsmouth Gaseous Diffusion Plant)	Closure plan info, Env Survey 1988-1989
17	OHD000821348 Teledyne Monarch Rubber Co. (Plants #2 & 5)	Misc Corresp, Part B Permit Appl, GW Monitoring, Closure Plans 1983-19
17	OHD068901610 TDY Industries, Inc. (Plant 1)	Misc Corresp, Part B Permit Appl, Hydro Study, GW Monitoring, Closure I 1983-1988
18	OHD068901610 TDY Industries, Inc. (Plant 1)	GWM Plan, Monthly Reports, GW Remedial Action Program, 1985-1987
18	OHD000821348 Teledyne Monarch Rubber Co. (Plants #2 & 5)	GWM Plan, Monthly Reports, GW Remedial Action, GWM Eval Final Rep
19	IND078911146 Chemical Waste Mgm. of Indiana,LLC (Adams Fac,)	GW Assessment, NOD Part B, Response to Tech Def, Construct Docs, G Task Force Eval Report 1984-1988
20	IND078911146 Chemical Waste Mgm. of Indiana,LLC (Adams Fac,)	Part B Permit Appl, 1/7/87
21	IND078911146 Chemical Waste Mgm. of Indiana,LLC (Adams Fac,)	Part B Permit Appl, 1987-1988
22	IND078911146 Chemical Waste Mgm. of Indiana,LLC (Adams Fac,)	Part B Permit Appl, Reports, Invest, Workplans, Aerial photos (no date)
23	IND078911146 Chemical Waste Mgm. of Indiana,LLC (Adams Fac,)	Construc Drawings, Surface Water Mgt Plans, Part B Permit Appl, QA systems,final cover systems 1985-1986

OH7 890 008 483

LAND AND CHEMICALS DIVISION

Type of Document: No Violation Detected Letter

Name of Document: U.S. DOE Portsmouth Gaseous Diffusion Plant, Piketon, Ohio

	NAMES	DATE
AUTHOR:	W. Francis WF	5/17/2016
APA:	G. Cuerington	
SECTION CHIEF:	J. Morris	5/17/16
BRANCH CHIEF:		
DIVISION APA:		
DIVISION DIRECTOR:		
ORC:		
DRA:		
RA:		

RETURN TO: Walt Francis

PHONE: 3-4921

COMMENTS:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 20 2016

Mr. Robert E. Edwards, III
Acting Manager
Portsmouth/Paducah Project Office
U.S. Department of Energy
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

REPLY TO THE ATTENTION OF.

Mr. Dennis Carr
Fluor-B&W Portsmouth, LLC
Post Office Box 548
Piketon, Ohio 45661

Re: Compliance Evaluation Inspection
EPA I.D. No.: OH7 890 008 983

Dear Messrs. Edwards and Carr:

On April 12th and April 13th, 2016, representatives of the U.S. Environmental Protection Agency and Ohio Environmental Protection Agency (Ohio EPA) inspected the U.S. Department of Energy Portsmouth Gaseous Diffusion Plant (U.S. DOE-Portsmouth) located near Piketon, Ohio. The purpose of the inspection was to evaluate U.S. DOE-Portsmouth's compliance with hazardous waste, universal waste, and used oil requirements of the Resource Conservation and Recovery Act (RCRA) and the January 15, 2016 modified RCRA Permit. We have enclosed a copy of our inspection report for your reference.

Our inspection did not detect violations of the specific RCRA requirements evaluated. Please note that this evaluation is based on observations made by, and information disclosed to EPA and Ohio EPA during the inspection. This letter does not relieve U.S. DOE-Portsmouth of its obligation to comply with RCRA and other environmental regulations and statutes. If you have any questions or concerns regarding this matter, please contact Mr. Walt Francis, of my staff, at 312-353-4921.

Sincerely,

Julie Morris, Chief
RCRA Compliance Section 2

Enclosures

cc: Brian Queen, Ohio EPA (brian.queen@epa.ohio.gov)
Dr. Vincent Adams, Portsmouth Site Director (vince.adams@lex.doe.gov)

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME:	**U.S. DOE PORTSMOUTH GASEOUS DIFFUSION PLANT**
FACILITY U.S. EPA ID NO.:	**OH7 890 008 983**
FACILITY TYPE:	**Large Quantity Generator and Container Storage Facility**
FACILITY ADDRESS:	3930 US Route 23 South Piketon, Ohio 45661
U.S. EPA REPRESENTATIVE:	Walt Francis
DATE(S) OF INSPECTION:	April 12th and April 13th, 2016
SIC CODE:	2819 - Industrial Inorganic Chemicals, Not Elsewhere Classified
NAICS CODE:	325188 - All Other Basic Inorganic Chemical Manufacturing

PREPARED BY: _____ 5/3/2016
Walt Francis **Date**
Environmental Scientist

APPROVED BY: _____ 5/4/16
Julie Morris, Chief **Date**
Compliance Section 2
RCRA Branch

Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the U.S. Department of Energy (U.S. DOE) Portsmouth Gaseous Diffusion Plant (Portsmouth), Piketon, Ohio to determine its compliance with the Resource Conservation and Recovery Act (RCRA), the Ohio Administrative Code (OAC), and the RCRA Permit requirements with respect to U.S. DOE's and Fluor-BWXT Portsmouth, LLC's management of hazardous waste, universal waste and used oil.

Participants

U.S. Environmental Protection Agency (U.S. EPA) Inspector -
Walt Francis, Environmental Scientist

Ohio Environmental Protection Agency (Ohio EPA) Inspectors -
Brian Queen, Lead Environmental Specialist
Dustin Tschudy, Site Coordinator

Representatives of U.S. DOE, Fluor-BWXT Portsmouth, LLC (Fluor-BWXT), Wastren-EnergX Mission Support, LLC (WEMS), Restoration Services (RSI) -
Amy Lawson, U.S. DOE
Kristi Wiehle, U.S. DOE
Rosemary Richmond, RSI
Bob Anderson, WEMS
Barbara Halcomb, Fluor-BWXT
Chris Guilliams, Fluor-BWXT
Jeremy Davis, RSI
Mitch Newman, Fluor-BWXT
Ryan Callihan, Fluor-BWXT
Frank Johnston, Fluor-BWXT

Site Description/Background Information

Historically, the main function of the Portsmouth facility was to enrich uranium for military use (nuclear submarines and nuclear weapons) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in uranium hexafluoride (UF6) feedstock which contains 0.711% U235. The Portsmouth facility was constructed from 1952 to 1956 and had produced enriched uranium continuously since September 1954. In 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). U.S. DOE retained ownership of the ongoing site environmental restoration program as well as the permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and were leased by USEC. As of March 2012, U.S. DOE and Fluor-BWXT activities included decontamination of equipment and uranium recovery (X-705 Building); chemical cleaning of equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); vehicle repair (X-750); coal pile runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in U.S. DOE owned and permitted storage facilities. Waste generated by U.S. DOE and Fluor-BWXT from the environmental restoration is also stored in these facilities. U.S. DOE also generates non mixed radioactive hazardous waste, universal waste and used oil which is shipped out of Building XT-847. USEC ceased the enrichment process in May 2001, and discontinued on-site operations on October 10, 2011. U.S. DOE and Fluor-BWXT manage hazardous waste, universal waste and used oil generated from on-site maintenance, on-site storage activities, remediation, and demolition activities.

Uranium contaminated hazardous wastes (mixed waste) which were generated by USEC and are generated by U.S. DOE and Fluor-BWXT are stored on-site in U.S. DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of treatment, storage and disposal (TSD) facilities in the United States which could accept mixed waste, and a May 1991 U.S. DOE moratorium on off-site waste shipment. A large percentage of the waste generated at Portsmouth is U.S. DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in U.S. DOE-owned storage areas.

U.S. DOE/Fluor-BWXT generated hazardous wastes are primarily shipped to: Permafix Environmental/M&EC, Oak Ridge, Tennessee (TNR000005397); EQ Detroit, Detroit, Michigan (MID980991566), DSSI/Permafix, Kingston, Tennessee (TND982109142), Chemical Waste Management, Emelle, Alabama (ALD000622464); and Energy Solutions-Bear Creek Treatment Facility, Oak Ridge, Tennessee (TND982157570). In addition, a wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes.

On March 25, 2011, Ohio EPA renewed the RCRA Permit for the Portsmouth facility. The renewed RCRA Permit includes six container storage areas in Building X-326. The renewed RCRA Permit states in Section B.36(m) that U.S. DOE/Fluor-BWXT may store restricted waste beyond one year; however, the Permittee bears the burden of proving that such storage was solely for the purpose of accumulating such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal [OAC Rule 3745-270-50].

On September 17, 2015, Fluor-BWXT sent an application to Ohio EPA to modify the RCRA Permit to include RCRA waste handling capabilities in Buildings X-330, X-345 and X-705 and the phase out of the current RCRA waste storage area in Building X-326. The changes also

included the addition of Closure Plans for the X-330, X-345 and X-705 proposed RCRA storage areas, as well as modifications to the Waste Analysis Plan, Procedures to Prevent Hazards, Contingency Plan and Personnel Training sections of the RCRA Permit. On October 15, 2015, the facility held a public meeting, and the public comment period for the proposed modification ended on November 19, 2015. On October 23, 2015, Ohio EPA sent a Hazardous Waste Permit Class 2 Modification Notice of Deficiency to U.S. DOE and Fluor-BWXT. On January 15, 2016, Ohio EPA approved the Permit Modification.

On December 17, 2015, U.S. DOE submitted an Annual Report to Ohio EPA for Fiscal Year 2015 for the April 13, 2010 Ohio EPA Director's Final Findings and Orders for Removal Action and Remedial Investigation and Feasibility Study and Remedial Design and Remedial Action. Currently, Records of Decision for the Site-wide Waste Disposition and Decontamination and Decommissioning of Process Buildings and Complex facilities were finalized in 2015. Decontamination and decommissioning (D&D) work has started in the X-326 building. Soil remediation at the X-114A firing range occurred in 2015 and D&D work on the structures should occur this year. The land where the on-site landfill is to be located has been cleared of trees. Currently, they are wrapping up sampling of the deferred units at the site.

Opening Conference

On April 12, 2016, Walt Francis, Brian Queen, and Dustin Tschudy arrived at Building X-1000 at approximately 7:45 a.m. and informed the U.S. DOE, RSI, and Fluor-BWXT representatives of the nature, scope, and procedures for the inspection. The inspection was conducted by U.S. EPA and Ohio EPA personnel as a Federal lead inspection. The facility representatives provided the team with a brief update of the facility, and a list of current hazardous waste satellite accumulation area (SAA) containers, hazardous waste less than 90 day accumulation areas, and universal waste accumulation areas. The current site activities include: D&D; the DUF6 Conversion Plant; and the Centrus facility research and demonstration project. The Portsmouth site currently has approximately 2,570 employees (Fluor-BWXT-1852, WEMS–180, RSI-56, and U.S. DOE-21). Ms. Lawson did not make a confidential business information claim on the information gathered during the inspection. Ms. Lawson allowed the inspectors access to the facility to conduct the inspection.

Site Tour

The RCRA inspection team included Mr. Ryan Callihan, Mr. Jeremy Davis, Mr. Mitch Newman, Mr. Brian Queen, Mr. Dustin Tschudy, and Mr. Walt Francis. The inspection began at Building X-624. Ms. Wendy Stewart, Ground Water Treatment Facility Operations, showed the inspectors a 55-gallon SAA container labeled "F001, Bag Filters, PPE, and Plastic". The walk-through continued to Building X-622. Mr. Callihan showed the inspectors a 55-gallon SAA container labeled "F001, Bag Filters, and Plastic". The walk-through continued to Building X-752. Mr. Callihan introduced Mr. Kevin Cawley, Facility Manager. Mr. Cawley took the inspectors to Building X-752. The inspectors observed a universal waste accumulation area.

Inspector Francis observed six containers of 8 foot used fluorescent lamps which were dated "4/6/16". The walkthrough continued to Bay Q. Inspector Francis observed a 10-gallon SAA container labeled "Lead Fasteners, D008", a 30-gallon container labeled "Empty Aerosol Cans", and a 10-gallon container labeled "Non-Flammable Aerosols". The walkthrough continued to Bay R. Inspector Francis observed one container labeled "PPE Trash, D008, 3/23/16" and two containers labeled "Lead Bullets, D008, 3/23/16, X-114A". The walkthrough continued to the less than 90 day accumulation area. Inspector Francis observed three containers labeled "PPE/Trash, Pending Analysis, 2/9/16, #15-006319". The walkthrough continued to Building X-627. Ms. Stewart showed the inspectors a 55-gallon SAA container labeled "PPE, Bag Filters, F001", and a less than 90 day accumulation area with a 55-gallon container labeled "PPE, Bag Filters, F001, 3/15/16". The walkthrough continued to Building X-623. Ms. Stewart showed the inspectors a 55 gallon SAA container labeled "F001 Filter Bags". In addition, the inspectors observed a hazardous waste less than 90 day accumulation area. Inspector Francis observed a container labeled "carbon, 3/11/16". In addition, Inspector Francis observed a Vacuum Truck which was labeled "Hazardous Waste, F001, 3/11/16". The walk-through continued to Building XT-847. Ms. Lindsay Moore showed the inspectors Area N-2 a hazardous waste less than 90 day accumulation area. Inspector Francis observed a 55-gallon container labeled "Broken Bulbs, D008/D007, 4/7/16, #16-001544 (WMG)". The walkthrough continued to Area C8. Inspector Francis observed twelve pallets of universal waste used fluorescent lamps, a 55-gallon SAA container labeled "D009, D008", an SAA labeled Battery Fluid, D002". The walkthrough continued to column D17. Inspector Francis observed a container labeled "Broken Fluorescent Lamps, D008/D009". The walk-through continued to Column D25. Inspector Francis observed five containers of used fluorescent lamps with accumulation dates of "11/14/14", "2/15/15", "11/14/15", "11/14/15" and "3/5/2015". The walkthrough continued to Area C2 which was empty. The walk-through continued to the Fire Station, Building X-1007. Mr. Ryan Callahan showed the inspectors a container of universal waste in a mechanical room in the fire station. Inspector Francis observed one container labeled "Universal Waste Bulbs, 2/11/16", a container labeled "Used Batteries, 8/27/15", and a container labeled "Compact Fluorescent Bulbs, 3/29/16".

The walk-through continued to the Garage, Building X-750. Mr. Callihan introduced Ms. Beverly Kelley. Ms. Kelley showed the inspectors a hazardous waste less than 90-day hazardous waste accumulation area which was empty. Ms. Kelley showed the inspectors a 5-gallon SAA container of solvent rags, a container of universal waste, and a container of used antifreeze. Ms. Kelley showed the inspectors an outside metal locker containing used oil. Inspector Francis observed two 55-gallon containers labeled "Used Oil". The walk-through continued to the Center Control Area, Building X-300. The inspectors observed a small container of universal waste bulbs, dated "4/11/2016".

The inspection continued to Building X-720. Ms. Kelley showed the inspectors a hazardous waste less than 90 day Hazardous waste accumulation area with three containers of used aerosol cans labeled "Aerosol Cans, D001" with accumulation dates of 1/23/16, 1/23/16 and 3/9/16. In addition, the inspectors observed a container of broken bulbs which was dated 3/9/16. Ms.

Kelley showed the inspectors a universal waste container which was dated 8/26/15, a container labeled "HID" which was dated 3/29/16, a container labeled Compact Fluorescent Bulbs which was dated 3/8/16, a container of used fluorescent lamps which was dated 11/12/15, a container labeled incandescent dated 9/28/15, and a container labeled "HID Bulbs" with a 10/5/15 accumulation date. The walkthrough continued to columns J6 and J7. Ms. Kelley showed the inspectors several boxes of used fluorescent lamps. Inspector Francis noted accumulation dates of 2/8/16, 4/6/16, 12/28/15, and 10/29/15. The walkthrough continued to Building X-720C. Ms. Kelley showed the inspectors a hazardous waste less than 90-day accumulation area. Inspector Francis observed a 55-gallon container labeled "D011, 4/6/16". Ms. Kelley also showed the inspectors several 55-gallon containers of used oil in Building X-720C. The walkthrough continued to the Respirator Area in Building X-720. Ms. Kelley showed the inspectors a container for used respirator power supplies. Inspector Francis observed a universal waste container labeled "Nickel Metal Hydride, 12/10/15". The walkthrough continued to the Air Pal Shop. Ms. Kelley showed the inspectors a 5-gallon SAA container labeled "Oxygen Sensors". The walkthrough continued to the Cleaning Room. Ms. Kelley showed the inspectors a polybottle SAA area. The walkthrough continued to the Radio Shop. Ms. Kelley showed the inspectors a 5-gallon SAA container labeled "ITM Sensors". The walk-through continued to Building X-330. Mr. Callihan introduced Ms. Vickie Glenn to the inspectors. Ms. Glenn showed the inspectors a hazardous waste less than 90 day accumulation area at column L49. Inspector Francis observed that the area was empty. The walkthrough continued to the Electrical Shop. Ms. Glenn showed the inspectors a 55-gallon SAA container labeled "Broken Bulbs". The walk-through continued to column W35. Ms. Glenn showed the inspectors several pallets of universal waste lamps dated "3/2/16" and "1/16/16". The walkthrough continued to ACR3. Ms. Glenn showed the inspectors a universal waste container dated "4/11/16". The walk-through continued to Column EE-35. Ms. Glenn showed the inspectors a 5-gallon SAA container of solvent rags. The walkthrough continued to a hazardous waste less than 90 day accumulation area. Ms. Glenn showed the inspectors a container of "E-Scrap" labeled "D008, Lead", and a 55-gallon SAA container. The walkthrough continued to Building X-333. Ms. Glenn showed the inspectors a universal waste accumulation area at Column C-10. Inspector Francis observed one box of used fluorescent lamps labeled Universal Waste and dated 3/28/16. The walk-through continued to the ACR1 where Ms. Glenn showed the inspectors a one gallon universal waste container. The inspection continued to Building X-530. Ms. Glenn showed the inspectors several universal waste containers dated "12/23/15", "2/29/16, and "11/17/15". The walk-through continued to the "Battery Room". Ms. Glenn showed the inspectors a 5-gallon SAA container labeled "Battery Acid".

The inspection continued to Building X-326. Ms. Glenn met the inspectors and walked to column C49. Ms. Glenn showed the inspectors a universal waste container dated 3/9/16 and a container of mercury switches dated 3/9/16. The walk-through continued to column D48. Ms. Glenn showed the inspectors a 55-gallon SAA container of broken bulbs, dated 4/9/16. The walkthrough continued to the ACR. Ms. Glenn showed the inspectors a container of universal waste bulbs. The walkthrough continued to Building X-343. Mr. Callihan showed the inspectors a universal waste container of lithium batteries dated 2/4/16, and a container of nickel metal

hydride batteries with an accumulation date of 3/14/16. The walkthrough continued to Building X-344A. Mr. Callihan showed the inspectors a universal waste accumulation area at column C15. Inspector Francis observed two containers of universal waste lamps dated 3/20/16 and 4/11/16, a container of used incandescent bulbs dated 3/20/16, a container of universal waste mercury switches dated 3/20/2016, and a container of used oil. The walkthrough continued to Building X-700. Mr. Callihan showed the inspectors a hazardous waste less than 90 day area accumulation area. Inspector Francis observed a container of soil samples which was dated 2/9/16. Mr. Callihan showed Inspector Francis a universal waste accumulation area at column E3. Inspector Francis observed a container of universal waste nickel cadmium batteries dated 8/25/15, a container of used incandescent bulbs dated 3/8/16, and a container of 48 inch used fluorescent lamps dated 3/8/16. The walkthrough continued in Building X-700 to the WEMS area. Mr. Callihan introduced Mr. Bob Anderson. Mr. Anderson showed the inspectors a 30-gallon SAA container of used paint rags, and two 10-gallon containers labeled "Empty Aerosol Cans". Mr. Anderson showed the inspectors a "Used Antifreeze" container that said "Pending Analysis" and three 55-gallon containers labeled "Used Oil". Mr. Anderson then showed the inspectors the universal waste accumulation area. Inspector Francis observed seven boxes of 48 inch universal waste lamps, which were dated 3/16/16 and 11/15/15. Mr. Anderson showed the inspectors several pallets of used lead acid batteries in this area.

On April 13, 2016, the inspectors arrived at Building X-1000 at approximately 7:45 a.m. Mr. Callihan took the inspectors to Building X-705. The inspectors met Mr. Marvin Ross and Mr. Jeff Woodard. Mr. Woodard provided a safety orientation for the inspection group prior to entering the controlled area. The inspectors donned another pair of coveralls, boot covers, a pair of booties and two pairs of gloves. Mr. Ross took the inspectors into the radiation zone in Building X-705. Mr. Ross showed the inspectors a universal waste accumulation area. Inspector Francis observed two boxes of used fluorescent lamps dated 3/22/16. Mr. Ross then took the inspectors to view two SAA containers at the "Micro Area". Mr. Ross then showed the inspectors the new RCRA Permitted storage area. The walkthrough continued to an SAA area with a 55-gallon container for used aerosol cans. The walkthrough continued to a hazardous waste less than 90-day accumulation area which was empty. The walkthrough continued to the second floor where Mr. Ross showed the inspectors another hazardous waste less than 90 day accumulation area. Inspector Francis observed a container labeled "Ash Solution" with a 2/1/2016 accumulation date. The walkthrough continued back to the first floor where Mr. Ross showed the inspectors Heavy Metal Precipitate hazardous waste less than 90 day container. The inspection continued to Building X-326. Mr. Craig Herrmann showed the inspectors the RCRA Permitted areas in Building X-326. The inspectors walked through RCRA Area #4. Inspector Francis noted a hazardous waste container labeled Ash Solution, D002/D006/D007/D008/ D009/D011, and HN03, dated 10/1/82. The inspectors walked through RCRA Area #2. Inspector Francis a 55-gallon container labeled "Non-Hazardous Floor Sweepings and Paint Chips, RFD 08-001752". The inspectors walked through RCRA Area #5. Inspector Francis observed a 55-gallon container labeled "Mop Water and Floor, D009, #16-000689 12/29/15, DOE X345". The inspectors walked through RCRA Area #3 which was empty. The inspectors walked through Area #1 which was empty. The walkthrough continued to the L-Cage West.

Inspector Francis observed a polybottle labeled MC-107 D002, #13-003518, 4/4/13. The walk-through continued to the L-Cage East. The inspectors observed the containers in storage. The inspection continued to Building X-710. The inspectors met Mr. Brandon Fosson. Mr. Fosson showed the inspectors a universal waste accumulation area on the loading dock. Inspector Francis observed six 4 foot used fluorescent lamp containers dated "2/16/16, 8/15/15, and 8/24/14". Mr. Fosson showed the inspectors a hazardous waste less than 90 day accumulation area in Room 103. Inspector Francis observed several containers of D002 waste. The walk-through continued to Room 111. Mr. Fosson showed the inspectors a hazardous waste SAA containing three polybottles. The walkthrough continued to Room 113. Mr. Brandon showed the inspectors an SAA container of used aerosol cans outside of Room 113. The walkthrough continued to Room 114. Mr. Fosson showed the inspectors an SAA with several polybottles. The walkthrough continued to Room 142. Mr. Fosson showed the inspectors an SAA container. The walkthrough continued to Room 139. Mr. Fosson showed the inspectors a Perkin Elmer Mass Spectrometer. Inspector Francis noted that the waste container was labeled as hazardous waste. The walkthrough continued to Room 157. Mr. Fosson showed the inspectors two SAA polybottles and two 5-gallon containers labeled "Waste Acetone". The walkthrough continued to Room 154. Mr. Fosson showed the inspectors a 5-gallon SAA container. The walkthrough continued to Room 281. Mr. Fosson showed the inspectors two 5-gallon SAAs. The walkthrough continued to Rooms 285, 221, 218 and 216. Inspector Francis observed two 5-gallon SAA containers in Room 216. The walkthrough continued to Room 254. Mr. Fosson showed the inspectors five 5-gallon SAA containers. The walkthrough continued to Room 245. Mr. Fosson showed the inspectors two 5-gallon SAA containers. The inspection continued to Building X-622. Mr. Bob Anderson showed the inspectors two 55-gallon containers of used oil. The walkthrough continued to Building X-744K. Mr. Anderson showed the inspectors a 55-gallon SAA container in a locked metal cabinet. Inspector Francis observed that the label stated "Pending Analysis, Asphalt Emulsion/Diesel Fuel, from X-735, #15-005233."

The inspection group went to Building X-157A to review records.

Records Review

A records review was conducted at Building X-157A. The inspectors reviewed hazardous waste manifests, universal waste, used oil shipping records, personnel training information, current version of the contingency plan, weekly inspection logs, and waste profiles. The inspectors reviewed hazardous waste manifests since the date of the last inspection, two years of personnel training records, waste profiles, and weekly inspection logs. Hazardous wastes were being shipped to: Permafix of Florida, Gainesville, Florida (FLD980711071), DSSI/Permafix, Kingston, Tennessee (TND982109142), and Energy Solutions-Bear Creek Treatment Facility, Oak Ridge, Tennessee (TND982157570). The last off-site shipment was dated April 13, 2016. Universal Waste used fluorescent lamps and wet filled lead acid batteries were being shipped to CleanLites Recycling, Inc., Cincinnati, Ohio, and the date of the last off-site shipment was April 6, 2016. Used oil was being shipped to Clean Harbors Deer Park, LLC, Laporte, Texas (TXD055141378). PCBs were being shipped to Wayne Disposal, Belleville, Michigan

(MID048090633) and asbestos and radioactive contaminated PCBs were being shipped to U.S. DOE in care of National Security Technology, LLC, Mercury, Nevada (NV3890090001). The inspectors reviewed personnel training records for Fluor-BWXT and WEMS employees. The inspectors reviewed a Contingency Plan that was last updated September 16, 2015. In addition, Inspector Francis provided Mr. Newman with five container numbers (#16-001544, #08-001752, #16-000689, #13-003518, and #15-005233. Mr. Newman provided Inspector Francis with the corresponding waste analysis for each container. Mr. Guilliams provided Inspector Francis with an April 12, 2016 letter from U.S. DOE to Ohio EPA regarding a noncompliance report under condition A.22 of the Ohio Hazardous Waste Facility Installation and Operation Permit. Specifically, Fluor-BWXT personnel had determined that universal waste lamps had been stored in Building XT-847 for greater than one year.

Closing Conference

The inspectors conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. U.S. DOE and Fluor-BWXT would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, and completed inspection checklists. Inspector Francis provided a U.S. EPA Small Business Resources information sheet, a U.S. EPA Region 5 Pollution Prevention contact sheet, a U.S. EPA Managing Used Oil Advice for Small Businesses fact sheet, and an Ohio EPA Pollution Prevention Assistance brochure to Mr. Callihan.

Attachments

Inspection Checklists.

RCRA HAZARDOUS WASTE GENERATOR
INSPECTION CHECKLIST

Company: U.S. DOE Portsmouth EPA ID#: OH7 890 008 983

Street: 3930 US Route 23 South City: Piketon

County: Pike State: Ohio Zip: 45661

Mailing Address: Same
(If different from above)

Telephone: _____ Fax #: _____

Owner/ Operator: _____
(If different from above)

Street: _____

City: _____ State: Ohio Zip: _____

Inspection Date(s): 4/12/2016 and 4/13/2016 Time(s): 8:00 am

Inspection Announced? X Yes _____ NO If so, how much advance notice given? 2 Days

	Name	Affiliation	Telephone
Inspectors:	Walt Francis	U.S. EPA	312-353-4921
	Brian Queen	Ohio EPA	740-380-5420
Facility Representative:	Amy Lawson	U.S. DOE	740-897-2112
	Chris Guilliams	FBP	740-897-3863

Complete All Other Applicable Checklists

Generator Classification	Waste Management Activity
_____ Conditionally Exempt SQG (CESQG)	X Containers
_____ Small Quantity Generator (SQG)	_____ Tank(s)
X Large Quantity Generator (LQG)	X Land Disposal Requirements (LDR)
_____ No Generation	X Used Oil
	X Universal Waste
	_____ Other

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

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

NOTE TO THE INSPECTOR

OHIO PART B PERMITTED FACILITY RCRA INSPECTION CHECKLIST			
FACILITY	Portsmouth Gaseous Diffusion Plan	**OHIO PERMIT #**	04-66-0680
STREET ADDRESS	3930 U.S. Route 23 South	**US EPA ID#**	OH7890008983
CITY, STATE AND ZIP	Piketon, OH 45661	**PHONE NUMBER**	740-897-5010
COUNTY	Pike	**INSPECTION DATE**	April 12-13, 2016
Was Advance Notice of Inspection Given?		Yes ☒ No ☐ N/A ☐	
If So, How Far In Advance?		One day	

	NAME	**AGENCY/TITLE**	**PHONE**
INSPECTORS	Walt Francis	U.S. EPA/Environmental Scientist	(312) 353-4921
	Brian Queen	Ohio EPA / Lead Environmental Specialist	(740) 380-5420
FACILITY REPS	Amy Lawson	U.S. DOE/PMP	(740) 897-2112
	Chris Guilliams	Fluor-B&W Portsmouth, LLC/Environmental Support Services Supervisor	(740) 897-3863

Is facility operating as a generator?	Yes
If so, complete the applicable sections of the Generator Requirements checklist for wastes being managed under generator status.	

PERMIT STATUS			
Permit Issued:	March 25, 2011	LDR Checklist Attached:	Yes ☒ No ☐ N/A ☐
Permit Effective Date:	March 25, 2011	Used Oil Checklist Attached:	Yes ☒ No ☐ N/A ☐
Permit Expiration Date:	March 25, 2011	Generator Checklist Attached:	Yes ☒ No ☐ N/A ☐
Permit Renewal Date:			
Permit Modification Date(s):	January 15, 2016	April 5, 2016	
AUTHORIZED ACTIVITIES			

Table of Contents

PROCESS DESCRIPTION 3
WASTE MANAGEMENT, GENERATION AND AMOUNT 3
REGULATORY/ENFORCEMENT HISTORY 3
HAZARDOUS WASTE MANAGEMENT UNITS 4
GENERAL PERMIT COMPLIANCE AND ACTIVITIES 4
PERMIT MODIFICATION, REVISION, REVOCATION 6
SITE ENTRY - AVAILABILITY OF RECORDS 6
RECORDKEEPING/OPERATING REQUIREMENTS 7
OPERATING RECORD 7
DOCUMENTS TO BE MAINTAINED AT FACILITY 7
BIENNIAL REPORT REQUIREMENT 8
SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS 8
WASTE MINIMIZATION REQUIREMENTS 8
WASTE ACCEPTANCE AND GENERATION 9
OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS 9
WASTE ANALYSIS/WASTE ANALYSIS PLAN 10
SECURITY REQUIREMENTS 11
FACILITY OPERATIONS 11
PERSONNEL TRAINING 11
REQUIRED EQUIPMENT 12
CONTINGENCY PLAN - EMERGENCY PROCEDURES 12
EMERGENCY COORDINATOR 13
IMPLEMENTATION OF CONTINGENCY PLAN 14
STORAGE OF HAZARDOUS WASTES IN CONTAINERS 14
CONDITION OF CONTAINERS 14
CONTAINERS - INSPECTIONS 15
CONTAINMENT SYSTEM 15
AISLE SPACE 15

PROCESS DESCRIPTION

Historically, the main function of the DOE-PORTS facility was to enrich uranium for military use (nuclear submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in UF6 feedstock which contains 0.711% U235. In 1993, DOE began leasing the uranium enrichment production and operations facilities at PORTS to the United States Enrichment Corporation (USEC). Uranium was enriched at the site by USEC until May 2001, at which time the production facilities were placed into a cold standby mode. During cold standby, the process buildings were maintained with a restart capability. DOE terminated the cold standby program in September 2005 and replaced it with a cold shutdown program, which no longer maintains the gaseous diffusion restart capability. The PORTS site is owned by DOE and the uranium enrichment facilities are in the process of being transitioned back to DOE from USEC. Ongoing activities at the facility include decontamination and decommissioning of facility buildings, ongoing site environmental restoration, and maintenance of the permitted hazardous waste storage area.

WASTE MANAGEMENT, GENERATION AND AMOUNT

Uranium contaminated hazardous wastes (mixed waste) which were generated by USEC and DOE are stored on-site in DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of TSDs in the U.S. which could accept mixed waste, and a May 1991 DOE moratorium on off-site waste shipment. A large percentage of the waste generated at PORTS is DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in DOE-owned storage areas. During the past year, numerous shipments of hazardous waste were manifested off-site by both DOE and USEC. This is due to an increase in treatment capacity at off-site commercial treatment facilities and DOE treatment facilities, the lifting of the moratorium, and the execution of the site treatment plans for DOE and USEC. DOE has in the past sent some waste off-site (to USDOE Oakridge) for treatment (incineration) prior to final disposal. Treatment residuals had been returned to DOE for storage in the interim prior to their final disposal.

Hazardous

The DOE Part B permit lists numerous hazardous waste codes for wastes that are generated by the above processes and the environmental restoration. These are stored in drums ranging in size from 30 to 110 gallon capacity, 5 gallon containers, 20 gallon lab packs, 5' cans, 4'x4'x6' boxes, 4'x4'x8' boxes, polybottles and laboratory bottles.

Nonhazardous

A wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes.

REGULATORY/ENFORCEMENT HISTORY

As a result of violations of state and federal hazardous waste regulations found during the 1987, 1988, and 1989 OEPA RCRA inspections, USDOE and OEPA entered into a Consent Decree governing restoration of the environment at DOE-PORTS.

On October 4, 1995, DFFOs were signed which allowed DOE to store LDR wastes in excess of one year, so long as waste is being stored in compliance with the orders and an approved site treatment plan. These orders supersede the May 18, 1993, DFFOs. On February 24, 1998, DOE, LMES and Ohio signed DFFOs and a Consent Order regarding past violations and the management of DUF6 and LiOH. This order was amended on March 12, 2004, June 23, 2005, February 22, 2008 and March 28, 2011. The latest amendment added Fluor-B&W Portsmouth, LLC and Babcock & Wilcox Conversion Services, LLC to the order.

On March 18, 1999, DOE and Ohio EPA signed DFFOs. These DFFOs provide exemptions to DOE and integrate the following unclosed units into the CMS/CMI process: X-749, X-231B, X-701C, X701B, X-230J7, and X-744Y.

On April 13, 2010, DOE signed the Director's Final Findings and Orders for Removal Action and Remedial Investigation and Feasibility Study and Remedial Design and Remedial Action (DFF&O). The DFF&O outline the process for decontamination and decommissioning of the facility buildings. A Part B permit was issued to DOE and its current co-operator, Fluor-B&W Portsmouth, LLC, for the X-326 storage facilities on March 25, 2011. The Part B permit was modified on January 15, 2016 in order to add storage areas in buildings X-330, X-345 and X-705.

HAZARDOUS WASTE MANAGEMENT UNITS

Unit Title	Status	Inspected
X-326 Hazardous Waste Container Storage Unit	Operating Permitted Storage Unit	☑
X-330 Hazardous Waste Container Storage Unit	Permitted Storage Unit	☒
X-345 Hazardous Waste Container Storage Unit	Permitted Storage Unit	☒
X-705 Hazardous Waste Container Storage Unit	Permitted Storage Unit	☒
X-744Y Radiological Waste Storage Yard	Closure Completed; Unit Integrated into RCRA Corrective Action Program	☐
X-231B Land Treatment Unit	Corrective Action Completed; Unit Integrated into RCRA Corrective Action Program; Unit in S&M	☐
X-701B Surface Impoundment	Unit Integrated into RCRA Corrective Action Program	☐
X-735 North Landfill	Closure Completed; in Post-Closure Care	☐
X-749 North Landfill	Closure Completed; in Post-Closure Care	☐
X-616 Surface Impoundment	Closure Completed; in Post-Closure Care	☐
X-230J7 Surface Impoundment	Unit Integrated into RCRA Corrective Action Program	☐
X-701C Neutralization Pit	Closure Completed; Unit Integrated into RCRA Corrective Action Program	☐
X-744G Unrestricted Container Storage Unit	Closure Completed	☐
X-744G Restricted Container Storage Unit	Closure Completed	☐
X-752 Hazardous Waste Storage Facility	Closure Completed	☐
X-7725 Container Storage Unit	Closure Completed	☐
X-740 Waste Oil Handling Facility	Closure Completed; Building Removed	☐

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1.	Has the expiration date of the permit passed? If so:		Yes ☐ No ☒ N/A ☐
	A.	Is the permittee continuing any activity regulated by the permit after the expiration date of the permit?	Yes ☐ No ☐ N/A ☐
	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 ☐
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.26]		Yes ☐ No ☐ N/A ☐

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 ☐
4.	Have any provisions of the permit been identified as invalid? [Condition A.4]				Yes ☐ No ☒ N/A ☐
5.	Has the permittee 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:				Yes ☐ No ☒ N/A ☐
	A.	Did the permittee immediately report the following to Ohio EPA's Emergency Response Unit? [Condition A.20]			
		i.	Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and		Yes ☐ No ☐ N/A ☒
		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:		Yes ☐ No ☐ N/A ☒
			a.	Name, address and telephone number of the owner/operator?	Yes ☐ No ☐ N/A ☒
			b.	Name, address and telephone number of the facility?	Yes ☐ No ☐ N/A ☒
			c.	Date, time and type of incident?	Yes ☐ No ☐ N/A ☒
			d.	Name and quantity of material(s) involved?	Yes ☐ No ☐ N/A ☒
			e.	The extent of injuries, if any?	Yes ☐ No ☐ N/A ☒
			f.	An assessment of the actual or potential hazard to the environment and human health outside the facility?	Yes ☐ No ☐ N/A ☒
			g.	Estimated quantity and disposition of recovered material that resulted from the incident?	Yes ☐ No ☐ N/A ☒
6.	Did the permittee provide a written report to Ohio EPA's Emergency Response Unit and DHWM within 5 days of becoming aware of the circumstances reported in Questions No. 5? If so, did the report contain: [Condition A.21] n/a late				Yes ☒ No ☐ N/A ☐
	A.	A description of the noncompliance and its cause (including exact dates and times)?			Yes ☒ No ☐ N/A ☐
	B.	Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? and			Yes ☒ No ☐ N/A ☐
	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 ☐
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 ☐
	A.	Did the permittee report these instances to Ohio EPA, DHWM? [Condition A.22] n/a late			Yes ☒ No ☐ N/A ☐
	B.	Do the reports provided contain the information set forth in Condition A.20? [Condition A.20]			Yes ☒ No ☐ N/A ☐
	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 ☐

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 ☐
	A.	If so, has the permittee provided Ohio EPA with advance notice of such changes? [Condition A.17]	Yes ☐ No ☐ N/A ☑
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? If so:		Yes ☐ No ☑ N/A ☐
	A.	Has the permittee properly submitted such facts or corrected information to the appropriate entity? [Condition A.24]	Yes ☐ No ☐ N/A ☒
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 ☐
11.	Has the permit, been transferred to a new owner/operator? If so: FBP		Yes ☐ No ☒ N/A ☐
	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 ☒
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 ☐
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 ☐
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 ☐
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.14c]		Yes ☒ No ☐ N/A ☐
16.	Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14c]		Yes ☒ No ☐ N/A ☐
17.	Is the permittee planning any physical alterations or additions to any permitted portions of the facility? If so:		Yes ☐ No ☒ N/A ☐
	A.	Has the permittee given notice to the director of such alterations/additions? [Condition A.15]	Yes ☐ No ☐ N/A ☑
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 ☐
	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 ☐
	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 ☐

	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 ☐
RECORDKEEPING/OPERATING REQUIREMENTS			
OPERATING RECORD			
19.	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:		Yes ☒ No ☐ N/A ☐
	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 ☐
	B.	The location of each hazardous waste and quantity at each location including cross-reference to specific manifest numbers?	Yes ☒ No ☐ N/A ☐
	C.	Records and results of required waste analysis?	Yes ☒ No ☐ N/A ☐
	D.	Summary reports and details of all incidents that required implementation of the contingency plan?	Yes ☒ No ☐ N/A ☐
	E.	Records and results of required inspections?	Yes ☒ No ☐ N/A ☐
	F.	Documents required to be maintained by LDR requirements of OAC Chapter 3745-270?	Yes ☒ No ☐ N/A ☐
	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 ☐
DOCUMENTS TO BE MAINTAINED AT FACILITY			
20.	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 ☐
	B.	Contingency plan in accordance with OAC rule 3745-54-53? updated 9/16/15 11/9/15	Yes ☒ No ☐ N/A ☐
	C.	Personnel training plan and records required by OAC rule 3745-54-16(E)? [Condition B.6]	Yes ☒ No ☐ N/A ☐
	D.	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 ☐
	E.	Operating record in accordance with OAC rule 3745-54-73? [Condition B.22]	Yes ☒ No ☐ N/A ☐
21.	Is the permittee maintaining copies of all inspection logs at the facility for a period of at least 3 years from date of inspection? [Condition B.5]		Yes ☒ No ☐ N/A ☐
22.	Have any of the documents in Question No. 20 been revised? [Condition A.15] If so:		Yes ☒ No ☐ N/A ☐
	A.	Has the permittee submitted the revisions to Ohio EPA in accordance with OAC rule 3745-50-51?	Yes ☒ No ☐ N/A ☐
	B.	Have all requirements of OAC rule 3745-50-51 been met, including, where required, Ohio EPA approval?	Yes ☒ No ☐ N/A ☐

BIENNIAL REPORT REQUIREMENT			
23.	Is the permittee complying with biennial 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 ☐
SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS			
24.	In compliance with Condition A.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 ☐
	B.	Individual(s) who performed the sampling or measurement?	Yes ☒ No ☐ N/A ☐
	C.	Date(s) analyses were performed?	Yes ☒ No ☐ N/A ☐
	D.	Individual(s) who performed the analyses?	Yes ☒ No ☐ N/A ☐
	E.	Analytical technique(s) or method(s) used?	Yes ☒ No ☐ N/A ☐
	F.	Results of such analyses?	Yes ☒ No ☐ N/A ☐
25.	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 A.12(a)]		Yes ☒ No ☐ N/A ☐
26.	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 3 years from the date of sampling, including:		
	A.	All calibration and maintenance records?	Yes ☒ No ☐ N/A ☐
27.	Has Ohio EPA requested submittal of any reports or other information from the permittee? If so:		Yes ☒ No ☐ N/A ☐
	A.	Have the submittals been signed and certified according to OAC rule 3745-50-42? [Condition A.13]	Yes ☒ No ☐ N/A ☐
WASTE MINIMIZATION REQUIREMENTS			
28.	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) of the permit and OAC rule 3745-54-73(B)(9)?		Yes ☒ No ☐ N/A ☐
29.	Did the permittee submit the waste minimization report to Ohio EPA, Office of Compliance Assistance & Pollution Prevention and South District Office within 180 days of journalization of this permit and updates every five years thereafter? [Condition A 29]		Yes ☒ No ☐ N/A ☐
30.	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 ☐
31.	Has the permittee saved money this year by implementing pollution prevention (reducing raw material usage, disposal fees, energy savings, etc.)?		Yes ☒ No ☐ N/A ☐
NOTE: If this facility is inspected two times a year, the information obtained in Questions 28 through 31 only needs to be collected one time for the calendar year.			

WASTE ACCEPTANCE AND GENERATION			
32.		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 ☐
33.		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 ☐
34.		Has the permittee notified the regional administrator of U.S. EPA 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(b)]	Yes ☐ No ☐ N/A ☒
OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS			
35.		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 ☐
	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 ☐
	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 ☐
	D.	Prepared manifests have been signed by the permittee and initial transporter in compliance with OAC rule 3745-52-23?	Yes ☒ No ☐ N/A ☐
36.		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 3 years at the facility as required by OAC rules 3745-52-40 and 3745-54-71(A)(2)(e)?	Yes ☒ No ☐ N/A ☐
NOTE: If the permittee is generating hazardous waste, remember to attach a complete generator checklist.			
37.		Does the permittee use only properly registered transporters when removing hazardous wastes? [Condition A.16]	Yes ☒ No ☐ N/A ☐
38.		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 3 years? [3745-54-71(A)(2)(c)(d)(e)]	Yes ☒ No ☐ N/A ☐
	A.	If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met? [3745-54-71(B)(3)(4)(5)]	Yes ☑ No ☐ N/A ☐
	B.	Are any significant discrepancies in the manifest, as defined in OAC rule 3745-54-72(A) and (B) noted in writing on the manifest or shipping paper? [3745-54-71(A)(2)(b)] & [3745-54-71(B)(2)]	Yes ☒ No ☐ N/A ☐
39.		Does the permittee send a hazardous waste shipment to a consignment state (*i.e.*, the state in which the hazardous waste shipment will be transported and subsequently managed)? If so:	Yes ☒ No ☐ N/A ☐
	A.	Has the permittee determined whether the consignment state for a shipment regulates any additional wastes (beyond those regulated federally) as hazardous wastes under its state hazardous waste program? [3745-54-71(E)]	Yes ☒ No ☐ N/A ☐
	B.	Has the permittee determined whether the consignment state requires the permittee to submit any copies of the manifest to the state? [3745-54-71(E)]	Yes ☒ No ☐ N/A ☐
40.		If the permittee 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 OAC rule 3745-54-76(A) been submitted to the director within 15 days?	Yes ☐ No ☐ N/A ☒

WASTE ANALYSIS/WASTE ANALYSIS PLAN			
41.		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, 3745-205 and 3745-270 and the terms and conditions of the permit? [Condition B.3]	Yes ☒ No ☐ N/A ☐
42.		Does the permittee follow the procedures described in the WAP (Section C-2E of the approved permit application)? [Condition B.3]	Yes ☒ No ☐ N/A ☐
43.		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? [Condition B.3]	Yes ☒ No ☐ N/A ☐
44.		**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(C)]?	Yes ☒ No ☐ N/A ☐
45.		**FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER OAC rule 3745-270-04(A):**	
		Does the waste analysis plan include procedures and schedules for:	
	A.	The sampling of impoundment contents? [3745-54-13(B)(7)]	Yes ☐ No ☐ N/A ☐
	B.	The analysis of test data? [3745-65-13(B)(7)]	Yes ☐ No ☐ N/A ☐
	C.	The annual removal of residues which are not delisted or which exhibit the characteristic of a hazardous waste and either does not meet treatment standards (OAC rules 3745-270-40 to 3745-270-49) or where no treatment standards have been established? [3745-54-13(B)(7)]	Yes ☐ No ☐ N/A ☐
46.		**Where applicable:** The methods which will be used to meet additional waste analysis requirements for specific waste management methods specified in OAC rules 3745-54-17, 3745-57-14, 3745-57-41 and 3745-270-07? [3745-54-13(B)(6)]	Yes ☒ No ☐ N/A ☐
47.		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 ☐
48.		Is the permittee following the inspection procedures and schedules as set forth in the permit (Section F of the approved permit application) and the requirements of OAC rules 3745-54-15(A),(C) and (D)? [Condition B.5]	Yes ☒ No ☐ N/A ☐
49.		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 ☐
	A.	Is the schedule kept at the facility? [3745-54-15(B)(2)]	Yes ☒ No ☐ N/A ☐
50.		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 ☐
51.		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? (all given + T—)	Yes ☒ No ☐ N/A ☐
	B.	Name of inspector?	Yes ☒ No ☐ N/A ☐
	C.	Notation of observations made?	Yes ☒ No ☐ N/A ☐

	D.	Date and nature of any repairs or other remedial actions?	Yes ☒ No ☐ N/A ☐
SECURITY REQUIREMENTS			
52.	Is the permittee complying with the following security provisions of OAC rule 3745-54-14 and Condition B.4 of the permit: [Section F of the approved 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 ☐
	B.	An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility?	Yes ☒ No ☐ N/A ☐
	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 ☐
53.	In accordance with OAC rule 3745-54-14(C), does the permittee have signs reading "Danger - Unauthorized Personnel Keep Out" posted at entrances of the hazardous waste container storage building number X-326, X330, X345 and X-705?		Yes ☒ No ☐ N/A ☐
FACILITY OPERATIONS			
54.	Are 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? [3745-54-31 and Condition B.1]		Yes ☒ No ☐ N/A ☐
55.	Does the permittee properly maintain and operate the facility to achieve compliance with the terms and conditions of the permit including: [Condition A.9]		Yes ☒ No ☐ N/A ☐
	A.	Effective management practices?	Yes ☒ No ☐ N/A ☐
	B.	Adequate funding?	Yes ☒ No ☐ N/A ☐
	C.	Adequate operator staffing and training?	Yes ☒ No ☐ N/A ☐
	D.	Adequate laboratory and process controls?	Yes ☒ No ☐ N/A ☐
PERSONNEL TRAINING			
56.	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 ☐
	A.	Does the permittee provide personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [3745-54-16(A)(B)(C)]	Yes ☒ No ☐ N/A ☐
	B.	Does the permittee provide 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 ☐
	C.	Does the permittee provide refresher training as required by OAC rule 3745-54-16(C)?	Yes ☒ No ☐ N/A ☐
NOTE: Facility personnel must take part in refresher training during each period from January 1st to December 31st. Each training must occur within 15 months after the previous training. [3745-54-16(C)]			
57.	Is the permittee maintaining personnel training records as required by OAC rule 3745-54-16(D) and Section H of the approved permit application, including: written job titles, job descriptions and documented employee training records? [Condition B.6]		Yes ☒ No ☐ N/A ☐

FB P + WPMS

REQUIRED EQUIPMENT			
NOTE: Inspector may attach a list of emergency equipment. If so, the attachment document is referenced as Appendix __.			
58.	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 ☐
	B.	A device such as a telephone which is capable of summoning emergency assistance from local emergency authorities?	Yes ☒ No ☐ N/A ☐
	C.	Portable fire extinguishers and/or fire control equipment, spill control and decontamination equipment?	Yes ☒ No ☐ N/A ☐
	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 ☐
59.	Is the permittee inspecting, testing and maintaining the equipment specified in Question No. 63 to ensure its proper operating in accordance with OAC rule 3745-54-33 and Condition B.10 of the permit?		Yes ☒ No ☐ N/A ☐
60.	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 ☐
CONTINGENCY PLAN - EMERGENCY PROCEDURES			
61.	In compliance with Condition B.13 of the permit and OAC rule 3745-54-37(A), does the permittee: 9/16/15 Revised 11/9/15		
	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 ☐
	B.	Inform such agencies of safety equipment, supplies, proper emergency safety procedures that are applicable to the facility?	Yes ☒ No ☐ N/A ☐
	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 ☐
62.	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 ☐
	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 ☒
63.	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 ☐
64.	Has the permittee notified all parties identified in the contingency plan in writing of amendments, modifications, or revisions to the plan within 10 days of the effective date of the change in the plan? [Condition B.18(b)]		Yes ☒ No ☐ N/A ☐
65.	Has the permittee submitted a copy of the approved contingency plan and all revisions, amendments and modifications to the Ohio EPA, Division of Environmental Response and Revitalization (DERR) in accordance with OAC rule 3745-54-53? [Condition B 18(c)]		Yes ☒ No ☐ N/A ☐
66.	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 ☐
NOTE: Also see Question 22 to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.			

EMERGENCY COORDINATOR			
67.	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 ☐
68.	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:		Yes ☒ No ☐ N/A ☐
	A.	Contingency plan? - Steven Hay	Yes ☒ No ☐ N/A ☐
	B.	Facility operations/activities?	Yes ☒ No ☐ N/A ☐
	C.	Waste characterization and location?	Yes ☒ No ☐ N/A ☐
	D.	Location of all records in the facility?	Yes ☒ No ☐ N/A ☐
	E.	Facility layout?	Yes ☒ No ☐ N/A ☐
69.	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? [Condition B.19]		Yes ☒ No ☐ N/A ☐
70.	Does the permittee have a contingency plan for the facility that: [Condition B.15]		
	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 ☐
	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 ☐
	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 ☐
	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 ☐
	E.	Includes the location and a physical description of each item on the list referenced in Question No. 75(d), and a brief outline of its capabilities?	Yes ☒ No ☐ N/A ☐
	F.	Includes an evacuation 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 ☐

NOTE: If the permittee already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or some other emergency plan, the permittee can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The permittee may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-54-52(B)]

IMPLEMENTATION OF CONTINGENCY PLAN				
71.	Has there been a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment since the date of the last inspection? If so:			Yes ☐ No ☒ N/A ☐
NOTE: Example scenarios that could be threats to human health or the environment are provided in a DHWM guidance document on "Contingency Plan Implementation and Incident Reporting Under Ohio Hazardous Waste Rules" at: http://epa.ohio.gov/portals/32/pdf/Contingency_Plan_and_Incident_Reporting.pdf. Facility specific scenarios are included in the permittee's contingency plan.				
	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 ☐
	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: [3745-54-56(D)(2)]		
		i.	Name and telephone number of the reporter?	Yes ☐ No ☐ N/A ☐
		ii.	Name and address of the facility?	Yes ☐ No ☐ N/A ☐
		iii.	Time and type of incident?	Yes ☐ No ☐ N/A ☐
		iv.	Name and quantity of materials involved?	Yes ☐ No ☐ N/A ☐
		v.	The extent of injuries?	Yes ☐ No ☐ N/A ☐
		vi.	The possible hazards to human health or the environment outside the facility?	Yes ☐ No ☐ N/A ☐
	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 ☐
	D.	Within 15 days after the incident did the permittee submit to the director a written report of the incident? If so:		Yes ☐ No ☐ N/A ☐
		i.	Did the report contain the elements set forth in OAC rule 3745-54-56(I)? [Condition B.23]	Yes ☐ No ☐ N/A ☐
	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(I)? [Condition B.23]		Yes ☐ No ☐ N/A ☐
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				
72.	Are containers holding hazardous wastes in good condition as required by OAC 3745-55-71? [Condition C.3] If not:			Yes ☒ No ☐ N/A ☐
	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 C.3]		Yes ☒ No ☐ N/A ☐

73.	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 C.4]		Yes ☒ No ☐ N/A ☐
74.	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 C.5(b)]		Yes ☒ No ☐ N/A ☐
CONTAINERS - INSPECTIONS			
NOTE: Inspector may attach a container inspection checklist. If so, the attached document is referenced as Appendix___.			
75.	Is the permittee inspecting the container area at least once during the period from Sunday to Saturday in accordance with OAC rule 3745-55-74 and the approved inspection schedule in Section D 1A(2) of the approved permit application to detect leaking containers and deterioration of containers and the containment system? [Condition C.8]		Yes ☒ No ☐ N/A ☐
	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 ☐
CONTAINMENT SYSTEM			
76.	Does the permittee maintain the containment system as described in Section D of the approved permit application, including: [Condition C.6]		Yes ☒ No ☐ N/A ☐
	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 ☐
	B.	A system which is free of gaps and sufficiently impervious to contain leaks and spills?	Yes ☒ No ☐ N/A ☐
77.	Has the permittee had a spill or leak of wastes? If so:		Yes ☐ No ☒ N/A ☐
	A.	Was spilled or leaked waste removed in a timely manner? [Condition C.6(c)]	Yes ☐ No ☐ N/A ☒
NOTE: This time period is not to exceed 24 hours. [Condition C.6(c)			
AISLE SPACE			
78.	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 ☐

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

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

Safety Equipment Used:

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]		Yes ☒ No ☐ N/A ☐
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]		Yes ☒ No ☐ N/A ☐
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]		Yes ☒ No ☐ N/A ☐
4.	Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)]		Yes ☒ No ☐ N/A ☐
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]		Yes ☒ No ☐ N/A ☐
6.	Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]		Yes ☐ No ☒ N/A ☐
7.	Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]		Yes ☐ No ☒ N/A ☐
8.	Does the generator accumulate hazardous waste?		Yes ☒ No ☐ N/A ☐
NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.			
9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?		Yes ☐ No ☒ N/A ☐
NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).			
10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]		
	a.	Container that meets 3745-66-70 to 3745-66-77?	Yes ☐ No ☒ N/A ☐
	b.	Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	Yes ☐ No ☒ N/A ☐
	c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes ☐ No ☒ N/A ☐
	d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes ☐ No ☒ N/A ☐
NOTE: Complete appropriate checklist for each unit.			
NOTE: If waste is treated to meet LDRs, use LDR checklist.			
11.	Does the generator export hazardous waste? If so:		Yes ☐ No ☒ N/A ☐
	a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes ☐ No ☐ N/A ☐
	b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes ☐ No ☐ N/A ☐
	c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes ☐ No ☐ N/A ☐
	d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes ☐ No ☐ N/A ☐

	e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes ☐ No ☐ N/A ☒
MANIFEST REQUIREMENTS			
12.		Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes ☒ No ☐ N/A ☐
13.		Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes ☒ No ☐ N/A ☐
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]			
14.		Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes ☒ No ☐ N/A ☐
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]			
15.		If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes ☐ No ☐ N/A ☒
16.		Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes ☒ No ☐ N/A ☐
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.			
17.		If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	Yes ☐ No ☐ N/A ☒
18.		If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes ☐ No ☐ N/A ☒
19.		If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes ☐ No ☐ N/A ☒
20.		Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes ☒ No ☐ N/A ☐
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.			
PERSONNEL TRAINING			
21.		Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes ☒ No ☐ N/A ☐
22.		Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)]	Yes ☒ No ☐ N/A ☐
NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]			
23.		Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes ☒ No ☐ N/A ☐
24.		Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes ☒ No ☐ N/A ☐
25.		Does the generator provide annual refresher training to employees? [3745-65-16(C)]	Yes ☒ No ☐ N/A ☐

26.	Does the generator keep records and documentation of.		
	a.	Job titles? [3745-65-16(D)(1)]	Yes ☒ No ☐ N/A ☐
	b.	Job descriptions? [3745-65-16(D)(2)]	Yes ☒ No ☐ N/A ☐
	c.	Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes ☒ No ☐ N/A ☐
	d.	Completed training or job experience required? [3745-65-16(D)(4)]	Yes ☒ No ☐ N/A ☐
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]		Yes ☒ No ☐ N/A ☐

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the -job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained
Env. Prot. Engineer	Ryan Callihan	7/21/15, 10/14/14
Waste Management Field Sem	Brandon Fosson	12/3/14, 12/1/15
Waste Management Field Sem	Vickie Glenn	9/23/15, 9/23/16

CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]		Yes ☒ No ☐ N/A ☐
29.	Does the plan describe the following:		
	a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes ☒ No ☐ N/A ☐
	b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes ☒ No ☐ N/A ☐
	c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes ☒ No ☐ N/A ☐
	d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes ☒ No ☐ N/A ☐
	e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes ☒ No ☐ N/A ☐

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]	Yes ☒ No ☐ N/A ☐
31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes ☒ No ☐ N/A ☐
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes ☒ No ☐ N/A ☐

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

EMERGENCY PROCEDURES			
33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:		Yes ☐ No ☒ N/A ☐
	a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes ☐ No ☐ N/A ☐
	b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes ☐ No ☐ N/A ☐
	c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)?	Yes ☐ No ☐ N/A ☐
NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.			
PREPAREDNESS AND PREVENTION			
34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]		Yes ☒ No ☐ N/A ☐
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:		
	a.	Internal communications or alarm system? [3745-65-32(A)]	Yes ☒ No ☐ N/A ☐
	b.	Emergency communication device? [3745-65-32(B)]	Yes ☒ No ☐ N/A ☐
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes ☒ No ☐ N/A ☐
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes ☒ No ☐ N/A ☐
NOTE: Verify that the equipment is listed in the contingency plan.			
36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]		Yes ☒ No ☐ N/A ☐
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]		Yes ☒ No ☐ N/A ☐
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]		Yes ☒ No ☐ N/A ☐
39.	If there is only one employee on the premises, is there immediate access to a device (eg., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]		Yes ☒ No ☐ N/A ☐
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]		Yes ☒ No ☐ N/A ☐
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]		Yes ☒ No ☐ N/A ☐
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]		Yes ☐ No ☐ N/A ☒
SATELLITE ACCUMULATION AREA REQUIREMENTS			
43.	Does the generator ensure that satellite accumulation area(s):		
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐

	e	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes ☒ No ☐ N/A ☐
	f	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes ☒ No ☐ N/A ☐
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:		Yes ☐ No ☒ N/A ☐
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes ☒ No ☐ N/A ☐
	b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less then 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.			
USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS			
45.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]		Yes ☒ No ☐ N/A ☐
46.	Is the accumulation date on each container? [3745-52-34(A)(2)]		Yes ☒ No ☐ N/A ☐
47.	Are hazardous wastes stored in containers which are:		
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes ☒ No ☐ N/A ☐
	b.	In good condition? [3745-66-71]	Yes ☒ No ☐ N/A ☐
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes ☒ No ☐ N/A ☐
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes ☒ No ☐ N/A ☐
NOTE: Record location on process summary sheets, photograph the area, and record on facility map.			
48.	Is the container accumulation areas(s) inspected weekly? [3745-66-74]		Yes ☒ No ☐ N/A ☐
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes ☒ No ☐ N/A ☐
NOTE: "Week" means 7 consecutive days per ORC§1.44(A).			
49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]		Yes ☒ No ☐ N/A ☐
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]		Yes ☒ No ☐ N/A ☐
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]		Yes ☒ No ☐ N/A ☐
52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]		Yes ☐ No ☐ N/A ☒
NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.			
53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]		Yes ☐ No ☐ N/A ☒

NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]		
PRE-TRANSPORT REQUIREMENTS		
54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes ☒ No ☐ N/A ☐
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes ☒ No ☐ N/A ☐
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes ☒ No ☐ N/A ☐

GENERATOR LDR CHECKLIST DOES NOT APPLY TO CESQGS				
GENERAL REQUIREMENTS				
1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07(A)(7)]			Yes ☐ No ☐ N/A ☒
2	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not,			Yes ☒ No ☐ N/A ☐
	a.	Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)]		Yes ☒ No ☐ N/A ☐
NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).				
3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]			Yes ☒ No ☐ N/A ☐
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]			Yes ☒ No ☐ N/A ☐
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,			Yes ☒ No ☐ N/A ☐
	a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]		Yes ☒ No ☐ N/A ☐
FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.				
6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]			Yes ☒ No ☐ N/A ☐
NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.				
NOTE: Written documentation of this determination is not required.				
7.	Did the generator treat his HW /soil on-site to meet the LDR treatment standard?			Yes ☐ No ☐ N/A ☒
NOTE: If "Yes" see question #16.				
8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)]			Yes ☒ No ☐ N/A ☐
	a.	If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include:		Yes ☒ No ☐ N/A ☐
		i	Applicable HW codes?	Yes ☒ No ☐ N/A ☐
		ii	Manifest number of the first shipment to the TSD?	Yes ☒ No ☐ N/A ☐
		iii	A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination."?	Yes ☒ No ☐ N/A ☐
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]			Yes ☒ No ☐ N/A ☐
10.	Does the generator have a copy of the LDR notification form/notice on file? [3745-270-07(A)(2)]			Yes ☒ No ☐ N/A ☐

	a.	Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes ☒ No ☐ N/A ☐
NOTIFICATION FORM			
11.	Does the LDR Notification form contain the following information:		
	a.	Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes ■ No ☐ N/A ☐
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.			
	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories			
	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.			
	g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.			
PROHIBITED DILUTION			
12.	Is the HW treated by burning? If "No" go to #15.		Yes ☐ No ☒ N/A ☐
13.	Is the HW a metal-bearing HW?		Yes ☒ No ☐ N/A ☐
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.			
14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless **one** of the following conditions apply. [3745-270-03(c)]	
		i. Contains > 1% TOC?	Yes ☐ No ☐ N/A ☐
		ii. Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes ☐ No ☐ N/A ☐
		iii. Is made up of combustible material e.g., paper, wood, plastic?	Yes ☐ No ☐ N/A ☐
		iv. Has a reasonable heating value (e.g., > 5000 Btu)?	Yes ☐ No ☐ N/A ☐
		v. Co-generated with a HW that must be combusted?	Yes ☐ No ☐ N/A ☐
	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes ☐ No ☐ N/A ☐

15	Was the HW treated by wastewater treatment?			Yes ☐ No ☒ N/A ☐
	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]		Yes ☒ No ☒ N/A ☐
NOTE: If "Yes", HW is improperly being treated by dilution.				
	b.	Does the waste carry the D001 code and contain ≥10% TOC?		Yes ☐ No ☐ N/A ☒
	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?		Yes ☐ No ☐ N/A ☒
NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].				
NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.				
GENERATOR TREATMENT				
16.	Does the generator treat to meet LDRs on-site?			Yes ☐ No ☒ N/A ☐
	Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?			Yes ☐ No ☐ N/A ☐
	If "Yes"...complete the rest of the checklist. If "No"...stop...you are done.			
	a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]		Yes ☐ No ☐ N/A ☐
	b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]		Yes ☐ No ☐ N/A ☐
NOTE: This is a laboratory analysis but it does not have to be kept by the generator.				
	c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]		Yes ☒ No ☐ N/A ☐
	d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]		Yes ☒ No ☐ N/A ☐
	e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]		Yes ☒ No ☐ N/A ☐
	f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]		Yes ☒ No ☐ N/A ☐
NOTIFICATION FORM FOR GENERATOR TREATMENT				
17.	a.	Contains all information in #11 a-g above and		Yes ☒ No ☐ N/A ☐
	b.	If the treated HW/soil is listed.....notification contains the following certification statement: "I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."		Yes ☐ No ☐ N/A ☒
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:		
		i	Prepare a one-time notification? [3745-270-09 (D)]	Yes ☐ No ☐ N/A ☒
		ii	Maintain a copy of the notice onsite? [3745-270-09(D)]	Yes ☐ No ☐ N/A ☒
		iii.	Include in the notification: [3745-270-09(D)]	

			1.	Name & address of receiving landfill?	Yes ☐ No ☐ N/A ☐
			2.	Description of HW when generated?	Yes ☐ No ☐ N/A ☐
			3.	HW code when generated?	Yes ☐ No ☐ N/A ☐
			4.	Treatability group when generated?	Yes ☐ No ☐ N/A ☐
			5.	Underlying hazardous constituents present when generated?	Yes ☐ No ☐ N/A ☐
		iv.	Contain the certification statement as required by 3745-270-07(B)(4)?		Yes ☐ No ☐ N/A ☐

LARGE QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS			
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more			
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less			
GENERAL REQUIREMENTS			
1	Has the LQUWH obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)]	Yes ☒ No ☐ N/A ☐	
PROHIBITIONS			
2	Did the LQUWH dispose of universal waste? [3745-273-31(A)]	Yes ☐ No ☒ N/A ☐	
3.	Did the LQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-37 or managing specific wastes as provided in OAC rule 3745-273-33? [3745-273-31(B)]	Yes ☐ No ☒ N/A ☐	
WASTE MANAGEMENT AND LABELING/MARKING			
UNIVERSAL WASTE BATTERIES			
4.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)]	Yes ☒ No ☐ N/A ☐	
5.	If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(A)(1)]	Yes ☒ No ☐ N/A ☐	
6.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-33(A)]	Yes ☐ No ☒ N/A ☐	
7.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)(3)]	Yes ☒ No ☐ N/A ☐	
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)(a)]	Yes ☒ No ☐ N/A ☐	
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)]	Yes ☐ No ☐ N/A ☒	
8.	Are the batteries or containers of batteries labeled with the words "Universal Waste-Batteries" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-34(A)]	Yes ☒ No ☐ N/A ☐	
UNIVERSAL WASTE PESTICIDES			
9.	Does the LQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-33(B)(1)]	Yes ☐ No ☐ N/A ☐	
10.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-33(B)(2)]	Yes ☐ No ☐ N/A ☐	
11.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97, of the OAC met? [3745-273-33(B)(3)]	Yes ☐ No ☐ N/A ☐	
12.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-33(B)(4)]	Yes ☐ No ☐ N/A ☐	
13.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste-Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)]	Yes ☐ No ☐ N/A ☐	
14.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste-Pesticides" or "Waste Pesticides?" [3745-273-34(C)(1)&(2)]	Yes ☐ No ☐ N/A ☐	

UNIVERSAL WASTE MERCURY-CONTAINING EQUIPMENT			
15.		Has mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage or damage that could cause leaks been placed in a container that is closed, structurally sound, compatible with contents of the device and lacks evidence of leakage, spillage or damage that could cause leakage and is designed to prevent escape of mercury into the environment by volatilization or any other means? [3745-273-33(C)(1)]	Yes ☒ No ☐ N/A ☐
16.		If the mercury-containing ampules are removed, does the LQUWH. [3745-273-33(C)(2)]	
	a.	Remove and manage the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-33(C)(2)(a)&(b)]	Yes ☒ No ☐ N/A ☐
	b.	Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-33(C)(2)(c)&(d)]	Yes ☒ No ☐ N/A ☐
	c.	Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-33(C)(2)(e)]	Yes ☒ No ☐ N/A ☐
	d.	Ensure that employees are thoroughly familiar with proper waste handling and emergency procedures? [3745-273-33(C)(2)(f)]	Yes ☒ No ☐ N/A ☐
	e.	Ensure removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-33(C)(2)(g)]	Yes ☒ No ☐ N/A ☐
	f.	Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-33(C)(2)(h)]	Yes ☒ No ☐ N/A ☐
17.		If the open original housing holding mercury is removed from a mercury-containing equipment that does not contain an ampule, does the LQUWH: [3745-273-33(C)(3)]	Yes ☒ No ☐ N/A ☐
	a.	Immediately seal the original housing holding the mercury with an air-tight seal to prevent the release of any mercury to the environment? [3745-273-33(C)(3)(a)]	Yes ☒ No ☐ N/A ☐
	b.	Follow all requirements for removing ampules and managing removed ampules in accordance with 3745-273-33(C)(2)? [3745-273-33(C)(3)(b)]	Yes ☒ No ☐ N/A ☐
18.		When removing mercury containing ampules from mercury-containing equipment or sealing mercury from its original housing if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining mercury-containing device), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-33(C)(4)(a)]	Yes ☒ No ☐ N/A ☐
	a.	If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-33(C)(4)(b)]	Yes ☒ No ☐ N/A ☐
19.		Is mercury-containing equipment or containers of mercury-containing equipment labelled either "Universal Waste-Mercury-Containing Equipment" or "Waste Mercury-Containing Equipment" or "Used Mercury-Containing Equipment"? [3745-237-34(D)(1)]	Yes ☒ No ☐ N/A ☐
20.		Are mercury-containing thermostats or containers containing ONLY thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)?" [3745-273-34(D)(2)]	Yes ☒ No ☐ N/A ☐

UNIVERSAL WASTE LAMPS		
21.	Does the LQUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(D)(1)]	Yes ☒ No ☐ N/A ☐
22.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous constituents to the environment? [3745-273-33(D)(2)]	Yes ☒ No ☐ N/A ☐
*NOTE: **Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)].** A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.*		
23.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamps?" [3745-273-34(E)]	Yes ☒ No ☐ N/A ☐
ACCUMULATION TIME		
24.	Is the waste accumulated for less than one year? [3745-273-35(A)]	Yes ☒ No ☒ N/A ☐
	a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate.) [3745-273-35(B)]	Yes ☐ No ☒ N/A ☐
NOTE: Accumulation is defined as date generated or date received from another handler.		
25.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-35(C)] If yes, describe below: Letter to Ohio EPA 4/12/16 Lamps 11/14/14 2/15/15 11/14/14 3/5/15	Yes ☒ No ☐ N/A ☐
EMPLOYEE TRAINING		
26.	Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36]	Yes ☒ No ☐ N/A ☐
RESPONSE TO RELEASES		
27.	Are releases of universal waste and other residues immediately contained? [3745-273-37(A)]	Yes ☒ No ☐ N/A ☐
28.	Is the material released characterized? [3745-273-37(B)]	Yes ☒ No ☐ N/A ☐
29.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-37(B)]	Yes ☒ No ☐ N/A ☐
OFF-SITE SHIPMENTS		
NOTE: If a LQUWH self-transports wastes, then the handler must comply with the Universal Waste transporter requirements.		
30.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)] Clean Lines, Concerning Other	Yes ☒ No ☐ N/A ☐
31.	Is the handler aware of DOT requirements for packaging and shipping?	Yes ☒ No ☐ N/A ☐

	If not, make aware of 40 CFR 171-180.		
32.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)]		Yes ☒ No ☐ N/A ☐
33.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?		Yes ☐ No ☒ N/A ☐
	a.	If yes, did the originating handler receive the waste back or agree to where shipment was sent? [3745-273-38(E)]	Yes ☐ No ☐ N/A ☐
34.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler to discuss and do one of the following:		Yes ☐ No ☐ N/A ☐
	a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-38(F)]	Yes ☐ No ☐ N/A ☐
35.	If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)]		Yes ☐ No ☐ N/A ☐
TRACKING UNIVERSAL WASTE SHIPMENTS			
36.	Are universal wastes received from another handler? If so:		Yes ☐ No ☒ N/A ☐
	a.	Is a record (log, invoice, manifest, bill of lading, or other shipping document) of each shipment kept? [3745-273-39(A)]	Yes ☐ No ☐ N/A ☐
37.	Does the record include the following:		
	a.	Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)]	Yes ☐ No ☐ N/A ☐
	b.	Quantity of each type of universal waste? [3745-273-39(A)(2)]	Yes ☐ No ☐ N/A ☐
	c.	Date received? [3745-273-39(A)(3)]	Yes ☐ No ☐ N/A ☐
38	Is universal waste shipped to another handler? If so:		Yes ☐ No ☐ N/A ☐
	a.	Is a record of each shipment kept? [3745-273-39(B)]	Yes ☐ No ☐ N/A ☐
39.	Does the record include the following?		
	a.	Name and address of universal waste handler, destination facility, or foreign destination? [3745-273-39(B)(1)]	Yes ☐ No ☐ N/A ☐
	b.	Quantity of each type of universal waste? [3745-273-39(B)(2)]	Yes ☐ No ☐ N/A ☐
	c.	Date shipped? [3745-273-39(B)(3)]	Yes ☐ No ☐ N/A ☐
40.	Are records kept for three years? [3745-273-39(C)(1)&(2)]		Yes ☐ No ☐ N/A ☐
EXPORTS			
41.	Is waste being sent to a foreign destination? If so:		Yes ☐ No ☒ N/A ☐
	a.	Does the large quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56 and 3745-52-57? [3745-273-40(A)]	Yes ☐ No ☐ N/A ☐
	b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-40(B)]	Yes ☐ No ☐ N/A ☐
	c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)]	Yes ☐ No ☐ N/A ☐

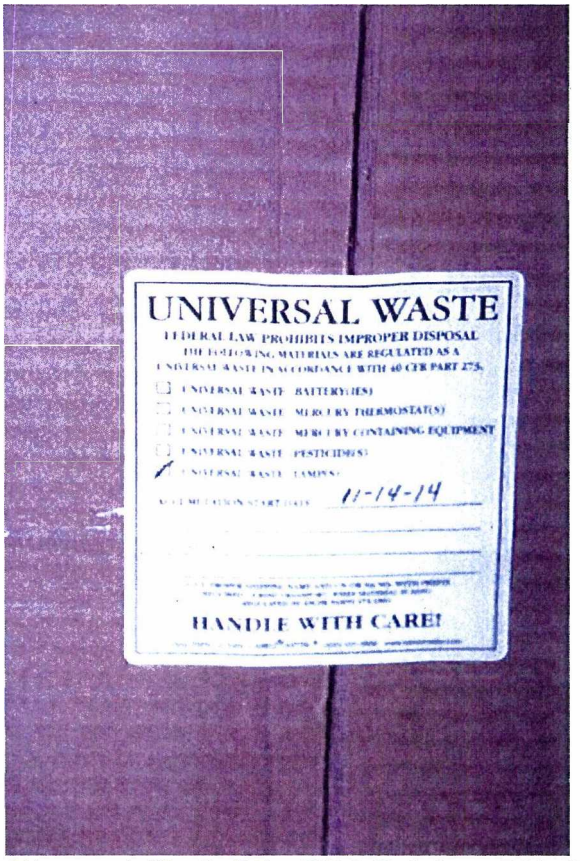
USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS			
1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:		Yes ☐ No ☒ N/A ☐
	a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes ☐ No ☐ N/A ☒
NOTE: For example, used oil contaminated scrap metal stored in a pile.			
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]		Yes ☐ No ☒ N/A ☐
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?		Yes ☐ No ☒ N/A ☐
NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).			
GENERATOR STANDARDS			
4.	Does the generator mix hazardous waste with used oil? If so,		Yes ☐ No ☒ N/A ☐
	a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes ☐ No ☐ N/A ☒
NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.			
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 ☒
NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.			
6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]		Yes ☐ No ☒ N/A ☐
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 ☐
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 ☐
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]		Yes ☒ No ☐ N/A ☐
	a.	Stopped the release?	Yes ☒ No ☐ N/A ☐
	b.	Contained the release?	Yes ☒ No ☐ N/A ☐
	c.	Cleaned up and properly managed the used oil and other materials?	Yes ☒ No ☐ N/A ☐
	d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes ☒ No ☐ N/A ☐
ON-SITE BURNING IN SPACE HEATER			
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:		
	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 ☐

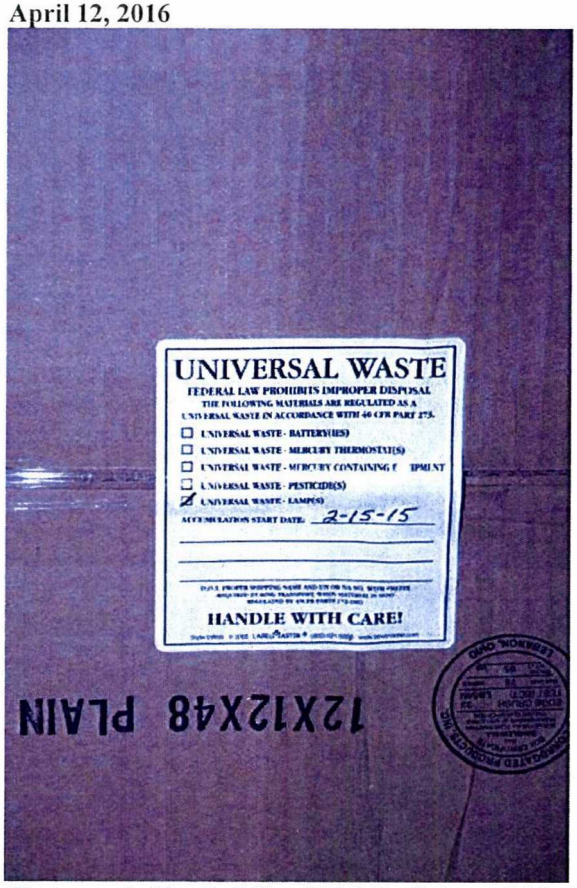
	b.	Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour?	Yes ☐ No ☐ N/A ☒
	c.	Are the combustion gases from heater vented to the ambient air?	Yes ☐ No ☐ N/A ☒
NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).			
GENERATOR TRANSPORTATION			
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24] Clean Harbors, TX (TXD982290140)		Yes ☒ No ☐ N/A ☐
12.	If the generator self-transports used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]		
	a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes ☐ No ☐ N/A ☒
	b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes ☐ No ☐ N/A ☒
NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).			
COLLECTION CENTERS AND AGGREGATION POINTS			
13.	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 ☒
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]		Yes ☐ No ☐ N/A ☒
15.	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 ☒
NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.			

Photograph #1 – Building XT-847, Column D25, Universal Waste Lamps



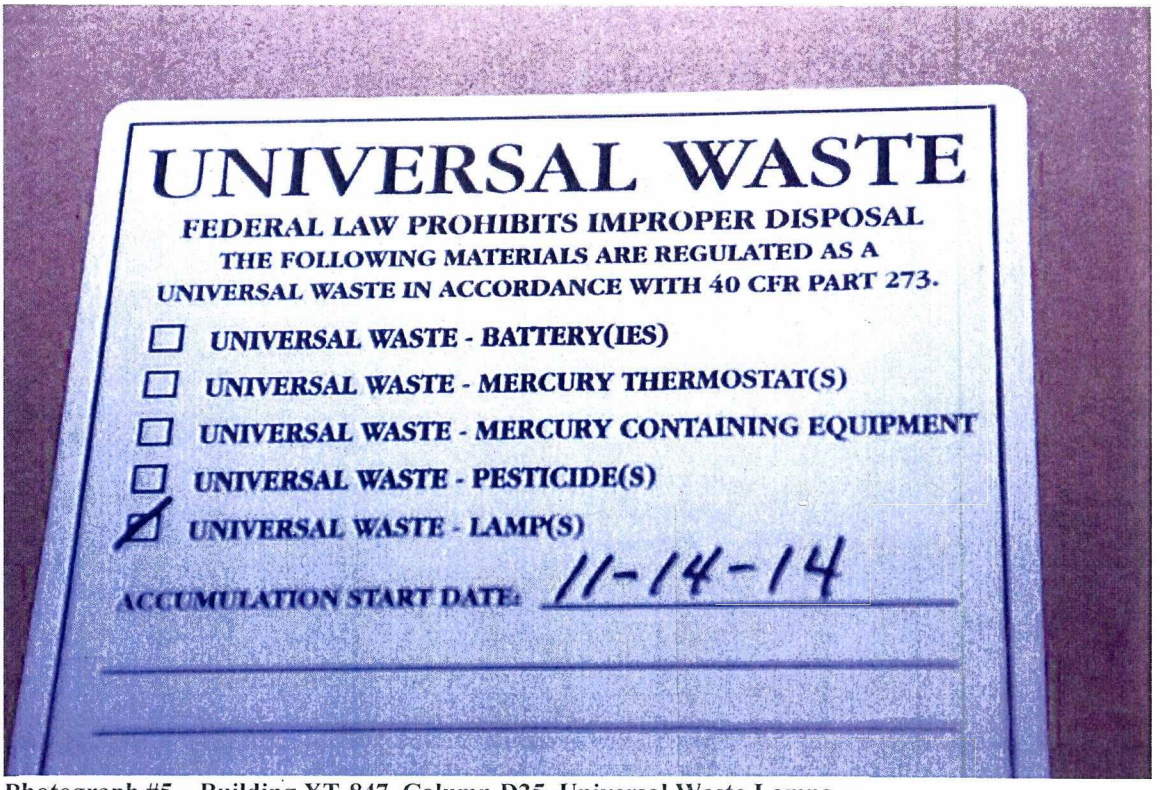
Photograph #2 – Building XT-847, Column D25, Universal Waste Lamps

U.S. DOE –Portsmouth Gaseous Diffusion Plant
Piketon, Ohio
April 12, 2016

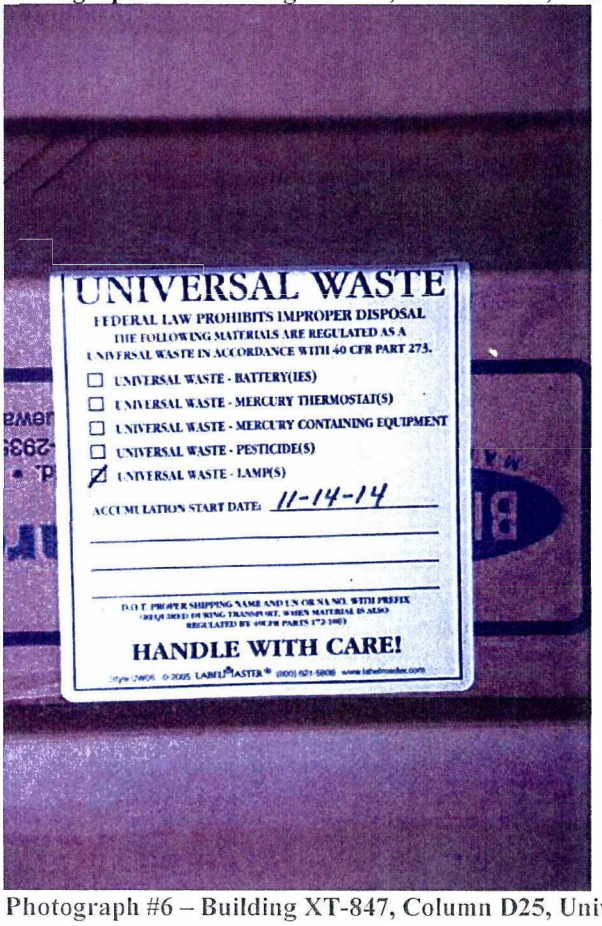


Photograph #3 – Building XT-847, Column D25, Universal Waste Lamps

Photograph #4 – Building XT-847, Column D25, Universal Waste Lamps

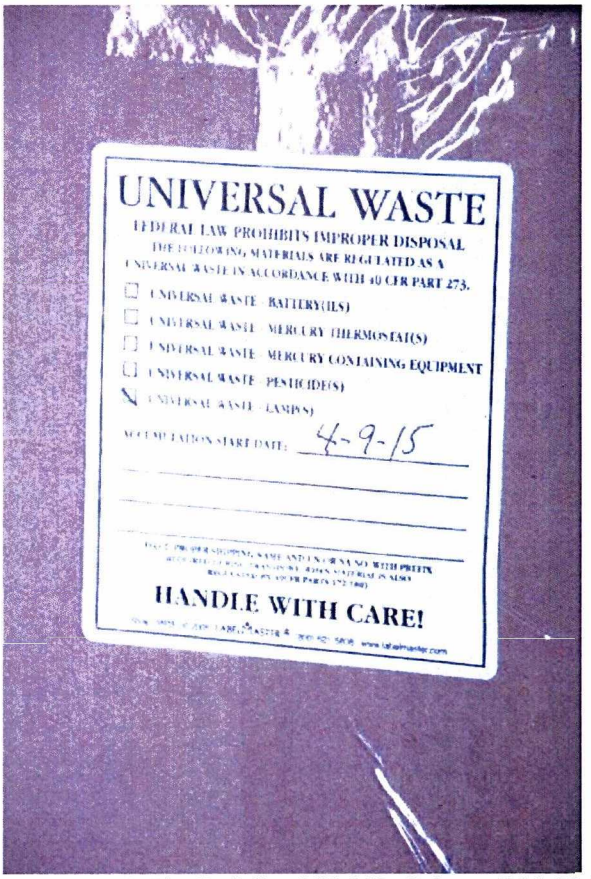


Photograph #5 – Building XT-847, Column D25, Universal Waste Lamps



Photograph #6 – Building XT-847, Column D25, Universal Waste Lamps

Photograph #7 - Building XT-847, Column D25, Universal Waste Lamps



Photograph #8 - Building XT-847, Column D25, Universal Waste Lamps

Photograph #9 - Building XT-847, Column D25, Universal Waste Lamps

OHT 890

LATA Parallax

LPP/TS-09-065
April 30, 2009

DISTRIBUTION

Ladies and Gentlemen:

DOE Contract No. DE-AC2405OH20192: Request for Temporary Authorization to Treat Hazardous Waste at the Portsmouth Gaseous Diffusion Plant Notification

The purpose of this letter is to provide notice in accordance with Ohio Administrative Code 3745-50-51(F) that the United States Department of Energy (DOE) and LATA/Parallax Portsmouth, LLC (LPP) have requested a Temporary Authorization for waste treatment activities to be completed at the Portsmouth Gaseous Diffusion Plant. Once approved, the temporary authorization will allow treatment of 107 containers of hazardous waste onsite. The treated waste will be disposed at an off-site facility licensed and permitted for the disposal of low level radiological waste.

If you have any questions regarding this notification, please contact Rosemary Richmond at (740) 897-2967.

Sincerely,

W. A. Franz
Project Manager

WAF:RR:bp

cc: Dave Kozlowski, PPPO/LEX
Dan McKenzie, LPP
William Murphie, PPPO/LEX
Melda Rafferty, PPPO/LEX
File–TS
File–LPP RMDC–RC

LATA/PARALLAX PORTSMOUTH, LLC

LPP/ESH&Q-08-131
October 28, 2008

DISTRIBUTION

Ladies and Gentlemen:

Contract DE-AC24-05OH20192: Class 1 Resource Conservation and Recovery Act (RCRA) Notification – OAC 3745-50-51

The purpose of this letter is to provide notice in accordance with OAC 3745-50-51 of Class 1 modifications to the RCRA Part B Permit (04-66-0680) issued to the United States Department of Energy and LATA/Parallax Portsmouth, LLC by the Ohio Environmental Protection Agency. The Class 1 modifications address the following permit changes to the RCRA Part B Contingency Plan:

- Change in Emergency Coordinator for the site
- Updated letters of agreement with support agencies

If you have any questions regarding this notification, please contact Rosemary Richmond at (740) 897-2967.

Sincerely,

W. A. Franz
Project Manager

WAF:RR:pb

cc: Dave Kozlowski, PPPO/LEX
Dave Sharp, LPP
William Murphie, PPPO/LEX
Melda Rafferty, PPPO/LEX
File – ESH&Q
File – LPP RMDC-RC

OhioEPA
State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, OH 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

Bob Taft, Governor
Bruce Johnson, Lieutenant Governor
Joseph P. Koncelik, Director

November 15, 2006

PIKE COUNTY
PORTSMOUTH GASEOUS DIFFUSION PLANT
RCRA-LQG/TSDF
OH7890008983/ 04-57-0680

Mr. William E. Murphie
Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

Mr. Paul Kreitz
LATA/Parallax Portsmouth, LLC
P.O. Box 855, Bldg. X-1000
Piketon, Ohio 45661

Dear Messrs.:

On November 6, 2006, I inspected the Portsmouth Gaseous Diffusion Plant (PGDP) in Portsmouth, Ohio to determine PGDP's compliance with Ohio's hazardous waste laws, the facility's hazardous waste installation and operation permit which became effective on March 15, 2001, the October 4, 1995 Directors Final Findings and Orders (Site Treatment Plan) and the June 23, 2005 Directors Final Findings and Orders (DUF6). My inspection included an inspection of company operations and a review of written documentation.

No violations of Ohio's hazardous waste rules were noted during the inspection.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. You can find more information about pollution prevention, including fact sheets at the following web address: http://www.epa.state.oh.us/opp. If you would like to be considered for an in-depth on-site pollution prevention assessment or if you would like more information about pollution prevention assessments, please contact me at 740-380-5256. You can also find copies of the rules and other information on Ohio EPA's web page at http://www.epa.state.oh.us.

Enclosed you will find a copy of the checklists completed during the inspection. Should you have any questions, please feel free to contact me 740-380-5256.

Sincerely,

Melody Stewart
District Representative
Division of Hazardous Waste Management

MS/mlm

Enclosure

cc: Walt Francis, USEPA - Region V

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

OhioEPA
State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, OH 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

Bob Taft, Governor
Bruce Johnson, Lieutenant Governor
Joseph P. Koncelik, Director

November 9, 2005

RE: PIKE COUNTY
PORTSMOUTH GASEOUS DIFFUSION PLANT
RCRA-LQG/TSDF
OH7890008983/ 04-57-0680

Mr. William E. Murphie
Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

Mr. Gail Mattson
LATA/Parallax Portsmouth, LLC
P.O. Box 855
Piketon, Ohio 45661

Dear Sir/Madam:

On October 26 and 27, 2005, Jim Michnowicz and I inspected the Portsmouth Gaseous Diffusion Plant (PGDP) in Portsmouth, Ohio to determine PGDP's compliance with Ohio's hazardous waste laws, the facility's hazardous waste installation and operation permit, which became effective on March 15, 2001, the October 4, 1995 Directors Final Findings and Orders (Site Treatment Plan) and the June 23, 2005 Directors Final Findings and Orders (DUF6). Our inspection included an inspection of company operations and a review of written documentation.

During the inspection, we found the following violations of the hazardous waste installation and operation permit and of Ohio's hazardous waste laws. In order to correct these violations, you must do the following and send me the required information ***within 30 days*** of your receipt of this letter:

(1) **Labeling/marking - standards for large quantity handlers of universal waste, OAC rule 3745-273-34(A)(E)**:

(A) Universal waste batteries, or a container or tank in which the batteries are contained, must be labeled or marked clearly with any one of the following: "Universal Waste-Battery(ies)," or "Waste battery(ies)," or "Used battery(ies)".

During the inspection, on October 26, 2005, a 55-gallon container of used batteries was labeled only as batteries, in violation of this rule. Photographic documentation received on October 27, 2005 by the generator and USDOE has adequately demonstrated compliance with this rule. No further action is required.

(E) Each lamp, or a container or tank in which such lamps are contained, must be labeled or marked clearly with any one of the following: "Universal Waste-Lamp(s)," or "Waste lamp(s)," or "Used lamp(s)".

During the inspection, on October 26, 2005, a 55-gallon container of used lamps was labeled only as flourescent bulbs in violation of this rule. Photographic documentation received on October 27, 2005 by the generator and USDOE has adequately demonstrated compliance with this rule. No further action is required.

(2) **Evaluation of wastes, OAC rule 3745-52-11(C)**: For purposes of compliance with Chapter 3745-270 of the Administrative Code, or if the waste is not listed as a hazardous waste in rules 3745-51-30 to 3745-51-35 of the Administrative Code, the generator must then determine whether the waste is identified in rules 3745-51-20 to 3745-51-24 of the Administrative Code by either: (1) Testing the waste according to the methods set forth in rules 3745-51-20 to3745-51-24 of the Administrative Code, or according to an equivalent method approved by the Region V Administrator of U.S. EPA pursuant to 40 CFR 260.21; or (2) Applying knowledge of the hazardous characteristic of the waste in light of the materials or the processes used.

The PDGP is currently storing 147 containers of Uranium Trioxide as a "Reusable Uranium Product". This material has been stored on-site since 2000. On September 23, 2003, Ohio EPA received analytical data from four of the 147 containers stored on-site. Ohio EPA is concerned with the data which shows a total value of chromium ranging from 34.2 to 171ppm. Based on these total values, Ohio EPA believes that the UO3 may be characteristic for chromium. Based on the above rule, the PGDP must test the UO3 using the toxicity characteristic leaching procedure, test Method 1311 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods,"U.S.EPA Publication SW-846. Ohio EPA is aware that UO3 from the Savannah River facility was tested using the toxicity characteristic leaching procedure in 1993. The TCLP results from the Savannah River UO3 were below the regulatory levels; however, the UO3 currently stored at the PGDP came from the Hanford facility. If the PDGP wishes to use process knowledge to claim that the UO3 is not a characteristic waste, the PDGP must submit information as to how the UO3 was produced at Hanford and any analytical data available.

(3) **General Permit Condition, B.20. Emergency Procedures OAC Rule 3745-54-56(A)(2):** Whenever there is an emergency situation consisting of imminent or actual harm or hazard to human health or the environment, the emergency coordinator (or his designee when the emergency coordinator is on call) must immediately notify the Ohio EPA.

Section G-3 and Figure G-3 of the contingency plan states that the Ohio EPA will be notified if the release is outside the facility. As required by the above rule, the PGDP must notify Ohio EPA whenever there is an emergency situation consisting of imminent or actual harm or hazard to human health or the environment regardless if the release is inside or outside the facility. The PGDP must revise the contingency plan to reflect the requirement in the above rule and submit the revised plan to Ohio EPA for review.

(4) **General Permit Condition, A.5. Duty to Comply OAC Rule 3745-50-58(A):** The Permittee shall comply with all applicable provisions of Ohio Revised Code (ORC) Chapter 3734, all applicable Ohio hazardous waste rules, and all terms and conditions of this permit, except to the extent and for the duration such noncompliance is authorized by the laws of

the State of Ohio. Any permit noncompliance, other than noncompliance authorized by the laws of the State of Ohio, constitutes a violation of ORC Chapter 3734 and the rules adopted thereunder and is grounds for enforcement action, suspension, revocation, modification, revision, denial of a permit renewal application or other appropriate action.

This violation will be abated when documentation has been received demonstrating compliance with all violations of the permit and OAC .

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. You can find more information about pollution prevention, including fact sheets, at the following web address: http://www.epa.state.oh.us/opp. If you would like to be considered for an in-depth on-site pollution prevention assessment or if you would like more information about pollution prevention assessments, please contact me at 740-380-5256. You can also find copies of the rules and other information on Ohio EPA's web page at http://www.epa.state.oh.us.

Enclosed you will find a copy of the checklists completed during the inspection. Should you have any questions, please feel free to contact me 740-380-5256.

Sincerely,

Melody Stewart
District Representative
Division of Hazardous Waste Management

MS/mlm

Enclosure

cc: Walt Francis, USEPA - Region V

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

STATE PART B HAZARDOUS WASTE PERMIT INSPECTION CHECKLIST

DIVISION OF HAZARDOUS WASTE MANAGEMENT
OHIO EPA
July 2002

Table of Contents
Portsmouth Gaseous Diffusion Plant
04-66-0680

RCRA Inspection Checklist 1

General Conditions of Permit 2
- General Permit Compliance and Activities 2

Permit Modification, Revision, Revocation 5

Site Entry - Availability of Records 7

Recordkeeping Requirements 7
- Confidentiality 7
- Operating Record 7
- Annual Report Requirement 9
- Sampling/monitoring Recordkeeping Requirements 9
- Waste Minimization Requirements 10

Off-site Shipments/manifest Requirements 11
- Manifest Requirements/wastes Received On-site 11

Waste Analysis/waste Analysis Plan 11
- General Requirements 12
- Waste Analysis Quality Assurance Requirements 12

General Inspection Requirements 14

Security Provisions/facility Operation 15

Personnel Training 16

Required Equipment 16

Contingency Plan Requirements 17
- Emergency Procedures 17
- Emergency Authorities 18
- Emergency Coordinator 18
- Amendment of Plan 18
- Implementation of Plan 19

Contingency Plan Requirements 20
- Closure Plan/amendment 20
- Closure Activities 20

Requirements for Ignitable, Reactive or Incompatible Wastes 22

Storage of Hazardous Wastes in Containers 24
- Condition of Containers 25
- Inspections 25
- Containment System 26
- Required Aisle Space 27
- Closure and Post-closure 27
- Container Storage of Residual Waste 27

Land Disposal Restriction Requirements 28
- Prohibition Against Dilution 28
- Generator Requirements 28

Notification/certification 29
Storage of Land Disposal Restricted Wastes 31

OHIO PART B PERMITTED FACILITY
RCRA INSPECTION CHECKLIST

Facility: Portsmouth Gaseous Diffusion Plant Ohio Permit #: 04-66-0680

Co-operator: LATA/Parallax Portsmouth, LLC

Address: 3930 U.S. Route 23 South
Piketon, OH 45661

USEPA ID#: OH7890008983
Facility Phone: 740-897-5010

County: Pike Time: 9:30 - 3:00 & 9:00 - 4:00

Inspection Date: 10/26/05 & 10/27/05

Advance notice of inspection given? ___(Yes) X (No)
If so, how far in advance? _____

	Name	***Agency/Title***	***Phone***
Inspector(s):	Jim Michnowicz	Ohio EPA	740-385-8501
	Melody Stewart	Ohio EPA	740-380-5256
Facility	Melda Rafferty	USDOE	740-897-5010
Representative(s):	Rosemary Richmond	LPP	740-897-5010

Is facility operating as a generator? Yes X No _____

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

PERMIT STATUS

Permit Issued: March 15, 2001
Permit Effective Date: March 15, 2001
Permit Expiration Date: March 15, 2011

STORAGE		**TREATMENT**		**DISPOSAL**	
X	Container		Tank		Injection Well
	Tank		Surface Impoundment		Landfill
	Waste Pile		Incinerator		Land Application
	Surface Impoundment		Thermal Treatment		Surface Impoundment

PROCESS DESCRIPTION

Historically, the main function of the DOE-PORTS facility was to enrich uranium for military use (nuclear submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in UF6 feedstock which contains 0.711% U235. However, in 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). USDOE retained ownership of the ongoing site environmental restoration program as well as two permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and are leased by USEC. These include decontamination of equipment and uranium recovery (X-705 Bldg.); chemical cleaning of equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); photo and printing lab (X-100); vehicle repair (X-750); coal pile runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in DOE owned and permitted storage facilities. Waste generated by DOE from the environmental restoration is also stored in these facilities. USEC ceased the enrichment process in May 2001.

WASTE MANAGEMENT, GENERATION AND AMOUNT

Uranium contaminated hazardous wastes (mixed waste) which were/are generated by USEC and DOE are stored on-site in DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of TSDs in the U.S. which could accept mixed waste, and a May 1991 DOE moratorium on off-site waste shipment. A large percentage of the waste generated at PORTS is DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in DOE-owned storage areas. During the past year, numerous shipments of hazardous waste were manifested off-site by both DOE and USEC. This is due to an increase in treatment capacity at off-site commercial treatment facilities and DOE treatment facilities, the lifting of the moratorium, and the execution of the site treatment plans for DOE and USEC. DOE sends some waste off-site (to USDOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to DOE for storage in the interim prior to their final disposal.

Hazardous

The DOE Part B permit lists numerous hazardous waste codes for wastes that are generated by the above processes and the environmental restoration. These are stored in drums ranging in size from 30- to 110-gallon capacity, 5-gallon containers, 20-gallon lab packs, 5' cans, 4'x4'x6' boxes, 4'x4'x8' boxes, polybottles and laboratory bottles.

Nonhazardous

A wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes.

HAZARDOUS WASTE MANAGEMENT UNITS

The following DOE-owned permitted storage facilities were inspected during the CEI:

-X-7725	Container Storage Facility
-X-326	Container Storage Facility

In addition, DOE-owned and operated HWMUs and SAAs were inspected in the following buildings:

-X-326	-X-622
-X-7725	-X-624
-X-623	-X-625
-X-3012	-X-749
-X-333	-X-330
-X-622T	-X-747H

REGULATORY/ENFORCEMENT HISTORY

As a result of violations of state and federal hazardous waste regulations found during the 1987, 1988, and 1989 OEPA RCRA inspections, USDOE and OEPA entered into a Consent Decree governing restoration of the environment at DOE-PORTS. This decree includes a requirement that DOE close the X-701B, X-749, X-231B, and X-616 units within specific timeframes. The X-749, X-616 and X-231B units have now been closed. X-701B is yet to be closed.

On October 4, 1995, DFFOs were signed which allowed DOE to store LDR wastes in excess of one year, so long as waste is being stored in compliance with the orders and an approved site treatment plan. These orders supercede the May 18, 1993, DFFOs.

On February 24, 1998, DOE, LMES and Ohio signed DFFOs and a Consent Order regarding past violations and the management of DUF6 and LiOH. This order was amended on March 12, 2004 and June 23, 2005. The latest amendment added LLP and UDS to the order.

On March 18, 1999, DOE and Ohio EPA signed DFFOs. These DFFOs provide exemptions to DOE and integrate the following unclosed units into the CMS/CMI process: X-749, X-231B, X-701C, X701B, X-230J7, and X-744Y.

A Part B permit was issued to DOE and its current co-operator, Bechtel Jacobs, for the X-7725 and X-326 storage facilities on March 15, 2001. A class 3 permit modification is in the approval process to change the co-operator from Bechtel Jacobs to LATA/Parallax Portsmouth, LLC.

GENERAL CONDITIONS OF PERMIT

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1. Has the expiration date of the permit passed? If so: Yes__No_X_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 _X_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? (Or upon a later date if the permittee can demonstrate good cause for late submittal.) [Condition A.6.(a)] Yes___No___ N/A _X_RMK#___

NOTE: *The permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:*

   A. The permittee has submitted a timely and complete application for a renewal permit under OAC rule 3745-50-40; and

   B. Through no fault of the permittee, a new permit has not been issued pursuant to OAC rule 3745-50-40 on or before the expiration date of the permit. [Condition A.6.(b)]

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.26] Yes_X_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? [Condition A.1.(b) and A.5] Yes_X__No_ N/A ___RMK#_1___

4. Have any provisions of the permit been identified as invalid? [Condition A.4.] Yes___No_X_ N/A ___RMK#___

5. Has the facility identified any instances of noncompliance with the permit, RC Chapter 3734. or the rules adopted thereunder, which may endanger human health or the environment? If so: Yes___No_X_ N/A ___RMK#___

   a. Did the facility immediately report orally the following to Ohio EPA's Emergency Response Section within 24 hours of becoming aware of the circumstance(s): [Condition A.20.(a)]

i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and — Yes__No__ N/A _X_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 or operator? — Yes__No__ N/A _X_RMK#__

B. Name, address and telephone number of the facility? — Yes__No__ N/A _X_RMK#__

C. Name and quantity of material(s) involved? — Yes__No__ N/A _X_RMK#__

D. The extent of injuries, if any? — Yes__No__ N/A _X_RMK#__

E. An assessment of the actual or potential hazard to the environment and human health outside the facility where this is applicable? — Yes__No__ N/A _X_RMK#__

F. Estimated quantity and disposition of recovered material that resulted from the incident? — Yes__No__ N/A _X_RMK#__

6. Did the permittee provide a written report to Ohio EPA's Emergency Response Section and DHWM, SEDO within five days of the time the permittee became aware of the circumstances reported in Question 5? [Condition A.21.] If so did the report contain: — Yes__No__ N/A _X_RMK#__

a. A description of the noncompliance and its cause (including exact dates and times)? — Yes__No__ N/A _X_RMK#__

b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? — Yes__No__ N/A _X_RMK#__

c. Steps taken or planned to minimize the impact on human health and the environment and to reduce and prevent recurrence of the noncompliance? — Yes__No__ N/A _X_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 becomes aware of the circumstances. [Condition A.21.(c)]*

7.	Has the permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8]	Yes__No__ N/A _X_RMK#__
8.	Has the permittee identified any other instances of noncompliance not provided for in Question 5?	Yes__No__ N/A _X_RMK#__
	a. If so, did the permittee report to the director within a month of the time at which the permittee is aware of such noncompliance? [Condition A.22.]	Yes__No__ N/A _X_RMK#__
	b. Do the reports provided contain the information set forth in Condition A.20?	Yes__No__ N/A _X_RMK#__
9.	Has the permittee planned any physical alterations or additions to the permitted facility?	Yes__No_X_ N/A ___RMK#__
	a. If so, has the facility provided Ohio EPA with notice of such changes? [Condition A.15]	Yes__No__ N/A _X_RMK#__

Note: *Such notification does not waive the permittee's duty to comply with the permit pursuant to Condition A.5.*

REMARKS

#1. Universal waste batteries and waste lamps were not labeled as required. In addition, UO3 has not been adequately evaluated.

PERMIT MODIFICATION, REVISION, REVOCATION

1.	Has the permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.]	Yes X No__ N/A ___RMK#__
2.	Has the permit been transferred to a new owner or operator? [Condition A.18.] If so,	Yes X No_ N/A ___RMK# 2__
	a. Has the transfer been conducted in accordance with R.C. Chapter 3734. and the rules adopted thereunder? [Condition A.18.]; and	Yes__No__ N/A _X_RMK#__
	b. Before transferring ownership did the permittee notify the new owner in writing of the requirements of R.C. Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.18.]	Yes__No__ N/A _X_RMK#__
3.	Has the permittee submitted reports of compliance or noncompliance with, or any progress reports on the requirements contained 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 _X_RMK#__
4.	Has the permittee furnished relevant information which Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, or to determine compliance with the permit? [Condition A.10]	Yes X No__ N/A ___RMK#__
5.	Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10]	Yes X No__ N/A ___RMK#__
6.	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 HWFB? If so,	Yes__No X N/A ___RMK#__
	a. Has the permittee promptly submitted such facts or corrected information to the appropriate entity? [Condition A.24.]	Yes__No__ N/A _X_RMK#__

7. Is the permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications to the application? [Condition A.14.(c)] Yes X No___ N/A ___RMK#___

8. Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14.(c)] Yes X No___ N/A ___RMK#___

REMARKS

#2 A class 3 permit modification is in progress to change the co-operator to LPP.

SITE ENTRY - AVAILABILITY OF RECORDS

1. As specified in Condition A.11., has the permittee allowed the director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection, 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 X No ___ N/A ___ RMK#___

   b. Have access to and copy any records required to be kept under the conditions of the permit? — Yes X No ___ N/A ___ RMK#___

   c. Inspect at reasonable times facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit? — Yes X No ___ N/A ___ RMK#___

   d. Sample, document, or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by R.C. Chapter 3734. and the rules adopted thereunder? — Yes X No ___ N/A ___ RMK#___

RECORDKEEPING REQUIREMENTS

CONFIDENTIALITY

1. Has the permittee requested confidentiality of any information of the permit in accordance with R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.25.] — Yes ___ No X N/A ___ RMK#___

OPERATING RECORD

2. Is the permittee maintaining a written operating record at the facility as set forth in OAC rule 3745-54-73 and Condition B.22. of the permit which contains the following elements:

   a. A description and the quantity of each hazardous waste received? — Yes X No ___ N/A ___ RMK#___

b. Method(s) and date(s) of treatment, storage or disposal at the facility? Yes X No___ N/A ___RMK#___

c. The location of each hazardous waste within the facility and the quantity at each location? Yes X No___ N/A ___RMK#___

3. Is the permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents as part of its operating record: [Condition A.28.]

a. Waste analysis plan in accordance with OAC rule 3745-54-13 and the conditions of the permit? Yes X No___ N/A ___RMK#___

b. Contingency plan in accordance with OAC rule 3745-54-53 and the conditions of the permit? Yes X No___ N/A ___RMK#___

c. Closure plan in accordance with OAC rule 3745-55-12 and the conditions of the permit? Yes X No___ N/A ___RMK#___

d. Personnel training plan and records required by OAC rule 3745-54-16 and the conditions of the permit? Yes X No___ N/A ___RMK#___

e. Inspection schedules developed in accordance with OAC rules 3745-54-15 and 3745-55-74 and the conditions of the permit? Yes X No___ N/A ___RMK#___

4. Have any of the documents identified in Question #3 been revised as required by the permit? If so, Yes X No___ N/A ___RMK#___

a. Has the permittee submitted the revisions to Ohio EPA? [Condition A.28.(b)] Yes X No___ N/A ___RMK#___

b. Has the permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.28.(b)] Yes X No___ N/A ___RMK#___

5. Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from the date of inspection? [Condition A.28.(c)] Yes X No___ N/A ___RMK#___

ANNUAL REPORT REQUIREMENT

6. 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 and the conditions of the permit? [Condition B.25.] — Yes X No ___ N/A ___ RMK#___

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

7. In compliance with Condition A.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 X No ___ N/A ___ RMK#___

   b. Individual(s) who performed the sampling or measurement? — Yes X No ___ N/A ___ RMK#___

   c. Date(s) analyses were performed? — Yes X No ___ N/A ___ RMK#___

   d. Individual(s) who performed the analyses? — Yes X No ___ N/A ___ RMK#___

   e. Analytical technique(s) or method(s) used? — Yes X No ___ N/A ___ RMK#___

   f. Results of such analyses? — Yes X No ___ N/A ___ RMK#___

8. 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 A.12.(a)] — Yes X No ___ N/A ___ RMK#___

9. Has Ohio EPA requested submittal of any reports or other information required by the conditions of the permit from the permittee? If so, — Yes ___ No X N/A ___ RMK#___

   a. Have the submittals been signed and certified according to OAC rules 3745-50-58(K) and 3745-50-42? [Condition A.13.] — Yes ___ No ___ N/A X RMK#___

WASTE MINIMIZATION REQUIREMENTS

10. Has the permittee submitted a Waste Minimization Report to Ohio EPA meeting the requirements of Condition A.29. of the permit within 180 days of permit journalization? Yes X No___ N/A ___RMK#___

    a. Following the first submittal as identified above in Question #10, has the permittee submitted biennial updates to this report as required by Condition A.29.(c)? Yes X No___ N/A ___RMK#___

REMARKS

OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS

1. Is all hazardous and mixed waste transported from the facility by a properly registered transporter of hazardous and mixed waste in accordance with all applicable laws, rules and standards? [Condition A.16.] — Yes X No__ N/A __RMK#__

MANIFEST REQUIREMENTS/WASTES RECEIVED ON-SITE

2. Upon receipt of the manifests, has the permittee signed and dated each copy of the manifest? [OAC 3745-54-71(A)(1); Condition B.24.] — Yes X No__ N/A __RMK#__

3. For any significant discrepancies identified upon receipt of the manifest(s): did the permittee note such discrepancies on the manifest(s) in accordance with OAC rule 3745-54-71(A)(2) and Condition B.24? — Yes__No__ N/A X RMK#__

   a. Did the permittee attempt to reconcile the discrepancy? [Condition B.24.] — Yes__No__ N/A X RMK#__

   b. If the discrepancy was not resolved within 15 days: did the permittee submit a report, including a copy of the manifest, to the director in accordance with OAC rule 3745-54-72(B)? [Condition B.24.] — Yes__No__ N/A X RMK#__

4. Does the permittee immediately give the transporter at least one copy of the signed manifest? [OAC 3745-54-71(A)(3); Condition B.24.] — Yes X No__ N/A __RMK#__

5. Does the permittee provide the generator with a copy of the manifest within 30 days of receipt of waste on-site? [OAC 3745-54-71(A)(4); Condition B.24.] — Yes X No__ N/A __RMK#__

6. Does the permittee retain a copy of each manifest on-site for at least three years from the date of delivery? [OAC 3745-54-71(A)(5); Condition B.24.] — Yes X No__ N/A __RMK#__

7. Has the permittee received any hazardous waste or mixed waste from off-site, other than as described in Condition B.2(b)? — Yes__No X N/A __RMK#__

WASTE ANALYSIS/WASTE ANALYSIS PLAN

GENERAL REQUIREMENTS

1. Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information which is necessary to properly treat, store or dispose of the waste in accordance with OAC Chapters 3745-54 to 3745-57 and Condition B.3 of the permit (Section C of the approved permit application)? [OAC 3745-54-13(A)(1)] — Yes X No ___ N/A ___ RMK#___

2. Since the last inspection, were any wastes generated by the facility which were unable to be characterized through process knowledge? If so, — Yes ___ No X N/A ___ RMK#___

   a. Were the waste analysis procedures described in Section C of the approved permit application followed? — Yes ___ No ___ N/A X RMK#___

3. Is the permittee following the procedures described in the approved waste analysis plan (Section C of approved permit application) and the requirements of OAC rule 3745-54-13? [Condition B.3.] — Yes X No ___ N/A ___ RMK#___

4. Is the permittee maintaining waste analysis data in the facility's operating record as required by OAC rule 3745-54-73 and Condition B.22. of the permit? — Yes X No ___ N/A ___ RMK#___

WASTE ANALYSIS QUALITY ASSURANCE REQUIREMENTS

5. Is the permittee verifying the analysis of each waste stream annually as part of its quality assurance program in accordance with SW-846? [Condition B.3.] — Yes X No ___ N/A ___ RMK#_

6. In accordance with Condition B.3. of the permit, does the permittee's quality assurance plan ensure that the permittee is, at a minimum:

   a. Maintaining property functional instruments? — Yes X No ___ N/A ___ RMK#___

   b. Using approved sampling/analytical methods? — Yes X No ___ N/A ___ RMK#___

   c. Verifying the validity of sampling and analytical procedures and performance of correct calculations? — Yes X No ___ N/A ___ RMK#___

7.	If the permittee uses a contract laboratory to perform analyses, did the permittee inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this permit?	Yes X No___ N/A ___RMK#___

REMARKS

GENERAL INSPECTION REQUIREMENTS

1. Is the permittee following the inspection procedures and schedules described in Section F of the approved permit application and the requirements of OAC rule 3745-54-15? [Condition B.5.] — Yes X No___ N/A ___RMK#___

2. Does the permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [OAC 3745-54-15(A)(1)(2)] — Yes X No___ N/A ___RMK#___

3. 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? — Yes X No___ N/A ___RMK#___

   a. Is the schedule kept at the facility? [OAC 3745-54-15(B)(2)] — Yes X No___ N/A ___RMK#___

   b. Does the schedule identify the types of problems which are to be looked for during the inspection? [OAC 3745-54-15(B)(3)] — Yes X No___ N/A ___RMK#___

   c. Does the schedule include inspection of areas subject to spills daily when in use and according to other applicable regulations when not in use? [OAC 3745-54-15(B)(4)] — Yes X No___ N/A ___RMK#___

4. 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 X No___ N/A ___RMK#___

5. Is the permittee maintaining records of inspections for a minimum of three years? [Condition B.5.] — Yes X No___ N/A ___RMK#___

6. 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 X No___ N/A ___RMK#___

   b. Signature of inspector? — Yes X No___ N/A ___RMK#___

c. Notation of observations made? Yes X No___ N/A ___RMK#___

d. Date/nature of any repairs or other remedial actions? Yes X No___ N/A ___RMK#___

SECURITY PROVISIONS/FACILITY OPERATION

1. Is the permittee complying with the security provisions of OAC rule 3745-54-14(B)(1) and B(2) and (C) and Section F of the approved permit application, including the following: [Condition B.4.]

   a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility; Yes X No___ N/A ___RMK#___

   b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility; or Yes X 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 X No___ N/A ___RMK#___

2. In accordance with OAC rule 3445-54-14(C), does the permittee have signs reading "Danger-Unauthorized Personnel Keep Out" posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? [Condition B.4.] Yes X No___ N/A ___RMK#___

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 waters? [Condition B.1.] Yes X No___ N/A ___RMK#___

PERSONNEL TRAINING

1. Is the facility conducting personnel training in accordance with Section H of the approved permit application and the following requirements of OAC rule 3745-54-16: [Condition B.6.]

   a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC 3745-54-16(A)(B)(C)] — Yes X 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 3745-54-16(B)? — Yes X No___ N/A ___RMK#___

   c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(B)? — Yes X 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 X No___ N/A ___RMK#___

REQUIRED EQUIPMENT

1. Is the permittee, at a minimum, maintaining the equipment set forth in the approved permit application (Section G) at the facility? [Condition B.9.] — Yes X No___ N/A ___RMK#___

2. Is the permittee inspecting, testing, and maintaining the equipment specified in Question #1 to assure its proper operation as specified in OAC rule 3745-54-33, the inspection plans and Section G of the approved permit application? [Condition B.10.] — Yes X 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 Section G of the approved permit application? [Condition B.11.] — Yes X No___ N/A ___RMK#___

CONTINGENCY PLAN REQUIREMENTS

EMERGENCY PROCEDURES

1. In compliance with Condition B.13.(a) of the permit, does the permittee:

   a. Familiarize the emergency response agencies likely to respond to an emergency at the facility with:

      i. The location and layout of the facility? Yes X No___ N/A ___RMK#___

      ii. Properties of hazardous waste and mixed waste managed at the facility and associated hazards? Yes X No___ N/A ___RMK#___

      iii. Places where facility personnel will normally be working? Yes X No___ N/A ___RMK#___

      iv. Entrances to and roads inside the facility? Yes X No___ N/A ___RMK#___

      v. Evacuation routes as depicted in Section G of the permit application? Yes X No___ N/A ___RMK#___

   b. Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the facility, and any further requirements imposed by the permit?; and Yes X No___ N/A ___RMK#___

   c. Familiarize local police and fire departments, local hospitals and other local emergency services with the properties of hazardous waste and mixed waste managed at the facility and the types of injuries which could result from fires, explosions or a release of hazardous wastes at the facility? Yes X No___ N/A ___RMK#___

2. Is the permittee in compliance with the requirements of OAC rule 3745-54-56 and Section G of the approved permit application regarding emergency procedures? [Condition B.20.] Yes_No X_ N/A ___RMK# 3_

EMERGENCY AUTHORITIES

3. 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_X_ 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 _X_RMK#___

4. 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.] — Yes_X_No___ N/A ___RMK#___

5. Has the permittee notified the agencies in Question #4, in writing, within ten days of the effective date of any amendments or revisions to the Plan? [Condition B.18.(b)] — Yes_X_No___ N/A ___RMK#___

6. 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 in accordance with OAC rule 3745-54-53? [Condition B.18.(c)] — Yes_X_No___ N/A ___RMK#___

EMERGENCY COORDINATOR

7. Is the permittee in compliance with the requirements of OAC rule 3745-54-55 with regard to the emergency coordinator? [Condition B.19.] — Yes_X_No___ N/A ___RMK#___

AMENDMENT OF PLAN

8. Is the permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17.] — Yes_X_No___ N/A ___RMK#___

Note: *Also see Question #4 of RECORDKEEPING REQUIREMENTS to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.*

IMPLEMENTATION OF PLAN

9. Has there been a fire, explosion or release of hazardous waste or mixed waste or constituents at the facility since the last date of inspection as described by Condition B.14. of the permit? If so, — Yes__No_X_ 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? [Condition B.14.] — Yes__No__ N/A _X_RMK#___

   b. Did the permittee collect and manage released material, emergency response material and by-products as hazardous waste or mixed waste until making a demonstration to Ohio EPA that such materials are not subject to Ohio hazardous waste rules? [Condition B.16.] — Yes__No__ N/A _X_RMK#___

   c. 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 _X_RMK#___

      i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23.] ***Note:*** *See also Conditions A.21. and A.22. of the permit for additional reporting/recordkeeping requirements.* — Yes__No__ N/A _X_RMK#___

   d. 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? [Condition B.23.] — Yes__No__ N/A _X_RMK#___

REMARKS

#3. The contingency plan states that OEPA will only be contacted when a release has a direct impact on th environment outside the reservation boundary...". The OEPA must be contacted whenever the contingency plan has been implemented.

CONTINGENCY PLAN REQUIREMENTS

CLOSURE PLAN/AMENDMENT

1. Is the permittee maintaining at the facility, the approved closure plan which contains the elements set forth in OAC rule 3745-55-12? [Condition B.29.] — Yes X No___ N/A ___RMK#___

2. Has the permittee amended the closure plan? If so, — Yes___No X N/A ___RMK#___

   a. Has the plan been amended in accordance with OAC rule 3745-55-12(C)? [Condition B.28.] — Yes___No___ N/A _X_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.*

CLOSURE ACTIVITIES

3. Has the permittee closed the facility? If so, — Yes___No X N/A ___RMK#___

   a. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26.] — Yes___No___ N/A _X_RMK#___

   b. Did the permittee carry-out the approved closure plan as set forth in the permit application and terms and conditions of the permit? [Condition B.26.] — Yes___No___ N/A _X_RMK#___

   c. After receiving the final volume of hazardous waste, did the permittee remove from the facility all hazardous waste and mixed 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 _X_RMK#___

   d. 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 _X_RMK#___

   e. Did the permittee notify Ohio EPA's Southeast District Office within five working days prior to all rinseate and soil sampling? [Condition B.32.(b)] — Yes___No___ N/A _X_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 _X_RMK#___

REMARKS

REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

1. Is the permittee following the procedures as specified in OAC rules 3745-54-17, 3745-55-77 and Section F of the approved application when managing ignitable, reactive and/or incompatible wastes? [Conditions B.7.(a) and C.10. and C.11.] — Yes X No___ N/A ___RMK#___

2. Does the permittee ***not*** store incompatible waste ***except*** in accordance with OAC rules 3745-54-17(B) and 3745-55-77, and the terms and conditions of this permit? [Condition C.11.(a)] — Yes X No___ N/A ___RMK#___

3. Does the permittee take precautions to prevent placing hazardous waste or mixed waste in an unwashed container that previously held an incompatible waste or material? [Condition C.11.(b)] — Yes X No___ N/A ___RMK#___

4. Does the permittee ensure that all containers of incompatible wastes are physically separated from other incompatible wastes or materials by a wall, berm, dike, or other device in accordance with OAC rule 3745-55-77 and the Appendix to OAC rule 3745-55-99? [Condition C.11.(c)] — Yes X No___ N/A ___RMK#___

   a. Are all containers of aqueous hazardous acids (ph $\leq$ 2) and caustics ph $\geq$ 12.5) sorted on different pallets and physically separated in different rooms? [Condition C.11.(c)] — Yes X No___ N/A ___RMK#___

   b. Are aqueous acids and caustics in poly bottles, and other containers requiring nuclear criticality safety spacing physically separated in the same room by a dike? [Condition C.11.(c)] — Yes X No___ N/A ___RMK#___

   c. Are containers of cyanides and sodium metals being stored in rooms physically separate from other incompatible wastes or other incompatible materials? [Condition C.11.(c)] — Yes X No___ N/A ___RMK#___

5. Does the permittee provide electrical grounding for all containers, tanks and transport vehicles during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(b)] — Yes X No___ N/A ___RMK#___

6.	Does the permittee provide and require the use of spark proof tools during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(c)]	Yes X No___ N/A ___RMK#___
7.	Does the permittee prohibit smoking and open flames in areas where hazardous wastes are managed and post appropriate signs? [Condition B.7.(d)]	Yes X No___ N/A ___RMK#___
8.	As required by OAC rule 3745-55-76, does the permittee store containers of ignitable or reactive wastes greater than 15 meters (50 feet) away from the Portsmouth Gaseous Diffusion Plant reservation boundary? [Condition C.10.(a)]	Yes X No___ N/A ___RMK#___

REMARKS

STORAGE OF HAZARDOUS WASTES IN CONTAINERS

NOTE: *The requirements of permit 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.*

1. Is the permittee storing in containers, only those wastes as specified in Section A of the Part B permit application? [Condition C.1.(a), C.2.] Yes X No___ N/A ___RMK#___

2. Does the permittee limit the total quantity of containerized waste in the container storage area to 133,000 gallons at any given time in the permitted container areas, located in building X-326 and no more than 5,456,000 gallons at any given time in the permitted storage areas located in building X-7725? [Condition C.1.(a)] Yes X No___ N/A ___RMK#___

NOTE: *For the purposes of compliance with the capacity limitation of the permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity. For example, a 55-gallon drum will be considered to be holding 55 gallons of waste, regardless of the actual quantity stored in the drum. [Condition C.1.(b)]*

3. When accumulating waste within the permitted X-7725 and X-326 container storage area, does the permittee ensure that the total amount of waste (both > 90 days and < 90 days) does not exceed the maximum container storage inventory established under Condition C.1.? [Condition C.1.(c)] Yes X No___ N/A ___RMK#___

4. Are hazardous wastes subject to regulation by the permit stored only at the designated container storage area described in the approved permit application? (See Section D of the permit application) [Condition C.1.(a)] Yes X No___ N/A ___RMK#___

5. Is each container stored clearly marked to identify its contents and the date each period of accumulation/storage begins? (See Section D of the permit application) [Condition C.3.] Yes X No___ N/A ___RMK#___

6. Does the permittee store hazardous waste in the types of containers described in Section D of the approved permit application? [Condition C.1.(a)] Yes X No___ N/A ___RMK#___

CONDITION OF CONTAINERS

8. Are containers holding hazardous wastes in good condition? [Condition C.3.] — Yes X No__ N/A ___RMK#___

   a. If not, (e.g., severe rusting, structural defects) did the permittee transfer the hazardous waste from such a container to a container that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit and OAC rule 3745-55-71? [Condition C.3.] — Yes__No_ N/A _X__RMK#___

9. 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 C.4.] — Yes X No__ N/A ___RMK#___

10. Is storage conducted in the container storage containment system as described in Condition C.1. of the permit and Section D of the approved permit application? [Condition C.5.(a)] — Yes X No__ N/A ___RMK#___

11. 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 C.5.(b)] — Yes X No__ N/A ___RMK#___

12. Are lab-pack wastes handled in compliance with applicable storage requirements? [Condition C.5.(c)] — Yes X No__ N/A ___RMK#___

13. Are lab-pack wastes packaged in drums containing absorbent material that is compatible with the wastes? [Condition C.5.(d)] — Yes X No__ N/A ___RMK#___

INSPECTIONS

14. Is the permittee inspecting the container area weekly in accordance with OAC rules 3745-54-15, and 3745-54-73 and the approved inspection schedule (Section F) to detect leaking containers and deterioration of containers and the containment system? [Condition C.8.] — Yes X No__ N/A ___RMK#___

   a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken? [Condition C.8.] — Yes X No__ N/A ___RMK#___

b. On days when containerized waste are added or removed to and/or from any of the permitted areas for storage, does the permittee conduct inspections as described in Section F of the approved Part B permit application and maintain the inspection results in the facility operating record? [Condition C.8.] Yes X No___ N/A ___RMK#___

CONTAINMENT SYSTEM

15. Does the permittee maintain the containment system as described in Section D of the approved Part B permit application, including: [Condition C.6.] Yes X No___ N/A ___RMK#___

a. Sufficient design to contain 10% of the total volume of the containers or the volume of the largest container, whichever is greater? [Condition C.6.(b)] Yes X No___ N/A ___RMK#___

b. A system which is free of gaps and sufficiently impervious to contain leaks and spills? Yes X No___ N/A ___RMK#___

c. Equipped with a coating which is compatible with each waste stored in the area? Yes X No___ N/A ___RMK#___

d. *For those wastes which are deemed incompatible with liner material:* Has the permittee installed a separate secondary containment structure within the existing structure which is equipped with a compatible liner? Yes___No___ N/A X RMK#___

16. Has the permittee had a spill or leak of wastes or an accumulation of precipitation in the containment system? If so, Yes___No X N/A ___RMK#___

a. Are spilled or leaked wastes and accumulated precipitation removed from the sump or collection area in a timely manner? [Condition C.6.(c)] Yes___No___ N/A X RMK#___

b. Does removal of spilled/leaked wastes and accumulated precipitation occur within 24 hours from the time the spill or leak waste is discovered? [Condition C.6.(c)] Yes___No___ N/A X RMK#___

REQUIRED AISLE SPACE

17.	Is the permittee maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in the event of an emergency to any area of the facility as required by OAC rule 3745-54-35? [Condition B.12.]	Yes X No___ N/A ___RMK#___

CLOSURE AND POST-CLOSURE

18.	At closure of the container storage area, did the permittee remove all hazardous waste, hazardous waste residues, mixed waste and mixed waste residues from the containment system, in accordance with the procedures set forth in the approved closure plan (Section I of the permit application)? [Condition C.13.(a)]	Yes___No___ N/A _X_RMK#___
19.	During closure, if the permittee could not demonstrate that all contaminated soils could be removed, did the permittee close the unit and perform post-closure care following a plan approved by Ohio EPA? [Condition C.13.(b)]	Yes___No___ N/A _X_RMK#___

CONTAINER STORAGE OF RESIDUAL WASTE

20.	Is the permittee complying with the provisions of Section C-2E of the application as amended pursuant to Condition B.2.(b) of this permit?	Yes X No___ N/A ___RMK#___

LAND DISPOSAL RESTRICTION REQUIREMENTS

PROHIBITION AGAINST DILUTION

1. Has the permittee updated the annual Federal Facility Compliance Act Schedule? [OAC rule 3745-270-50; Condition B.36.] — Yes X No ___ N/A ___ RMK#___

2. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [OAC rule 3745-270-40 through 49; Condition B.36.(c)] — Yes ___ No X N/A ___ RMK#___

   a. As a substitute for adequate treatment to achieve compliance with LDR treatment standards? — Yes ___ No ___ N/A X RMK#___

   b. To circumvent the effective date of a prohibition (e.g., to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)? — Yes ___ No ___ N/A X RMK#___

   c. To otherwise avoid a prohibition in OAC rule 3745-270-30 through -39? — Yes ___ No ___ N/A X RMK#___

   d. To otherwise avoid a prohibition imposed by Section 3004(d) of RCRA? — Yes ___ No ___ N/A X RMK#___

NOTE: *If the answer to any of Questions 2(a) through 2(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of OAC rule 3745-270-03 [Condition B.36.]. Dilution of wastes is permissible under some conditions. See OAC rule 3745-270-03(B).*

GENERATOR REQUIREMENTS

3. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No _ N/A ___ RMK#_

   a. ***For determinations based solely on knowledge of the waste***: Is supporting data used to make this determination being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No ___ N/A ___ RMK#___

   b. ***For determinations based upon analytical testing***: Is a copy of waste analysis data being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No ___ N/A ___ RMK#___

4. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g., wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [OAC rule 3745-270-07; Condition B.36.(e)] Yes X No___ N/A ___RMK#___

5. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [OAC rule 3745-270-07(A); Condition B.36.(e)] Yes X No___ N/A ___RMK#___

6. Does the entity generate any listed waste(s) which are restricted from land disposal? If so, Yes X No___ N/A ___RMK#___

   a. Do such wastes also exhibit hazardous waste characteristics as identified in OAC rules 3745-51-20 to 3745-51-24? Yes X No___ N/A ___RMK#___

   b. ***For listed wastes which also exhibit a characteristic*:** Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [OAC rule 3745-270-09(A)] Yes X No___ N/A ___RMK#___

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC rule 3745 270-09(B)].*

NOTIFICATION/CERTIFICATION

7. ***For wastes that do not meet treatment standards:*** Has the generator submitted a one-time written notice to the treatment/storage facility receiving the wastes, that wastes being received do not meet treatment standards? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No___ N/A ___RMK#___

   If so, does the notice including the following:

   a. EPA hazardous waste number? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No___ N/A ___RMK#___

   b. Appropriate treatment standard for the waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No___ N/A ___RMK#___

c. The manifest number associated with the first shipment of waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No ___ N/A ___ RMK#___

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No ___ N/A ___ RMK#___

e. Applicable wastewater/non-wastewater category [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No ___ N/A ___ RMK#___

f. For hazardous debris, list the contaminants subject to treatment, as described in paragraph (B) of OAC rule 3745-270-45; and an indication that these contaminants are being treated to comply with OAC rule 3745-270-45. — Yes X No ___ N/A ___ RMK#___

g. For contaminated soil list the constituents subject to treatment as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. — Yes X No ___ N/A ___ RMK#___

8. ***For wastes that meet treatment standards:*** Does the generator submit a one-time written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes X No ___ N/A __ RMK#___

If so, does the notice/certification including the following:

a. EPA hazardous waste identification number? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes X No ___ N/A __ RMK#___

b. The corresponding treatment standards and applicable prohibitions for the waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes X No ___ N/A __ RMK#___

c. The manifest number associated with the shipment of waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes X No ___ N/A __ RMK#___

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes X No___ N/A __RMK#___

e. Is the certification signed by the generator or an authorized representative? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes X No___ N/A _RMK#___

f. For contaminated soil list the constituents subject to treatment as described as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. Yes X No___ N/A __RMK#___

9. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years? [OAC rule 3745-270-07(A)(8); Condition B.36.(j)] Yes X No___ N/A ___RMK#___

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

NOTE: *The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate LDR wastes that do not meet treatment standards in tanks or containers. A LQG who stores LDR wastes on-site for greater than 90 days becomes a operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.*

NOTE: *The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [OAC rule 3745-270-50(E); 40 CFR 268.50(e)]*

10. Is the owner/operator storing LDR restricted wastes in containers? If so, is each container marked with the following information in accordance with OAC rule 3745-270-50(A)(2)(a) [Condition B.36(l)] Yes X No___ N/A ___RMK#___

a. The identification of the contents? Yes X No___ N/A ___RMK#___

b. The date which accumulation began? Yes X No___ N/A ___RMK#___

NOTE: *A TSD facility may store LDR wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [OAC rule 3745-270-50(B)]. During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.*

11. Are LDR wastes being stored at the facility for greater than one year? If so,

    a. Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [OAC rule 3745-270-50(B); Condition B.36(m)] — Yes X No___ N/A ___RMK#___

RCRA HAZARDOUS WASTE GENERATOR
INSPECTION CHECKLIST

Company: Portsmouth Gaseous Diffusion Plant EPA ID#: OH7 890 008 983

Street: 3930 U.S. Route 23 South City: Piketon

County: Pike State: Ohio Zip: 45661

Mailing Address: 1017 Majestic Drive, Suite 200 Lexington, Kentucky 40513
(If different from above)

Telephone: 740-897-5010 Fax #:

Owner/ Operator:
(If different from above)

Street:

City: State: Ohio Zip:

Inspection Date(s): October 26 & 27, 2005 Time(s): 9:30 - 3:00 & 9:00 - 4:00

Inspection Announced? _____ Yes __X__ NO If so, how much advance notice given?

	Name	Affiliation	Telephone
Inspectors:	Jim Michnowicz	Ohio EPA	740-385-8501
	Melody Stewart	Ohio EPA	740-380-5256
Facility Representative:	Rosemary Richmond	LPP	740-897-2967
	Melda Rafferty	USDOE	740-897-5521

Complete All Other Applicable Checklists

Generator Classification	Waste Management Activity
_____ Conditionally Exempt SQG (CESQG)	__X__ Containers
_____ Small Quantity Generator (SQG)	_____ Tank(s)
__X__ Large Quantity Generator (LQG)	__X__ Land Disposal Requirements (LDR)
_____ No Generation	_____ Used Oil
	__X__ Universal Waste
	_____ Other

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

POLLUTION PREVENTION

1. Has the company undertaken any P2 activities to reduce the amount of hazardous waste generated? Yes _X_ No__ N/A ___ RMK#__

   a. ***If so,*** what has the company done to minimize hazardous waste generation?

   - ❑ A change in the process resulting in less waste.
   - ❑ A change in the product resulting in less waste.
   - ❑ Use of fewer and less toxic hazardous raw materials.
   - ❑ Better operations/improved housekeeping.
   - ❑ On-site recycling/reuse of hazardous materials.
   - ■ Sending waste off-site for recycling/reuse.
   - ❑ Other activities (specify): _____

   b. ***If so,*** what hazardous wastes have been addressed?

   - ❑ Solvents
   - ❑ Paint related wastes
   - ❑ Industrial process wastes (sludges, slags, contaminated waste waters, etc)
   - ❑ Contaminated oils/hydraulic fluids
   - ❑ Off-spec chemicals
   - ■ Fluorescent light bulbs
   - ■ Used batteries
   - ❑ Shop rags
   - ❑ Other (specify): _____

   c. ***If not,*** why hasn't the company considered P2?

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

2. Does the company plan to do P2 activities in the future? Yes_X_ No ___ N/A ___ RMK#__

3. Would the company be interested in receiving additional information from Ohio EPA about P2? Yes_X_ No___ N/A ___ RMK#__

4. Did you give the company information about P2 during the inspection? Yes_X_ No___ N/A ___ RMK#__

5. Would the company like a P2 assessment? Yes___ No_X_ N/A ___ RMK#__

6. If the company does not want a P2 assessment, why not? Company has a program in place.

LARGE QUANTITY GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] — Yes__ No ■ N/A ___RMK#_1_

2. Has the generator obtained an identification number? [3745-52-12] — Yes _X_ No ❑ N/A ___RMK#___

3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41] — Yes _X_ No ❑ N/A ___RMK#___

WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? If so: — Yes ___ No_X_ N/A ___RMK#___

   a. Has the generator notified U.S. EPA of export/import activity? [3745-52-53] — Yes ___ No ❑ N/A _X_RMK#___

   b. Has the generator complied with special manifest requirements? [3745-52-54] — Yes ___ No ❑ N/A _X_RMK#___

   c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] — Yes ___ No ❑ N/A _X_RMK#___

   d. Has an annual report been submitted to U.S. EPA? [3745-52-56] — Yes ___ No ❑ N/A _X_RMK#___

   e. Are export related documents being maintained on-site? [3745-52-57] — Yes ___ No ❑ N/A _X_RMK#___

GENERATOR CLOSURE REQUIREMENTS

5. Has the generator closed any <90-day accumulation unit(s) since the date of the last inspection? If so: — Yes ___ No_X_ N/A ___RMK#___

   a. Describe the unit(s) which the generator has closed.

   b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] — Yes ___ No ❑ N/A_X_RMK#___

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

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

REMARKS

#1 UO3 has not been adequately evaluated.

MANIFEST REQUIREMENTS

Are you aware of what the statement that you sign on the manifest says? Yes X No___

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

2. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] — Yes _X_ No ❑ N/A ___RMK#___

NOTE: ***U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]***

3. Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)] — Yes _X_ No ❑ N/A ___RMK#___

NOTE: ***The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]***.

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

   a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] — Yes ___ No ❑ N/A _X_ RMK#___

5. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)] — Yes _X_ No ❑ N/A ___RMK#___

6. Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not: — Yes _X_ No_ N/A ___RMK#___

   a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)] — Yes _ No ❑ N/A _X_ RMK#___

   b. If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] — Yes ___ No ❑ N/A _X_ RMK#___

7. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] — Yes _X_ No ❑ N/A ___RMK#___

PERSONNEL TRAINING

1. Does the generator keep records required by 3745-65-16(D) including:

   a. Job titles, as they relate to hazardous waste management, and the name of each employee filling each job? Yes _X_ No ❑ N/A ___RMK#___

   b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position? Yes _X_ No ❑ N/A ___RMK#___

   c. Type and amount of both introductory and continuing training to be given to each person filling a position? Yes _X_ No ❑ N/A ___RMK#___

   d. Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)? Yes _X_ No ❑ N/A ___RMK#___

NOTE: ***If the facility's business practices precludes written job titles/descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be used to document that all necessary employees have been trained.***

2. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to their positions? [3745-65-16(A)(2) Yes _X_ No ❑ N/A ___RMK#___

3. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]

   a. Emergency procedures? Yes _X_ No ❑ N/A ___RMK#___

   b. Emergency equipment? Yes _X_ No ❑ N/A ___RMK#___

   c. Emergency systems? Yes _X_ No ❑ N/A ___RMK#___

4. Does emergency training described in 3(a), (b) and (c) above include, *where applicable*: [3745-65-16(A)(3)(a-f)

   a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? Yes _X_ No ❑ N/A ___RMK#___

b. Key parameters for automatic waste feed cut-off systems? Yes _X_ No ❑ N/A ___RMK#___

c. Communication or alarm system? Yes _X_ No ❑ N/A ___RMK#___

d. Response procedures for fire/explosions? Yes _X_ No ❑ N/A ___RMK#___

e. Response to groundwater contamination incidents? Yes _X_ No ❑ N/A ___RMK#___

f. Shutdown procedures? Yes _X_ No ❑ N/A ___RMK#___

5. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes _X_ No ❑ N/A ___RMK#___

6. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes _X_ No ❑ N/A ___RMK#___

7. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes _X_ No ❑ N/A ___RMK#___

8. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)] Yes _X_ No ❑ N/A ___RMK#___

9. Are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes _X_ No ❑ N/A ___RMK#___

REMARKS

CONTINGENCY PLAN

1. Does the generator have a contingency plan which describes the following: [3745-65-52(A) through (F)]

   a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? — Yes __ No ■ N/A ___ RMK# 3

   b. Arrangements/agreements with emergency authorities? [3745-65-37] — Yes _X_ No ❑ N/A ___ RMK#___

   c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? — Yes _X_ No ❑ N/A ___ RMK#___

   d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? — Yes _X_ No ❑ N/A ___ RMK#___

   e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary? — Yes _X_ No ❑ N/A ___ RMK#___

NOTE: ***If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]***

2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] — Yes _X_ No ❑ N/A ___ RMK#___

3. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)(B)] — Yes _X_ No ❑ N/A ___ RMK#___

4. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] — Yes _X_ No ❑ N/A ___ RMK#___

EMERGENCY COORDINATOR

5. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] — Yes _X_ No ❑ N/A ___ RMK#___

NOTE: ***The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan***

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes ___ No X N/A ___ RMK#___

   a. Was the contingency plan implemented? [3745-65-51(B)] Yes ___ No ❑ N/A _X_ RMK#___

   b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes ___ No ❑ N/A _X_ RMK#___

   c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes ___ No ❑ N/A _X_ RMK#___

NOTE: ***OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.***

REMARKS

#3 The contingency plan states that OEPA will only be contacted when a release has a direct impact on the environment outside the reservation boundary...". The OEPA must be contacted whenever the contingency plan has been implemented.

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

1. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] — Yes _X_ No ❑ N/A ___ RMK#___

2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]

   a. Internal alarm system? — Yes _X_ No ❑ N/A ___ RMK#___

   b. Emergency communication device? — Yes _X_ No ❑ N/A ___ RMK#___

   c. Portable fire control, spill control and decon equipment? — Yes _X_ No ❑ N/A ___ RMK#___

   d. Water of adequate volume/pressure? — Yes _X_ No ❑ N/A ___ RMK#___

3. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] — Yes _X_ No ❑ N/A ___ RMK#___

4. Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33] — Yes _X_ No ❑ N/A ___ RMK#___

5. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32)*? [3745-65-34] — Yes _X_ No ❑ N/A ___ RMK#___

6. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] — Yes _X_ No ❑ N/A ___ RMK#___

7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] — Yes _X_ No ❑ N/A ___ RMK#___

   a. Where authorities have declined to enter into arrangements/agreements, has the generator documented such a refusal? [3745-65-37(B)] — Yes ___ No ❑ N/A _X_ RMK#___

REMARKS

GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)] Yes No X N/A ___RMK#_

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

2. Does the generator ensure that satellite accumulation area(s):

   a. Are at or near a point of generation? Yes X No ❑ N/A ___RMK#___

   b. Are under the control of the operator of the process generating the waste? Yes X No ❑ N/A ___RMK#___

   c. Do not exceed a total of 55 gallons of hazardous waste? Yes X No___ N/A ___RMK#___

   d Do not exceed one quart of acutely hazardous waste at any one time? Yes X No ❑ N/A ___RMK#___

   e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? Yes X No ❑ N/A ___RMK#___

NOTE: The 55 gallon limit applies to the area itself, and not to each individual waste stream accumulated in the area. The inspector should refer to Ohio EPA's November 1994 Guidance on the Location of Satellite Accumulation Areas.

3. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so: Yes ___ No X N/A ___RMK#___

   a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? Yes ___ No ❑ N/A X RMK#___

   b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? Yes ___ No ❑ N/A X RMK#___

USE AND MANAGEMENT OF CONTAINERS

4. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes X No ❑ N/A ___RMK#___

5. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes _X_ No ❑ N/A ___RMK#___

6. Are hazardous wastes stored in containers which are:

   a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes _X_ No ❑ N/A ___RMK#___

   b. In good condition? [3745-66-71] Yes _X_ No ❑ N/A ___RMK#___

   c. Compatible with wastes stored in them? [3745-66-72] Yes _X_ No ❑ N/A ___RMK#___

   d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes _X_ No ❑ N/A ___RMK#___

7. Is the container accumulation area(s) inspected weekly? [3745-66-74] (*Note location in general information section of checklist)* Yes _X_ No ❑ N/A ___RMK#___

   a. Are inspections recorded in a log or summary? [3745-66-74] Yes _X_ No ❑ N/A ___RMK#___

8. For ignitable and/or reactive hazardous waste(s):

   a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes _X_ No ❑ N/A ___RMK#___

   b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] Yes _X_ No ❑ N/A ___RMK#___

PRE-TRANSPORT REQUIREMENTS

9. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] Yes _X_ No ❑ N/A ___RMK#___

10. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes _X_ No ❑ N/A ___RMK#___

11. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes _X_ No ❑ N/A ___RMK#___

REMARKS

LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] **If so**: Yes X No ❑ N/A ___RMK#__

   a. **For determinations based solely on knowledge of the waste:** Is supporting data retained on-site? [3745-270-07(A)(6)] Yes X No ❑ N/A ___RMK#___

   b. **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-270-07(A)(6)] _RMK#___

2. Has the generator determined each Ohio EPA hazardou waste code applicable to the waste? [3745-270-07(A)(2) see Table 1] _RMK#___

3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes X No ❑ N/A ___RMK#___

4. Does the generator generate a characteristic hazardous waste? **If so:** Yes X No___ N/A ___RMK#___

   a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes X No ❑ N/A ___RMK#___

NOTE: *If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.*

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] **If so:** Yes X No___ N/A ___RMK#___

   a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes X No ❑ N/A ___RMK#___

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]*

6. Has the generator **correctly** determined if restricted wastes meet or exceed treatment standards? [3745-270-07(A)(1)] Yes X No ❑ N/A ___RMK#___

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

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

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

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes ❑ No___ N/A X RMK#___

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] **If so:** Yes___ No X N/A ___RMK#___

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

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

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

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

    a. Has the facility complied with 3745-270-04? Yes ___ No ❑ N/A X RMK#___

REMARKS

NOTIFICATION AND CERTIFICATION REQUIREMENTS

12. If a generators' waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1? [3745-270-07(A)(2)] — Yes _X_ No ❑ N/A ___ RMK#___

13. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1? [3745-270-07(A)(3)] — Yes_X__ No ❑ N/A __RMK#___

14. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1? [3745-270-07(A)(4)] — Yes ___ No ❑ N/A _X_RMK#___

15. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1? [3745-270-07(A)(9)] — Yes ___ No ❑ N/A _X_RMK#___

16. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] **If so:** — Yes ___ No_X_N/A ___ RMK#___

    a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] — Yes ___ No ❑ N/A _X_ RMK#___

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

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

REMARKS

LARGE QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

GENERAL REQUIREMENTS

1. Has the LQUWH obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)] — Yes _X_ No ❑ N/A _ RMK#___

PROHIBITIONS

2. Did the LQUWH dispose of universal waste? [3845-273-31(A)] — Yes ❑ No X N/A ___ RMK#___

3. Did the LQUWH dilute or treat universal waste, except when responding to releases or by managing specific wastes as provided in OAC 3745-273-33? [3745-273-31(B)] — Yes ❑ No _X_ N/A _ RMK#___

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES:

4. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)] — Yes _X_ No ❑ N/A _ RMK#___

5. If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? — Yes _X_ No ❑ N/A _ RMK#___

6. Does the LQUWH conduct any of the following activities:

   a. Sort batteries by type? — Yes _X_ No ___ N/A ___ RMK#___

   b. Mix battery types in one container? — Yes ___ No _X_ N/A ___ RMK#___

   c. Discharge batteries to remove the electric charge? — Yes ___ No _X_ N/A ___ RMK#___

   d. Regenerate used batteries? — Yes ___ No _X_ N/A ___ RMK#___

   e. Disassemble them into individual batteries or cells? — Yes ___ No _X_ N/A ___ RMK#___

   f. Remove batteries from consumer products? — Yes _X_ No ___ N/A ___ RMK#___

   g. Remove the electrolyte from the battery? — Yes ___ No _X_ N/A ___ RMK#___

   If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-33(A)(2)] — Yes ❑ No ___ N/A _X_ RMK#___

7. If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)] — Yes ___ No ❑ N/A _X_ RMK#___

   a. If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)] — Yes ___ No ❑ N/A _X_ RMK#___

   b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)] — Yes ___ No ❑ N/A _X_ RMK#___

8. Are the battery(ies) or container(s) of batteries located with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-34(A)] — Yes ___ No ■ N/A ___ RMK#_1_

UNIVERSAL WASTE LAMPS

9. Does the LQUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(D)(1) — Yes _X_ No ❑ N/A ___RMK#___

10. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous constituents to the environment? [3745-273-33(D)(2)] — Yes ___ No ❑ N/A_X__RMK#___

11. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous constituents to the environment? [3745-273-33(D)(2)] — Yes ___ No ❑ N/A _X__RMK#___

12. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamps?" [3745-273-34(E)] — Yes ___ No ■ N/A _ RMK# 1

Does the LQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-33(B)(1)] — Yes ___ No❑ N/A X RMK# ___

13. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-33(B)(2)] — Yes ___ No ❑ N/A X RMK#___

14. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 66-992, except for paragraph (C) of 3745-66-97; rule 3745-66-991 and 3745-66-992 of the OAC met? [3745-273-33(B)(3)] — Yes ___ No ❑ N/A X RMK#___

15. Is pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-33(B)(4)] — Yes ___ No ❑ N/A X RMK#___

16. Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)] — Yes ___ No ❑ N/A X RMK#___

17. Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)] — Yes ___ No ❑ N/A X RMK#___

UNIVERSAL WASTE THERMOSTATS

18. Are thermostats that show evidence of leakage, spillage or damage that could cause leaks, properly contained? [3745-273-33(C)(1)] — Yes ___ No ❑ N/A X RMK#___

19. If the thermostats are contained, are the containers closed, structurally sound, compatible with contents of the thermostats and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(C)(1)] — Yes ___ No ❑ N/A X RMK#___

20. If the mercury-containing ampules are removed, does the LQUWH: [3745-273-33(C)(1)]

a. Remove the ampules in a manner to prevent breakage and is the removal done over a containment device? [3745-273-33(C)(2)(a)(b)] Yes ___ No ❑ N/A X RMK#___

b. Have a clean-up system readily available to transfer spilled material to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-33(C)(2)(c)(d)] Yes ___ No ❑ N/A X RMK#___

c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-33(C)(2)(e)] Yes ___ No ❑ N/A X RMK#___

d. Ensure employees are thoroughly familiar with proper waste handling and emergency procedures? [3745-273-33(C)(2)(f)] Yes ___ No ❑ N/A X RMK#___

e. Ensure removed ampules are stored in closed, non-leaking containers that are in good condition? [3734-273-33(C)(2)(g)] Yes ___ No ❑ N/A X RMK#___

f. Pack removed ampules in containers with packing material to prevent breaking during storage, handling and transportation? [3745-273-33(C)(2)(h)] Yes ___ No ❑ N/A X RMK#___

21. If mercury or clean-up residues resulting from spills or leaks or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-33(C)(3)(a)] Yes ___ No ❑ N/A X RMK#___

a. If the waste is characteristic, was it managed in compliance with 3745-50 through 3745-69? (*The handler is considered the generator of the mercury, residues, and/or other waste and is subject to Chapter 3745-52)* [3745-273-33(C)(3)(b)] Yes ___ No ❑ N/A X RMK#___

b. If the mercury, residues and/or other waste are not hazardous, are they managed in compliance with applicable law? [3745-273-33(C)(3)(c)] Yes ___ No ❑ N/A X RMK#___

22. Are the thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)" [3745-273-34] Yes ___ No ❑ N/A X RMK#___

ACCUMULATION TIME

23. Is the waste accumulated for less than one year? [3745-273-35(A)] — Yes X No ___ N/A ___ RMK#___

    a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on handler to demonstrate) [3745-273-35(B)] — Yes ___ No ❑ N/A X RMK#___

NOTE: ***Accumulation is defined as date generated or date received from another handler.***

24. Has the length of time the universal waste has been accumulated documented by ***one*** of the following: [3745-273-35(C)] — Yes X No ❑ N/A ___ RMK#___

    a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-35(C)(1)] — Yes X No _ N/A ___ RMK#_

    b. Marking or labeling the individual item of universal waste with the date that it became a waste or was received? [3745-273-35(C)(2)] — Yes ___ No X N/A ___ RMK#___

    c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-35(C)(3)] — Yes X No _ N/A ___ RMK#___

    d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-35(C)(4)] — Yes ___ No X N/A ___ RMK#___

    e. Placing the universal waste in a specific accumulation area and identifying the earliest that any universal waste in the area became a waste or was received? [3745-273-35(C)(5] — Yes X No _ N/A ___ RMK#___

    f. Any other method which clearly demonstrates the length of time the universal waste has been accumulated from the date it became a waste or is received? [3745-273-35(C)(6)] — Yes ___ No _ N/A X RMK#___

EMPLOYEE TRAINING

25. Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36] — Yes X No ❑ N/A ___ RMK#___

RESPONSE TO RELEASES

26. Were releases of universal waste and other residues immediately contained? [3745-273-37(A)] — Yes ___ No ❑ N/A _X_ RMK#___

27. Was the released material characterized? [3745-273-37(B)] — Yes ___ No ❑ N/A _X_ RMK#___

28. If the released material was a hazardous waste, was it managed as required in OAC 3745-50 through 3745-69? *(If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52)* [3745-273-37(C)] — Yes ___ No ❑ N/A _X_ RMK#___

OFF-SITE SHIPMENTS

NOTE: ***If a LQUWH self-transports wastes, then the handler must comply with the Universal Waste transporter requirements.***

29. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)] — Yes _X_ No ❑ N/A ___ RMK#___

NOTE: ***LQUWHs are prohibited to send waste to any other facility.***

30. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-38(C)] — Yes _X_ No ❑ N/A ___ RMK#___

31. Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)] — Yes _X_ No ❑ N/A ___ RMK#___

32. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do <u>one of the following</u>: — Yes ___ No ❑ N/A _X_ RMK#___

    a. Receive the waste back? [3745-273-38(E)(1)] — Yes___ No___ N/A _X_RMK#___

    b. Agree to where shipment will be sent? [3745-273-38(E)(2)] — Yes___ No___ N/A _X_RMK#___

33. If a handler rejects a partial or full load from another handler, does the receiver handler contact the originating handler and discuss <u>one of the following</u>: — Yes ___ No ❑ N/A _X_ RMK#___

    a. Sending the waste back to originating handler? [3745-273-38(F)(1)] — Yes___ No___ N/A _X_RMK#___

    b. Sending the shipment to a destination facility? [3745-273-38(F)(2)] — Yes___ No___ N/A _X_RMK#___

34.	If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)]	Yes ___ No ❑ N/A _X_ RMK#___
35.	If the handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-38(H)]	Yes ___ No ❑ N/A _X_ RMK#___

TRACKING UNIVERSAL WASTE SHIPMENTS

36. Are universal waste received from another handler? If so: Yes___ No X N/A ___RMK#___

a. Is a record of each shipment kept? [3745-273-39(A)] Yes ___ No ❑ N/A X RMK#___

NOTE: ***This record can be in the form of a log, invoice, manifest, bill of lading, or other shipping document. This also applies to question No. 35(a).***

37. Does the record include the following:

a. Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)] Yes ___ No ❑ N/A X RMK#___

b. Quantity of each type of universal waste? [3745-273-39(A)(2)] Yes ___ No ❑ N/A X RMK#___

c. Date received? [3745-273-39(A)(3)] Yes ___ No ❑ N/A X RMK#___

38. Is universal waste shipped to another handler? If so: Yes___ No___ N/A X RMK#___

a. Is a record of each shipment kept? [3745-273-39(B)] Yes ___ No ❑ N/A X RMK#___

39. Does the record include the following?

a. Name and address of universal waste handler, destination facility, or foreign destination? [3745-273-39(B)(1)] Yes ___ No ❑ N/A X RMK#___

b. Quantity of each type of universal waste? [3745-273-39(B)(2)] Yes ___ No ❑ N/A X RMK#___

c. Date shipped? [3745-273-39(B)(3)] Yes ___ No ❑ N/A X RMK#___

40. Are records kept for three years? [3745-273-39(C)(1)(2)] Yes X No ❑ N/A ___ RMK#___

EXPORTS

41. Is waste being sent to a foreign destination? If so: Yes ___ No X N/A ___ RMK#___

a. Does the large quantity handler comply with primary exporter requirements in OAC rules 3745-52-53 and 3745-52-57, and paragraphs (A)(1) - (A)(6) and (B) of 3745-52-56? [3745-273-40(A)] Yes ___ No ❑ N/A X RMK#___

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA "Acknowledgment of Consent" 37845-52-50 to -52-57? [3745-273-40(B)] Yes ___ No ❑ N/A X RMK#___

c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)]

Yes ___ No ❑ N/A _X_ RMK# ___

REMARKS

#1 The waste batteries and waste lamps were not labeled as required.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 0 9 2005

REPLY TO THE ATTENTION OF DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William E. Murphie
Manager
Portsmouth/Paducah Project Office
U.S. Department of Energy
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

Mr. Michael C. Hughes
President and General Manager
Bechtel Jacobs Company LLC
P.O. Box 4699
Oak Ridge, Tennessee 37831

Re: Letter of Acknowledgment
RCRA Compliance Evaluation Inspection
U.S. Department of Energy - Gaseous Diffusion Plant
Piketon, Ohio
OH7 890 008 983

Dear Messrs. Murphie and Hughes:

On July 12, 2005, the United States Environmental Protection Agency (U.S. EPA) issued U.S. Department of Energy (DOE) Portsmouth Gaseous Diffusion Plant a Notice of Violation (NOV) which identified a violation of the Ohio Administrative Code and a Resource Conservation and Recovery Act (RCRA) Permit violation at the Piketon, Ohio facility.

U.S. EPA received an April 11, 2005, letter from U.S. DOE and a July 27, 2005, response letter from Bechtel Jacobs Company LLC to the July 12, 2005, NOV.

This letter is to inform you that U.S. EPA has reviewed your responses and determined that additional enforcement action need not be taken at this time.

This position does not limit your liability for compliance with all the applicable provisions of the Resource Conservation and Recovery Act, as amended. Your hazardous waste management operations will continue to be evaluated by U.S. EPA and the Ohio Environmental Protection Agency (OEPA) in the future.

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 50% Recycled Paper (20% Postconsumer)

If you have any questions regarding this letter, please contact Walt Francis of my staff at (312) 353-4921.

Sincerely yours,

Paul Little, Chief
Compliance Section #2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

cc: Melody Stewart, OEPA-Southeast District Office

BECHTEL JACOBS
Bechtel Jacobs Company LLC

DOE Contract No. DE-AC05-03OR22980
Job No. 23900
WD-05-026
April 7, 2005

Mr. William E. Murphie, Manager
Portsmouth/Paducah Project Office
U.S. Department of Energy
1017 Majestic Drive, Suite 200
Lexington, KY 40513

Dear Mr. Murphie:

DE-AC05-03OR22980: Portsmouth Gaseous Diffusion Plant (PORTS) RCRA Inspection - Land Disposal Restriction Notification Form

On March 8-9, 2005, the United States and Ohio Environmental Protection Agencies conducted a RCRA inspection of the DOE PORTS site. During this inspection, the agencies identified a deficient Land Disposal Restriction (LDR) notification form that was being used. This discovery indicated that LDR notification forms for waste shipments to Envirocare did not identify whether waste met the definition of wastewater or non-wastewater as required by OAC 3745-270-07(A)(4).

Bechtel Jacobs Company LLC (BJC) subcontractor, Wastren, Inc. (WASTREN) immediately acted to inform the Treatment Storage Disposal Facility (TSDF) that the LDR notification form in use was inadequate to meet generator paperwork requirements. An updated LDR form was provided by the TSDF to WASTREN on March 9, 2005.

WASTREN reviewed all forms identified as deficient during the inspection, corrected the forms, and hand-delivered the corrected forms by March 24, 2005 to an Envirocare onsite representative, who provided them to the disposal facility on March 28, 2005. Enclosed are the updated LDR forms provided by the TSDF on March 9, 2005 (Attachment A) and the corrected forms hand-delivered to the Envirocare representative (Attachment B).

BJC will review the new WASTREN forms as part of the shipping documentation review process. As an additional corrective action, WASTREN will now include LDR forms with transportation packages provided for BJC review. WASTREN will maintain the policy of providing LDR forms with each shipment.

Attached are suggested letters to Ohio EPA and U.S. EPA for your use.

If you have any questions, please contact Lew Goidell at (740) 897-3844.

Sincerely,

John J. Meersman
Manager of Projects

JJM/LCG/GCU/sd

Enclosures: As stated

cc/enc:

Sandy Childers
Lew Goidell
Jackie France
Greg Uetrecht
File—DMC—RC
File—STR—File
File —Waste Disposition
Melda Rafferty, DOE-PORTS
Rosemary Richmond
Patrick Willison
Scott Kelley
Administrative Records (J. Croswait, MS-7614)

Ms. Melody Stewart
Ohio Environmental Protection Agency
Southeast District Office
2195 Front Street
Logan, OH 43138

Dear Ms. Stewart:

Portsmouth Gaseous Diffusion Plant (PORTS) RCRA Inspection - Land Disposal Restriction Notification Form

On March 8-9, 2005, the United States and Ohio Environmental Protection Agencies conducted a RCRA inspection of the DOE PORTS site. During this inspection, the agencies identified a deficient Land Disposal Restriction (LDR) notification form that was being used. This discovery indicated that LDR notification forms for waste shipments to Envirocare did not identify whether waste met the definition of wastewater or non-wastewater as required by OAC 3745-270-07(A)(4).

The Bechtel Jacobs Company LLC (BJC) subcontractor, Wastren, Inc. (WASTREN) immediately acted to inform the Treatment Storage Disposal Facility (TSDF) that the LDR notification form in use was inadequate to meet generator paperwork requirements. An updated LDR form was provided by the TSDF to WASTREN on March 9, 2005.

WASTREN reviewed all forms identified as deficient during the inspection, corrected the forms, and hand-delivered the corrected forms by March 24, 2005 to an Envirocare onsite representative, who provided them to the disposal facility on March 28, 2005. Enclosed are the updated LDR forms provided by the TSDF on March 9, 2005 (Attachment A) and the corrected forms hand-delivered to the Envirocare representative (Attachment B).

BJC will review the new WASTREN forms as part of the shipping documentation review process. As an additional corrective action, WASTREN will now include LDR forms with transportation packages provided for BJC review. WASTREN will maintain the policy of providing LDR forms with each shipment.

If you have any questions, please contact Melda Rafferty of my staff at (740) 897-5521.

Sincerely,

William E. Murphie
Manager
Portsmouth/Paducah Project Office

Enclosure: As stated

cc w/enclosure:
M. Savage, OEPA/Columbus
Administrative Records

cc w/o enclosure:
W. Francis, USEPA Region5
R. Blumenfeld, PPPO/LEX
M. Rafferty, PPPO/PORTS
J. Meersman, BJC/PORTS

Mr. Walt S. Francis
U.S. Environmental Protection Agency, Region 5
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division
77 West Jackson Boulevard
Chicago, IL 60604-3590

Dear Mr. Francis:

Portsmouth Gaseous Diffusion Plant (PORTS) RCRA Inspection - Land Disposal Restriction Notification Form

On March 8-9, 2005, the United States and Ohio Environmental Protection Agencies conducted a RCRA inspection of the DOE PORTS site. During this inspection, the agencies identified a deficient Land Disposal Restriction (LDR) notification form that was being used. This discovery indicated that LDR notification forms for waste shipments to Envirocare did not identify whether waste met the definition of wastewater or non-wastewater as required by OAC 3745-270-07(A)(4).

The Bechtel Jacobs Company LLC (BJC) subcontractor, Wastren, Inc. (WASTREN) immediately acted to inform the Treatment Storage Disposal Facility (TSDF) that the LDR notification form in use was inadequate to meet generator paperwork requirements. An updated LDR form was provided by the TSDF to WASTREN on March 9, 2005.

WASTREN reviewed all forms identified as deficient during the inspection, corrected the forms, and hand-delivered the corrected forms by March 24, 2005 to an Envirocare onsite representative, who provided them to the disposal facility on March 28, 2005. Enclosed are the updated LDR forms provided by the TSDF on March 9, 2005 (Attachment A) and the corrected forms hand-delivered to the Envirocare representative (Attachment B).

BJC will review the new WASTREN forms as part of the shipping documentation review process. As an additional corrective action, WASTREN will now include LDR forms with transportation packages provided for BJC review. WASTREN will maintain the policy of providing LDR forms with each shipment.

If you have any questions, please contact Melda Rafferty of my staff at (740) 897-5521.

Sincerely,

William E. Murphie
Manager
Portsmouth/Paducah Project Office

Enclosures: As stated
cc w/enclosures:
Administrative Records

cc w/o enclosures:
M. Savage, OEPA/Columbus
M. Stewart, OEPA/Logan
R. Blumenfeld, PPPO/LEX
M. Rafferty, PPPO/PORTS
J. Meersman, BJC/PORTS

ATTACHMENT
A

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

Generator Name _____ Manifest Doc. No _____

Profile No. _____ State Manifest No.: _____

1. Is this waste a non-wastewater or wastewater? (See 40 CFR 268.2) Check ONE: Non-wastewater ☐ Wastewater ☐
2. Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory. Spent solvent standards are listed on the following page. If F039, multi-source leachate applies those constituents must be listed and attached by the generator. If D001-D043 requires treatment of the characteristic and meet 268.48 standards, then the underlyi hazardous constituent(s) present in the waste must be listed and attached.

	USEPA HAZARDOUS WASTE CODE	SUBCATEGORY (ENTER APPROPRIATE SUBCATEGORY DESCRIPTION) (IF NOT APPLICABLE SUBCATEGORY, ENTER NONE)		CONSTITUENTS (IF WASTE IS F039 OR D001-D043 ENTER CONSTITUENT)
		DESCRIPTION	NONE	
1			☐	
2			☐	
3			☐	
4			☐	

identify F039 or D001-D043 underlying hazardous constituent (s), use the "F039/Underlying Hazardous Constituent Form" provided (Form B1) and check here ☐
lo UHCs are present in the waste upon its initial generation check here: ☐
list additional USEPA waste code(s) and subcategorie(s), use the supplemental sheet provided (Form A2) and check here: ☐

W MUST THE WASTE BE MANAGED? In column 5 above, enter the letter (A, B1, B3, B4, C, D, or E) below that describes how the waste must be managed to comply with the lan posal regulations (40 CFR 268.7). Please understand that if you enter the letter B1, B3, B4, or D, you are making the appropriate certification as provided below. (States authorized A to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deeme efer to those state citations instead of the 40 CFR citations.

Or ✗ **RESTRICTED WASTE REQUIRES TREATMENT**
This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.
☐ For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion in units as specified in 268.42 Table 1. I have been unable to detect the nonwastewater organic constituents despite having used best good faitl efforts to analyze for such constituents I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS
"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268 40 or 268 49, to remove the hazardous characteristic This decharacterized waste contains underlying hazardous constituents that require further treatment to meet treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

RESTRICTED WASTE SUBJECT TO A VARIANCE
This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 5 above
☐ For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT
"I certify under penalty of law I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D. I believe that the information I submitted is true, accurate and complet I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS
This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions

reby certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information

ature_____ Title_____ Date_____

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM (PHASE IV) – REVERSE SIDE

ie waste identified on the first page of this form is described by any of the following USEPA hazardous waste codes: F001, F002, F003, F004, F005, and all solvent constituents will be monitored by the treater, then each constituent MUST be identified below by checking the appropriate box, and this page must accompany the shipment, along with the previous ge of this form. If the waste code F039 describes this waste, then the corresponding list of constituents must be attached. If D001-D043 require treatment to 268 48 standards, then t derlying hazardous constituent(s) must also be attached.

etone (F003)	0.28	160	Methanol (F003)	5 6	0.75 (TCLP)
nzene (F005)	0 14	10	Methylene chloride (F001, F002)	0.089	30
lutanol (n-butyl alcohol) (F003)	5 6	2.6	Methyl ethyl ketone (F005)	0.28	36
rbon disulfide (F005)	3.8	4.8 (TCLP)	Methyl isobutyl ketone (F003)	0.14	33
rbon tetrachloride (F001)	0 057	6.0	Nitrobenzene (F004)	0.068	14
lorobenzene (F002)	0 057	6 0	2-Nitropropane (F005)	INCIN or ((WETOX or C HOXD) followed by CARBN)	INCIN
Cresol (F004)	0.11	5 6	Pyridine (F005)	0 014	16
esol (m- and p- isomers) (F004)	0 77	5.6	Tetrachloroethylene (F001, F002)	0.056	6.0
clohexanone (F003)	0.36	0 75 (TCLP)	Toluene (F005)	0.080	10
Dichlorobenzene (F002)	0.088	6 0	1,1,1-Trichloroethane (F001, F002)	0 054	6 0
Ethoxyethanol (F005) also called ylene glycol, monoethyl ether	INCIN or BIODG	INCIN	1,1,2-Trichloroethane (F002)	0 054	6 0
yl acetate (F003)	0 34	33	Trichloroethylene (F001, F002)	0 054	6.0
yl benzene (F003)	0.057	10	Trichloromonofluoromethane (F002)	0.020	30
yl ether (F003)	0.12	160	1,1,2-Trichloro-1,2,2-trifluoroethane (F002)	0 057	30
ob. l (Isobutyl Alcohol) (F005)	5 6	170	Xylenes (sum of o-, m-, and p-isomers) (F003)	0.32	30

ll spent solvent treatment standards are measured through a total waste analysis (TCA), unless otherwise noted. Wastewater units are mg/l, nonwastewater are mg/kg.

or contaminated soils using the alternative soil treatment standards, the treatment standards for F001-F005 spent solvents must be a 90% reduction of the constituents or less than 1 e standard listed.

SUBCATEGORY REFERENCE

001.

Ignitable characteristic wastes, except for the 40 CFR 261 21(a) (1) High TOC subcategory, that are managed in non-CWA/non-CWA equivalent/non-Class I SDWA systems.

Ignitable characteristic wastes, except for the 40 CFR 261 21(a) (1) High TOC subcategory, that are managed in CWA/CWA-equivalent or Class I SDWA systems.

High TOC Ignitable characteristic liquids subcategory based on 40 CFR 261.21(a) (1) – Greater than or equal to 10% total organic carbon.

D002.

Corrosive characteristic wastes that are managed in non-CWA/non-CWA-equivalent/non-Class I SDWA systems.

Corrosive characteristic wastes that are managed in CWA, CWA-equivalent, or Class I SWDA systems

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM (PHASE IV)

Generator Name _____ Manifest Doc. No. _____

Profile No. _____ State Manifest No. _____

This form is a continuation from form A1 for a waste identified by more than five USEPA waste code/subcategory groups. This page by itself IS NOT an acceptable Land Disposal Notification and Certification Form.

Continue (from form A1, Page 1) to identify ALL USEPA hazardous wastes that apply to this waste shipment (as defined by 40 CFR 261). For each waste number, identify the corresponding subcategory (write in the description from 40 CFR 268.40, or check NONE if the waste does not have a subcategory.). Also identify in column 5 how the waste must be managed. Spent solvents are listed Form A1, Page 2. F039 constituent(s) and underlying hazardous constituent(s) if applicable, must be listed and attached.

	USEPA WASTE CODE	SUBCATEGORY DESCRIPTION (Write in the applicable subcategory description from 40 CFR 268.40)	NONE	MANAGEMENT METHOD (Enter the code from the list in Question 5 on Form A1, Page 1)
5			☐	
6			☐	
7			☐	
8			☐	
9			☐	
10			☐	
11			☐	
12			☐	
13			☐	
14			☐	
15			☐	
16			☐	
17			☐	
18			☐	
19			☐	
20			☐	
21			☐	
22			☐	
23			☐	
24			☐	
25			☐	
26			☐	
27			☐	
28			☐	
29			☐	
30			☐	
31			☐	
32			☐	
33			☐	
34			☐	
35			☐	

Identify F039 or D001-D043 underlying hazardous constituent(s), use the "F039/Underlying Hazardous Constituent Form: ☐

No UHCs are present in the waste upon its initial generation check here ☐

I hereby certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information.

Signature _____

Name _____ Date _____

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM (PHASE IV)

Generator Name _____ Manifest Doc. No. _____

Profile No. _____ State Manifest No.. _____

This form is a continuation from form A1 for a waste identified by more than five USEPA waste code/subcategory groups. This page by itself IS NOT an acceptable Land osal Notification and Certification Form

ntinue (from form A1, Page 1) to identify ALL USEPA hazardous wastes that apply to this waste shipment (as defined by 40 CFR 261). For each waste number, identif the corresponding subcategory (write in the description from 40 CFR 268.40, or check NONE if the waste does not have a subcategory.). Also identify in column 5 how th waste must be managed. Spent solvents are listed Form A1, Page 2. F039 constituent(s) and underlying hazardous constituent(s) if applicable, must be listed and attached.

			NONE	
36			☐	
37			☐	
38			☐	
39			☐	
40			☐	
41			☐	
42			☐	
43			☐	
44			☐	
45			☐	
46			☐	
47			☐	
48			☐	
49			☐	
50			☐	
51			☐	
52			☐	
53			☐	
54			☐	
55			☐	
56			☐	
57			☐	
58			☐	
59			☐	
60			☐	
61			☐	
62			☐	
63			☐	
64			☐	
65			☐	
66			☐	

dentify F039 or D001-D043 underlying hazardous constituent(s), use the "F039/Underlying Hazardous Constituent Form ☐

o UHCs are present in the waste upon its initial generation check here: ☐

by certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information.

ature _____

_____ Date _____

F039/UNDERLYING HAZARDOUS CONSTITUENT FORM (UTS)
(Phase IV)

Generator Name:_____ **Manifest Doc. Number:** _____

Profile Number: _____ **State Manifest No.:** _____

If D001-D043 requires treatment to the 40 CRF 268 48 standards, then each underlying hazardous constituent (UHC) present in the waste at the point generation and at a level above the Universal Treatment Standard (UTS) constituent specific standard must be listed. Write the letter (A, B1, B3, or C th corresponds to the letter on the land disposal form A1) beside each constituent present to properly describe how the constituent(s) must be managed under 4(CFR 268.7 If contaminated soil requires treatment to 40 CFR 268.49 standards, then each UHC in the waste at the point of generation and at a level above 1 times the UTS must be listed Write the appropriate letter which corresponds to the letter on the LDR form

CONSTITUENT	HOW MUST THIS CONSTITUENT BE MANAGED?	WW (mg/l)	NWW (mg/kg) unless noted	CONSTITUENT	HOW MUST THIS CONSTITUENT BE MANAGED?	WW (mg/l)	NWW (mg/kg) unless noted
Acenaphthylene		0 059	3 4	2-Chloro-1,3-butadiene		0.057	0.28[1]
Acenapthene		0 059	3 4	Chlorodibromomethane		0 057	15
Acetone		0 28	160	Chloroethane		0 27	6.0
Acetonitrile		5 6	38[1]	bis(2-Chloroethoxy)methane		0 036	7 2
Acetophenone		0.010	9.7	bis(2-Chloroethyl)ether		0 033	6 0
2-Acetylaminofluorene		0 059	140	Chloroform		0 046	6 0
Acrolein		0 29	NA	bis(2-Chloroisopropyl)ether		0 055	7 2
Acylamide		19[1]	23[1]	p-Chloro-m-cresol		0 018	14
Acrylonitrile		0.24	84	2-Chloroethyl vinyl ether		0 062[1]	NA[1]
Aldicarb sulfone		0 056[1]	0.28[1]	Chloromethane/Methyl chloride		0 19	30
Aldrin		0 021	0.066	2-Chloronaphthalene		0 055	5 6
4-Aminobiphenyl		0 13	NA	2-Chlorophenol		0 044	5 7
Aniline		0.81	14	3-Chloropropylene		0 036	30
Anthracene		0 059	3 4	Chrysene		0 059	3 4
Aramite		0 36	NA	o-Cresol		0 11	5 6
alpha-(BHC)		0 00014	0 066	m-Cresol		0 77	5 6
beta-(BHC)		0 00014	0.066	p-Cresol		0 77	5 6
delta-(BHC)		0 023	0 066	m-Cumenyl methylcarbamate		0 056[1]	1 4[1]
gamma-(BHC)		0 0017	0 066	Cyclohexanone		0 36	0 75 mg/l[1]
Barban		0 056[1]	1 4[1]	o,p'-DDD		0 023	0 087
Bendiocarb		0 056[1]	1.4[1]	p,p'-DDD		0 023	0 087
Benomyl		0.056[1]	1 4[1]	o,p'-DDE		0 031	0 087
Benzene		0 14	10	p,p'-DDE		0 031	0 087
Benz(a)anthracene		0 059	3 4	o,p'-DDT		0 0039	0 087
Benzal chloride		0 055[1]	6 0[1]	p,p'-DDT		0 0039	0 087
Benzo(b)fluoranthene[2]		0 11	6 8	Dibenz(a,h)anthracene		0 055	8 2
Benzo(k)fluoranthene[2]		0.11	6 8	Dibenz(a,e)pyrene		0 061	NA
Benzo (g,h,i)perylene		0 0055	1.8	1,2-Dibromo-3-chloropropane		0 11	15
Benzo(a)pyrene		0 061	3 4	1,2-Dibromomethane/ Ethylene dibromide		0 028	15
Bromodichloromethane		0 35	15	Dibromomethane		0 11	15
Bromomethane/Methyl Bromide		0 11	15	m-Dichlorobenzene		0 036	6 0
4-Bromophenyl phenyl ether		0 055	15	o-Dichlorobenzene		0 088	6 0
n-Butyl alcohol		5 6	2 6	p-Dichlorobenzene		0 090	6 0
Butylate		0 042[1]	1 4[1]	Dichlorodifluoromethane		0 23	7 2
Butyl benzyl phthalate		0 017	28	1,1-Dichloroethane		0 059	6 0
2-sec-Butyl-4,6-dnitrophenol/Dinoseb		0 066	2 5	1,2-Dichloroethane		0 21	6 0
Carbaryl		0 006[1]	0.14[1]	1,1-Dichloroethylene		0 025	6 0
Carbenzadim		0 056[1]	1 4[1]	trans-1,2-Dichloroethylene		0 054	30
Carbofuran		0 006[1]	0 14[1]	2,4-Dichlorophenol		0 044	14
Carbofuran phenol		0 056[1]	1 4[1]	2,6-Dichlorophenol		0 044	11
Carbon disulfide		3 8	4 8 mg/l TCLP[1]	2,4-Dichlorophenoxyacetic acid/2,4-D		0 72	10
Carbon tetrachloride		0 057	6 0	1,2-Dichloropropane		0 85	18
Carbosulfan		0 028[1]	1 4[1]	cis-1,3-Dichloropropylene		0 036	18
Chlordane (alpha and gamma isomers)		0 0033	0 26	trans-1,3-Dichloropropylene		0 036	18
p-Chloroaniline		0 46	16	Dieldrin		0 017	0 13
Chlorobenzene		0 057	6 0	Diethyl phthalate		0 20	28
Chlorobenzilate		0 10	NA	p-Dimethylaminoazobenzene		0 13	NA

CONSTITUENT	HOW MUST THIS CONSTITUENT BE MANAGED?	WW (mg/l)	NWW (mg/kg) unless noted	CONSTITUENT	HOW MUST THIS CONSTITUENT BE MANAGED?	WW (mg/l)	NWW (mg/kg) unless noted
)imethyl phenol		0 036	14	Methylene chloride		0 089	30
ethyl phthalate		0 047	28	Methyl ethyl ketone		0.28	36
Di-n-butyl phthalate		0.057	28	Methyl isobutyl ketone		0 14	33
1,4-Dinitrobenzene		0 32	2 3	Methyl methacrylate		0 14	160
4,6-Dinitro-o-cresol		0 28	160	Methyl methansulfonate		0 018	NA
2,4-Dinitrophenol		0 12	160	Methyl parathion		0 014	4 6
2,4-Dinitrotoluene		0 32	140	Metolcarb		0 056[1]	1 4[1]
2,6-Dinitrotoluene		0 55	28	Mexacarbate		0 056[1]	1 4[1]
Di-n-octyl phthalate		0 017	28	Molinate		0.042[1]	1 4[1]
Di-n-propylnitrosamine		0 40	14	Naphthalene		0.059	5 6
1,4-Dioxane		12 0	170	2-Naphthylamine		0 52	NA
Diphenylamine[3]		0 92	13[1]	o-Nitroaniline		0 27[1]	14[1]
Diphenylnitrosamine[3]		0 92	13[1]	p-Nitroaniline		0 028	28
1,2-Diphenylhydrazine		0 087	NA	Nitrobenzene		0 068	14
Disulfoton		0 017	6.2	5-Nitro-o-toluidine		0 32	28
Dithiocarbamates (total)		0.028	28[1]	o-Nitrophenol		0.028[1]	13[1]
Endosulfan I		0.023	0 066	p-Nitrophenol		0 12	29
Endosulfan II		0 029	0.13	N-Nitrosodiethylamine		0 40	28
Endosulfan sulfate		0 029	0.13	N-Nitrosodimethylamine		0 40	2 3[1]
Endrin		0 0028	0 13	N-Nitroso-di-n-butylamine		0 40	17
Endrin aldehyde		0.025	0 13	N-Nitrosomethylethylamine		0 40	2 3
EPTC		0 042[1]	1 4[1]	N-Nitrosomorpholine		0 40	2 3
Ethyl acetate		0 34	33	N-Nitrosopiperidine		0 013	35
Ethyl benzene		0 057	10	N-Nitrosopyrrolidine		0.013	35
Ethyl cyanide/Propanenitrile		0 24	360	Oxamyl		0 056[1]	0.28[1]
Ethyl ether		0 12	160	Parathion		0 014	4.6
Bis(2-Ethylhexyl)phthalate		0 28	28	Total PCBs (sum of all PCB isomers or all Aroclors)		0 10	10
Ethyl methacrylate		0 14	160	Pebulate		0 042[1]	1.4[1]
Ethylene oxide		0 12	NA	Pentachlorobenzene		0 055[1]	10[1]
Famphur		0 017	15	PeCDDs (All Pentachlorodibenzo-p-dioxins)		0 000035	0 001
anthene		0.068	3 4	PeCDFs(All Pentachlorodibenzofurans)		0 000035	0 001
Fluorene		0 059	3 4	Pentachloroethane		0 055	6 0
Formetanate hydrochloride		0 056[1]	1 4[1]	Pentachloronitrobenzene		0 055	4 8
Heptachlor		0 0012	0 066	Pentachlorophenol		0.089	7 4
Heptachlor epoxide		0 016	0 066	Phenacetin		0.081	16
Hexachlorobenzene		0 055	10	Phenanthrene		0.059	5 6
Hexachlorobutadiene		0 055	5 6	Phenol		0 039	6 2
Hexachlorocyclopentadiene		0 057	2 4	Phorate		0 021	4 6
HxCDDs (All Hexachlorodibenzo-p-dioxins)		0 000063	0 001	Phthalic acid		0 055[1]	28[1]
HxCDFs (All Hexachlorodibenzofurans)		0 000063	0 001	Phthalic anhydride		0 055	28[1]
Hexachloroethane		0.055	30	Physostigmine		0 056[1]	1 4[1]
Hexachloropropylene		0 035	30	Physostigmine salicylate		0 056[1]	1 4[1]
Indeno(1,2,3-c,d)pyrene		0 0055	3 4	Promecarb		0 056[1]	1 4[1]
Iodomethane		0 19	65	Pronamide		0 093	1 5
Isobutyl alcohol		5 6	170	Propham		0 056[1]	1 4[1]
Isodrin		0 021	0 066	Propoxur		0 056[1]	1 4[1]
Isosafrole		0 081	2 6	Prosulfocarb		0 042[1]	1 4[1]
Kepone		0 0011	0 13	Pyrene		0 067	8 2
Methacrylonitrile		0 24	81	Pyridine		0 014	16
Methanol		5 6	0 75 mg/l[1]	Safrole		0 081	2 6
Methapyrilene		0 081	1 5	Silvex(2,4,5-TP)		0 72	7 9
Metolcarb		0 056[1]	1 4[1]	1,2,4,5-Tetrachlorobenzene		0 055	11
Mirex		0 0 21[1]	0 13[1]	TCDDs (All Tetrachlorodibenzo-p-dioxins)		0 000063	0 001
Naphthalene		0 25	0 13	TCDFs (All Tetrachlorodibenzofurans)		0 000063	0 001
Nitrobenzene		0 068	14	1,1,1,2-Tetrachloroethane		0 057	11
2-Nitropropane		1 0	30	1,1,2,2-Tetrachloroethane		0 055	11

CONSTITUENT	HOW MUST THIS CONSTITUENT BE MANAGED?	WW (mg/l)	NWW (mg/Kg) unless noted	CONSTITUENT	HOW MUST THIS CONSTITUENT BE MANAGED?	WW (mg/l)	NWW (mg/kg) unless noted
Tetrachloroethylene		0 056	6.0	INORGANIC CONSTITUENTS			
2,3,4,6-Tetrachlorophenol		0 030	7 4	Antimony		1 9	2 1 mg/l TCLP
Thiodicarb		0 019[1]	1 4[1]	Antimony		1 9	1 15 mg/l TCLP[4]
Thiophanate-methyl		0 056[1]	1.4[1]	Arsenic		1 4	5 0 mg/l TCLP
Toluene		0 080	10	Barium		1 2	7 6 mg/l TCLP
Toxaphene		0 0095	2 6	Barium		1 2	21 mg/l TCLP[4]
Triallate		0 042[1]	1 4[1]	Beryllium		0 82	0.014 mg/l TCLP
Tribromomethane/Bromoform		0 63	15	Beryllium		0 82	1 22 mg/l TCLP[4]
2,4,6-Tribromophenol		0.035	7 4	Cadmium		0 69	0 19 mg/l TCLP
1,2,4-Trichlorobenzene		0 055	19	Cadmium		0 69	0 11 mg/l TCLP[4]
1,1,1-Trichloroethane		0.054	6 0	Chromium (Total)		2 77	0 86mg/l TCLP
1,1,2-Trichloroethane		0 054	6 0	Chromium (Total)		2 77	0 60 mg/l TCLP[4]
Trichloroethylene		0 054	6 0	Cyanides (Total)		1 2	590
Trichloromonofluoromethane		0 020	30	Cyanides (Amenable)		0 86	30[1]
2,4,5-Trichlorophenol		0.18	7 4	Fluoride		35	NA[4]
2,4,6-Trichlorophenol		0 035	7 4	Lead	A	0 69	0 37 mg/l
2,4,5-Trichlorophenoxyacetic acid/2,4,5-T		0 72	7 9	Lead	A	0 69	0 75 mg/l[4] TCLP
1,2,3-Trichloropropane		0 85	30	Mercury (Nonwastewater from Retort)		NA	0 20 r. TCLP
1,1,2-Trichloro-1,2,2-trifluoroethane		0 057	30	Mercury (All others)		0 15	0 025 mg/l TCLP
Triethylamine		0 081[1]	1 5[1]	Nickel		3 98	5.0 mg/l TCLP
Tris-(2,3-Dibromopropyl)phosphate		0 11	0 10[1]	Nickel		3 98	11 mg/l TCLP[4]
Vernolate		0 042[1]	6 0[1]	Selenium		0 82	0.16 mg/l TCLP
Vinyl chloride		0 27	6 0	Selenium		0 82	5 7 mg/l TCLP[5]
Xylenes – mixed isomers (sum of o-,m-, and p-xylene concentrations)		0 32	30	Silver		0 43	0 30 mg/l TCLP
				Silver		0 43	0 14 mg/l TCLP[4]
				Sulfide		14	NA[2]
				Thallium		1 4	0 078 mg/l TCLP[1]
				Thallium		1 4	0.20 mg/l TCLP[4]
				Vanadium		4 3[1]	1 6 mg/l TCLP[2]
				Zinc		2 61	4 3 mg/l TCLP[2]

[1] These constituents are only applicable as underlying hazardous constituents. These constituents are not constituents that require treatment in D39 wastes.

[2] For an underlying hazardous constituent requiring treatment in a D001-D043 waste.

[3] These compounds are regulated by the sum of their concentration instead of as individual constituents.

[4] These constituents are effective in authorized states or states with no LDR program on 8/24/99. These concentrations are effective in all other states upon adoption by the state.

[5] Effective 8/24/98 in unauthorized states or states with no LDR program. Selenium at 5.7 mg/l is not an underlying hazardous constituent in D001-D043 waste. This becomes effective in authorized states upon adoption by the state.

ATTACHMENT
B

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

Generator Name DOE/ Bechtel Jacobs LLC Manifest Doc. No. 05B03

Profile No. 9307-02 State Manifest No :

1. Is this waste a non-wastewater or wastewater? (See 40 CFR 268.2) Check ONE: Non-wastewater ☑ Wastewater ☐
2. Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory. Spent solvent standards are listed on the following page. If F039, multi-source leachate applies those constituents must be listed and attached by the generator. If D001-D043 requires treatment of the characteristic and meet 268.48 standards, then the underlying hazardous constituent(s) present in the waste must be listed and attached.

SEQ #	3. USEPA HAZARDOUS WASTE CODE(S)	4. SUBCATEGORY (ENTER THE SUBCATEGORY DESCRIPTION. IF NOT APPLICABLE, BE SURE TO CHECK NONE) DESCRIPTION	NONE	5. HOW MUST THE WASTE BE MANAGED? (ENTER ONE BELOW)
1	D008	Radioactive Lead Solids	☐	A
2	D006		☒	A
3	D011		☒	A
4			☐	

dentify F039 or D001-D043 underlying hazardous constituent (s), use the "F039/Underlying Hazardous Constituent Form" provided (Form B1) and check here ☐
) UHCs are present in the waste upon its initial generation check here: ☒
ist additional USEPA waste code(s) and subcategoric(s), use the supplemental sheet provided (Form A2) and check here: ☐

Y MUST THE WASTE BE MANAGED? In column 5 above, enter the letter (A, B1, B3, B4, C, D, or E) below that describes how the waste must be managed to comply with the land osal regulations (40 CFR 268.7). Please understand that if you enter the letter B1, B3, B4, or D, you are making the appropriate certification as provided below. (States authorized by to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed fer to those state citations instead of the 40 CFR citations.

RESTRICTED WASTE REQUIRES TREATMENT
This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.
☒ For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion in units as specified in 268.42 Table 1. I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS
"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 or 268 49, to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

RESTRICTED WASTE SUBJECT TO A VARIANCE
This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 5 above.
☐ For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT
"I certify under penalty of law I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D. I believe that the information I submitted is true, accurate and complete I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS
This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

by certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information

ure Jane Dilatt Title Proj Mgr Date 3/24/05

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

Generator Name DOE/ Bechtel Jacobs LLC Manifest Doc. No. 04110

File No. 9307-08-001 State Manifest No.:

1. Is this waste a non-wastewater or wastewater? (See 40 CFR 268.2) Check ONE: Non-wastewater ☒ Wastewater ☐
2. Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory. Spent solvent standards are listed on the following page. If F039, multi-source leachate applies those constituents must be listed and attached by the generator. If D001-D043 requires treatment of the characteristic and meet 268.48 standards, then the underlying hazardous constituent(s) present in the waste must be listed and attached.

REF	3. USEPA HAZARDOUS WASTE CODE(S)	4. SUBCATEGORY ENTER THE SUBCATEGORY DESCRIPTION IF NOT APPLICABLE SIMPLY CHECK NONE		5. HOW MUST THE WASTE BE MANAGED? ENTER LETTER FROM BELOW
		DESCRIPTION	NONE	
1	P015		☒	C. Correspondence
2			☐	CD040360
3			☐	
4			☐	

Identify F039 or D001-D043 underlying hazardous constituent (s), use the "F039/Underlying Hazardous Constituent Form" provided (Form B1) and check here ☐
UHCs are present in the waste upon its initial generation check here: ☒
st additional USEPA waste code(s) and subcategorie(s), use the supplemental sheet provided (Form A2) and check here: ☐

/ MUST THE WASTE BE MANAGED? In column 5 above, enter the letter (A, B1, B3, B4, C, D, or E) below that describes how the waste must be managed to comply with the land sal regulations (40 CFR 268.7). Please understand that if you enter the letter B1, B3, B4, or D, you are making the appropriate certification as provided below. (States authorized by to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed er to those state citations instead of the 40 CFR citations.

RESTRICTED WASTE REQUIRES TREATMENT

This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.

☐ For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion in units as specified in 268.42 Table 1. I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS

"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 or 268.49, to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

RESTRICTED WASTE SUBJECT TO A VARIANCE

This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 5 above

☐ For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45"

RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT

"I certify under penalty of law I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS

This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

y certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information.

[signature] Title Proj Mgr Date 3/24/05

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

Generator Name DOE/ Bechtel Jacobs LLC Manifest Doc. No. 05B02

Profile No. 9307-02 State Manifest No.:

1. Is this waste a non-wastewater or wastewater? (See 40 CFR 268.2) Check ONE: Non-wastewater ☒ Wastewater ☐
2. Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory. Spent solvent standards are listed on the following page. If F039, multi-source leachate applies those constituents must be listed and attached by the generator. If D001-D043 requires treatment of the characteristic and meet 268.48 standards, then the underlying hazardous constituent(s) present in the waste must be listed and attached.

REF. NO.	1. USEPA HAZARDOUS WASTE CODES	2. SUBCATEGORY (ENTER THE SUBCATEGORY DESCRIPTION IF NOT APPLICABLE, SIMPLY CHECK NONE)		3. HOW MUST THE WASTE BE MANAGED? (ENTER LETTER FROM BELOW)
		DESCRIPTION	NONE	
1	D008	Radioactive Lead Solids	☐	A
2			☐	
3			☐	
4			☐	

Identify F039 or D001-D043 underlying hazardous constituent (s), use the "F039/Underlying Hazardous Constituent Form" provided (Form B1) and check here ☐
o UHCs are present in the waste upon its initial generation check here: ☒
list additional USEPA waste code(s) and subcategorie(s), use the supplemental sheet provided (Form A2) and check here: ☐

W MUST THE WASTE BE MANAGED? In column 5 above, enter the letter (A, B1, B3, B4, C, D, or E) below that describes how the waste must be managed to comply with the land posal regulations (40 CFR 268.7). Please understand that if you enter the letter B1, B3, B4, or D, you are making the appropriate certification as provided below. (States authorized b A to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed efer to those state citations instead of the 40 CFR citations.

RESTRICTED WASTE REQUIRES TREATMENT
This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.
☐ For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion in units as specified in 268.42 Table 1. I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS
"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 or 268.49, to remove the hazardous characteristic This decharacterized waste contains underlying hazardous constituents that require further treatment to meet treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

RESTRICTED WASTE SUBJECT TO A VARIANCE
This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 5 above.
☐ For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT
"I certify under penalty of law I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D. I believe that the information I submitted is true, accurate and complet I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS
This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

reby certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information.

nature [signature] Title Proj Mgr Date 3/24/05

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

Generator Name DOE/BECHTEL JACOBS LLC, Manifest Doc. No. 04105

Profile No. 9307-05-005 State Manifest No.: N/A

1. Is this waste a non-wastewater or wastewater? (See 40 CFR 268.2) Check ONE: Non-wastewater ☒—Wastewater ☐
2. Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory. Spent solvent standards are listed on the following page. If F039, multi-source leachate applies those constituents must be listed and attached by the generator. If D001-D043 requires treatment of the characteristic and meet 268.48 standards, then the underlying hazardous constituent(s) present in the waste must be listed and attached.

PRE-PRINTED USEPA HAZARDOUS WASTE CODES	ENTER THE SUBCATEGORY DESCRIPTION, IF NOT APPLICABLE SIMPLY ENTER NONE		HOW MUST THE WASTE BE MANAGED? ENTER FROM BELOW
	DESCRIPTION	ACK	
1 D002		☒	A
2 D004		☒	A
3		☐	
4		☐	

Identify F039 or D001-D043 underlying hazardous constituent (s), use the "F039/Underlying Hazardous Constituent Form" provided (Form B1) and check here: ☒

UHCs are present in the waste upon its initial generation check here: ☐

List additional USEPA waste code(s) and subcategorie(s), use the supplemental sheet provided (Form A2) and check here: ☐

HOW MUST THE WASTE BE MANAGED? In column 5 above, enter the letter (A, B1, B3, B4, C, D, or E) below that describes how the waste must be managed to comply with the land disposal regulations (40 CFR 268.7). Please understand that if you enter the letter B1, B3, B4, or D, you are making the appropriate certification as provided below. (States authorized to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed to those state citations instead of the 40 CFR citations.

RESTRICTED WASTE REQUIRES TREATMENT

This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.

☐ For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion in units as specified in 268.42 Table 1. I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS

"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 or 268.49, to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

RESTRICTED WASTE SUBJECT TO A VARIANCE

This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 5 above.

☐ For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT

"I certify under penalty of law I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS

This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

I certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information

Signature W. Amy Rowe Title PROJECT ENGINEER Date 3-24-2005

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

Generator Name DOE/ Bechtel Jacobs LLC Manifest Doc. No. 04I04

Profile No. 9307-04-005 State Manifest No.: N/A

1. Is this waste a non-wastewater or wastewater? (See 40 CFR 268.2) Check ONE: Non-wastewater ☑ Wastewater ☐
2. Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory. Spent solvent standards are listed on the following page. If F039, multi-source leachate applies those constituents must be listed and attached by the generator. If D001-D043 requires treatment of the characteristic and meet 268.48 standards, then the underlying hazardous constituent(s) present in the waste must be listed and attached.

REF.	1. USEPA HAZARDOUS WASTE CODE(S)	4. SUBCATEGORY ENTER THE SUBCATEGORY DESCRIPTION. TRACT APPLICABLE SIMPLY COLOR NONE		5. HOW MUST THE WASTE BE MANAGED? ENTER LETTER FROM BELOW
		DESCRIPTION	NONE	
1	D002		☒	A
2	D019		☒	A
3			☐	
4			☐	

identify F039 or D001-D043 underlying hazardous constituent (s), use the "F039/Underlying Hazardous Constituent Form" provided (Form B1) and check here ☑
o UHCs are present in the waste upon its initial generation check here: ☐
list additional USEPA waste code(s) and subcategorie(s), use the supplemental sheet provided (Form A2) and check here: ☐

W MUST THE WASTE BE MANAGED? In column 5 above, enter the letter (A, B1, B3, B4, C, D, or E) below that describes how the waste must be managed to comply with the lanc osal regulations (40 CFR 268.7). Please understand that if you enter the letter B1, B3, B4, or D, you are making the appropriate certification as provided below. (States authorized b A to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below Where these regulatory citations differ, your certification will be d d efer to those state citations instead of the 40 CFR citations.

RESTRICTED WASTE REQUIRES TREATMENT
This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.
☐ For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion in units as specified in 268.42 Table 1. I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS
"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 or 268 49, to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

RESTRICTED WASTE SUBJECT TO A VARIANCE
This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 5 above.
☐ For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT
"I certify under penalty of law I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D. I believe that the information I submitted is true, accurate and complete I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS
This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

eby certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information.

ature W. [signature] Title PROJECT ENGINEER Date 8-24 2005

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

Generator Name DOE/ Bechtel Jacobs LLC Manifest Doc. No. 05B01

Profile No. 9307-02 State Manifest No.:

1. Is this waste a non-wastewater or wastewater? (See 40 CFR 268.2) Check ONE: Non-wastewater ☒ Wastewater ☐
2. Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory. Spent solvent standards are listed on the following page. If F039, multi-source leachate applies those constituents must be listed and attached by the generator. If D001-D043 requires treatment of the characteristic and meet 268.48 standards, then the underlying hazardous constituent(s) present in the waste must be listed and attached.

2. REF. NO.	3. USEPA HAZARDOUS WASTE CODE(S)	4. SUBCATEGORY (ENTER THE SUBCATEGORY DESCRIPTION IF NOT PRESCRIBED; SEE INSTRUCTIONS) DESCRIPTION	NONE	5. HOW MUST THE WASTE BE MANAGED? (ENTER LETTER FROM BELOW)
1	D008	Radioactive Lead Solids	☐	A
2			☐	
3			☐	
4			☐	

Identify F039 or D001-D043 underlying hazardous constituent (s), use the "F039/Underlying Hazardous Constituent Form" provided (Form B1) and check here ☐
No UHCs are present in the waste upon its initial generation check here: ☒
List additional USEPA waste code(s) and subcategorie(s), use the supplemental sheet provided (Form A2) and check here ☐

HOW MUST THE WASTE BE MANAGED? In column 5 above, enter the letter (A, B1, B3, B4, C, D, or E) below that describes how the waste must be managed to comply with the land disposal regulations (40 CFR 268.7). Please understand that if you enter the letter B1, B3, B4, or D, you are making the appropriate certification as provided below. (States authorized by EPA to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed to reference those state citations instead of the 40 CFR citations

RESTRICTED WASTE REQUIRES TREATMENT
This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.
☐ For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion in units as specified in 268.42 Table 1. I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS
"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 or 268.49, to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

RESTRICTED WASTE SUBJECT TO A VARIANCE
This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 5 above
☐ For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT
"I certify under penalty of law I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS
This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions

I hereby certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information.

Name Lee Dilatt Title Proj Mgr Date 3/24/05

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

Generator Name DOE/ Bechtel Jacobs LLC Manifest Doc. No. 05C01

Profile No. 9307-02 State Manifest No.:

1. Is this waste a non-wastewater or wastewater? (See 40 CFR 268.2) Check ONE: Non-wastewater ☒ Wastewater ☐
2. Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory. Spent solvent standards are listed on the following page. If F039, multi-source leachate applies those constituents must be listed and attached by the generator. If D001-D043 requires treatment of the characteristic and meet 268.48 standards, then the underlying hazardous constituent(s) present in the waste must be listed and attached.

(1)	(2) USEPA HAZARDOUS WASTE CODE(S)	(3) SUBCATEGORY (IF APPLICABLE) OR DESCRIPTION (IF NOT APPLICABLE)	(4) NONE	(5) HOW MUST THIS WASTE BE MANAGED? ENTER ONE LETTER (A, B1, B3, B4, C, D, or E)
1	D008	Radioactive Lead Solids	☐	A
2	D006		☒	A
3	D011		☒	A
4	D009	Low Mercury	☐	A

Identify F039 or D001-D043 underlying hazardous constituent (s), use the "F039/Underlying Hazardous Constituent Form" provided (Form B1) and check here ☐
) UHCs are present in the waste upon its initial generation check here: ☒
ist additional USEPA waste code(s) and subcategorie(s), use the supplemental sheet provided (Form A2) and check here: ☐

W MUST THE WASTE BE MANAGED? In column 5 above, enter the letter (A, B1, B3, B4, C, D, or E) below that describes how the waste must be managed to comply with the land osal regulations (40 CFR 268.7). Please understand that if you enter the letter B1, B3, B4, or D, you are making the appropriate certification as provided below. (States authorized b , to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed fer to those state citations instead of the 40 CFR citations.

RESTRICTED WASTE REQUIRES TREATMENT
This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.
☒ For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion in units as specified in 268.42 Table 1. I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS
"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 or 268.49, to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

RESTRICTED WASTE SUBJECT TO A VARIANCE
This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 5 above.
☐ For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT
"I certify under penalty of law I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D. I believe that the information I submitted is true, accurate and complete I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS
This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

eby certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information.

ature Lee D Smith Title Proj Mgr Date 3/24/05

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

Generator Name DOE/ Bechtel Jacobs LLC Manifest Doc. No. 05B03

ıfile No. 9307-07 State Manifest No.:

1. Is this waste a non-wastewater or wastewater? (See 40 CFR 268.2) Check ONE: Non-wastewater ☒ Wastewater ☐
2. Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory. Spent solvent standards are listed on the following page. If F039, multi-source leachate applies those constituents must be listed and attached by the generator. If D001-D043 requires treatment of the characteristic and meet 268.48 standards, then the underlying hazardous constituent(s) present in the waste must be listed and attached.

REF	USEPA HAZARDOUS WASTE CODE(S)	SUBCATEGORY ENTER THE SUBCATEGORY DESCRIPTION IF NOT APPLICABLE, SIMPLY CHECK NONE		HOW MUST THE WASTE BE MANAGED? ENTER LETTER FROM BELOW
		DESCRIPTION	NONE	
1	D008	Radioactive Lead Solids	☐	A
2			☐	
3			☐	
4			☐	

dentify F039 or D001-D043 underlying hazardous constituent (s), use the "F039/Underlying Hazardous Constituent Form" provided (Form B1) and check here ☐
› UHCs are present in the waste upon its initial generation check here: ☒
ıst additional USEPA waste code(s) and subcategorie(s), use the supplemental sheet provided (Form A2) and check here: ☐

V MUST THE WASTE BE MANAGED? In column 5 above, enter the letter (A, B1, B3, B4, C, D, or E) below that describes how the waste must be managed to comply with the land osal regulations (40 CFR 268.7). Please understand that if you enter the letter B1, B3, B4, or D, you are making the appropriate certification as provided below. (States authorized by . to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed fer to those state citations instead of the 40 CFR citations.

RESTRICTED WASTE REQUIRES TREATMENT
This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.
☐ For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion in units as specified in 268.42 Table 1. I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS
"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 or 268.49, to remove the hazardous characteristic This decharacterized waste contains underlying hazardous constituents that require further treatment to meet treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

RESTRICTED WASTE SUBJECT TO A VARIANCE
This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 5 above
☐ For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT
"I certify under penalty of law I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D. I believe that the information I submitted is true, accurate and complete I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS
This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

›by certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information.

ıture [signature] Title Proj Mgr. Date 3/24/05

BECHTEL JACOBS
Bechtel Jacobs Company LLC

DOE Contract No. DE-AC05-03OR22980
Job No. 23900
ESH-05-0008
July 27, 2005

Mr. Walt Francis
Enforcement and Compliance Assurance
Branch Waste
Pesticides and Toxics Division
United States Environmental Protection Agency Region V
77 West Jackson Boulevard, DE-9J
Chicago, Illinois 60604

Dear Mr. Francis:

DE-AC05-03OR22980: Notice of Violation - RCRA Compliance Inspection

On July 12, 2005, the Department of Energy (DOE) and Bechtel Jacobs Company LLC (BJC), received a Notice of Violation (NOV) regarding the March 8 and 9 annual Resource Conservation and Recovery Act (RCRA) inspection completed at the DOE Portsmouth Gaseous Diffusion Plant. The NOV stated the following:

> During the records review of the inspection, the inspectors reviewed a number of the out-bound hazardous waste manifests and enclosed Land Disposal Restrictions (LDR) forms. It appeared that the out-bound hazardous waste manifest LDR forms for those shipments to Envirocare of Utah, Inc. did not have a box to mark either wastewater or non-wastewater. Therefore, U.S. DOE failed to comply with OAC Rule 3745-270-07(A)[40CFR § 268.7] and violated RCRA Hazardous Waste Permit Condition B.36.(j).

On April 7, 2005, BJC submitted a letter (attached) to DOE documenting the corrective actions taken by BJC to address the deficient hazardous waste manifest LDR form issues that had been noted in the RCRA inspection. On April 11, 2005, DOE submitted this information (by attached letter) to US EPA and Ohio EPA to document that corrective actions had been taken to correct the deficient hazardous waste manifest LDR form and to demonstrate the corrected forms had been delivered to Envirocare of Utah. This issue has been abated and the site has returned to compliance. Please provide BJC a letter indicating that the site was returned to compliance prior to the end of BJC's contractual responsibility for this site on June 27, 2005.

If you have any questions or comments, please contact Larry Long at 865-576-2907.

Sincerely,

Michael C. Hughes
President and General Manager

MCH:LWL:crw
Attachments: As stated

c/att: William E. Murphie, DOE
Mike Savage, OEPA/Columbus
Melody Steward, OEPA/Logan
Jean Dunkirk
Patrick Willison
Dennis Stevenson
Larry Long
Lester Hurst
File–EMEF DMC–RC

ATTACHMENTS

Reference: Letter dated April 7, 2005, from John J. Meersman, Manager of Projects, Portsmouth Gaseous Diffusion Plant to William E. Murphie, Manager, Portsmouth/Paducah Project Office

Reference: Letter dated April 11, 2005, from William E. Murphie, Manager, Portsmouth/Paducah Project Office to Walt Francis, Enforcement and Compliance Assurance Branch Waste, Pesticides and Toxics Division, Chicago, Illinois 50504

6490052158

Department of Energy

Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513
(859) 219-4000

APR 12 2005

APR 11 2005

Mr. Walt Francis
Enforcement and Compliance Assurance Branch Waste
Pesticides and Toxics Division
United States Environmental Protection Agency Region V
77 West Jackson Boulevard, DE-9J
Chicago, Illinois 60604

PPPO-3-324-05

Dear Mr. Francis:

PORTSMOUTH GASEOUS DIFFUSION PLANT (PORTS) RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) INSPECTION - LAND DISPOSAL RESTRICTION NOTIFICATION FORM

On March 8-9, 2005, the United States and Ohio Environmental Protection Agencies conducted a RCRA inspection of the Department of Energy (DOE) PORTS site. During this inspection, the agencies identified a deficient Land Disposal Restriction (LDR) notification form that was being used. This discovery indicated that LDR notification forms for waste shipments to Envirocare of Utah, Inc. did not identify waste meeting the definition of wastewater or non-wastewater as required by OAC 3745-270-07(A)(4).

The DOE Management & Integration Contractor, Bechtel Jacobs Company LLC (BJC), notified their subcontractor, Wastren, Inc. (WASTREN) who immediately acted to inform the Treatment Storage Disposal Facility (TSDF) that the LDR notification form in use was inadequate to meet generator paperwork requirements. An updated LDR form was provided by the TSDF to WASTREN on March 9, 2005.

WASTREN reviewed all forms identified by the agencies as deficient during the inspection. These forms were corrected, and hand-delivered by March 24, 2005, to an Envirocare of Utah, Inc. onsite representative, who provided them to the disposal facility on March 28, 2005. Enclosed are the updated LDR forms provided by the TSDF on March 9, 2005 (Attachment A) and the corrected forms hand-delivered to the Envirocare of Utah, Inc. representative (Attachment B).

The DOE will require BJC to review the new WASTREN forms as part of the shipping documentation review process. As an additional corrective action, WASTREN will now include LDR forms with transportation packages provided for BJC review. WASTREN will maintain the policy of providing LDR forms with each shipment.

If you have any questions, please contact Melda Rafferty of my staff (740) 897-5521.

Sincerely,

Melda J. Rafferty for

William E. Murphie
Manager
Portsmouth/Paducah Project Office

Enclosures

cc w/enclosures:
M. Stewart, OEPA/LOGAN
M. Savage, OEPA/COLUMBUS
J. Meersman, BJC/PORTS
Administrative Records

cc w/o enclosures:
R. Blumenfeld, PPPO/LEX

Lew Gaidell
Dandy Childers
Rosemary Richmond
Patrick Willison

ATTACHMENT
A

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

Generator Name _____ Manifest Doc. No _____

Profile No _____ State Manifest No.. _____

1. Is this waste a non-wastewater or wastewater? (See 40 CFR 268.2) Check ONE Non-wastewater ☐ Wastewater ☐
2. Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory Spent solvent standards are listed on the following page. If F039, multi-source leachate applies those constituents must be listed and attached by the generator. If D001-D043 requires treatment of the characteristic and meet 268.48 standards, then the underlyi hazardous constituent(s) present in the waste must be listed and attached.

LINE #	1. USEPA HAZARDOUS WASTE NUMBER	2. SUBCATEGORY ENTER THE SUBCATEGORY DESCRIPTION IF YOU APPLY A SUBCATEGORY DESCRIPTION	NONE	3. HOW WILL THE WASTE BE MANAGED? ENTER THE APPROPRIATE LETTER
1			☐	
2			☐	
3			☐	
4			☐	

identify F039 or D001-D043 underlying hazardous constituent (s), use the "F039/Underlying Hazardous Constituent Form" provided (Form B1) and check here ☐
lo UHCs are present in the waste upon its initial generation check here ☐
list additional USEPA waste code(s) and subcategorie(s), use the supplemental sheet provided (Form A2) and check here: ☐

W MUST THE WASTE BE MANAGED? In column 5 above, enter the letter (A, B1, B3, B4, C, D, or E) below that describes how the waste must be managed to comply with the lan posal regulations (40 CFR 268.7) Please understand that if you enter the letter B1, B3, B4, or D, you are making the appropriate certification as provided below. (States authorized A to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deeme efer to those state citations instead of the 40 CFR citations

Or ✗ **RESTRICTED WASTE REQUIRES TREATMENT**
This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40
☐ For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268 45 "
RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment "
GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification Based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion in units as specified in 268 42 Table 1. I have been unable to detect the nonwastewater organic constituents despite having used best good fait efforts to analyze for such constituents I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."
DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS
"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268 40 or 268 49, to remove the hazardous characteristic Thi decharacterized waste contains underlying hazardous constituents that require further treatment to meet treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment "
RESTRICTED WASTE SUBJECT TO A VARIANCE
This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension Enter the effective date of prohibition in column 5 above
☐ For hazardous debris "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268 45 "
RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT
"I certify under penalty of law I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D I believe that the information I submitted is true, accurate and complet I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment "
WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS
This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

reby certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information

ature_____ Title_____ Date_____

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM (PHASE IV) – REVERSE SIDE

ıe waste identified on the first page of this form is described by any of the following USEPA hazardous waste codes. F001, F002, F003, F004, F005, and all solvent constituents will be monitored by the treater, then each constituent MUST be identified below by checking the appropriate box, and this page must accompany the shipment, along with the previous ge of this form. If the waste code F039 describes this waste, then the corresponding list of constituents must be attached. If D001-D043 require treatment to 268 48 standards, then t derlying hazardous constituent(s) must also be attached.

etone (F003)	0.28	160	Methanol (F003)	5.6	0.75 (TCLP)
nzene (F005)	0.14	10	Methylene chloride (F001, F002)	0 089	30
butanol (n-butyl alcohol) (F003)	5.6	2.6	Methyl ethyl ketone (F005)	0 28	36
rbon disulfide (F005)	3 8	4 8 (TCLP)	Methyl isobutyl ketone (F003)	0.14	33
rbon tetrachlonde (F001)	0.057	6 0	Nitrobenzene (F004)	0.068	14
lorobenzene (F002)	0 057	6 0	2-Nitropropane (F005)	INCIN or ((WETOX or C HOXD) followed by CARBN)	INCIN
Cresol (F004)	0.11	5 6	Pyridine (F005)	0 014	16
esol (m- and p- isomers) (F004)	0 77	5 6	Tetrachloroethylene (F001, F002)	0 056	6 0
clohexanone (F003)	0 36	0 75 (TCLP)	Toluene (F005)	0 080	10
Dichlorobenzene (F002)	0.088	6 0	1,1,1-Trichloroethane (F001, F002)	0 054	6 0
Ethoxyethanol (F005) also called ylene glycol, monoethyl ether	INCIN or BIODG	INCIN	1,1,2-Trichloroethane (F002)	0 054	6 0
yl acetate (F003)	0 34	33	Trichloroethylene (F001, F002)	0.054	6 0
yl benzene (F003)	0 057	10	Trichloromonofluoromethane (F002)	0 020	30
yl ether (F003)	0 12	160	1,1,2-Trichloro-1,2,2-trifluoroethane (F002)	0 057	30
ob. l (Isobutyl Alcohol) (F005)	5 6	170	Xylenes (sum of o-, m-, and p-isomers) (F003)	0 32	30

ll spent solvent treatment standards are measured through a total waste analysis (TCA), unless otherwise noted. Wastewater units are mg/l, nonwastewater are mg/kg.

or contaminated soils using the alternative soil treatment standards, the treatment standards for F001-F005 spent solvents must be a 90% reduction of the constituents or less than 1 e standard listed.

SUBCATEGORY REFERENCE

)01

Ignitable characteristic wastes, except for the 40 CFR 261.21(a) (1) High TOC subcategory, that are managed in non-CWA/non-CWA equivalent/non-Class I SDWA systems

Ignitable characteristic wastes, except for the 40 CFR 261 21(a) (1) High TOC subcategory, that are managed in CWA/CWA-equivalent or Class I SDWA systems.

High TOC Ignitable characteristic liquids subcategory based on 40 CFR 261 21(a) (1) – Greater than or equal to 10% total organic carbon.

D002

Corrosive characteristic wastes that are managed in non-CWA/non-CWA-equivalent/non-Class I SDWA systems.

Corrosive characteristic wastes that are managed in CWA, CWA-equivalent, or Class I SWDA systems

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM (PHASE IV)

Generator Name _____ Manifest Doc. No _____

Profile No. _____ State Manifest No. _____

This form is a continuation from form A1 for a waste identified by more than five USEPA waste code/subcategory groups. This page by itself IS NOT an acceptable Land Disposal Notification and Certification Form.

Continue (from form A1, Page 1) to identify ALL USEPA hazardous wastes that apply to this waste shipment (as defined by 40 CFR 261). For each waste number, identify the corresponding subcategory (write in the description from 40 CFR 268.40, or check NONE if the waste does not have a subcategory.). Also identify in column 5 how the waste must be managed. Spent solvents are listed Form A1, Page 2. F039 constituent(s) and underlying hazardous constituent(s) if applicable, must be listed and attached.

5			☐	
6			☐	
7			☐	
8			☐	
9			☐	
10			☐	
11			☐	
12			☐	
13			☐	
14			☐	
15			☐	
16			☐	
17			☐	
18			☐	
19			☐	
20			☐	
21			☐	
22			☐	
23			☐	
24			☐	
25			☐	
26			☐	
27			☐	
28			☐	
29			☐	
30			☐	
31			☐	
32			☐	
33			☐	
34			☐	
35			☐	

identify F039 or D001-D043 underlying hazardous constituent(s), use the "F039/Underlying Hazardous Constituent Form: ☐

no UHCs are present in the waste upon its initial generation check here ☐

hereby certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information.

Signature _____

Title _____ Date _____

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM (PHASE IV)

Generator Name _____ Manifest Doc No. _____

Profile No. _____ State Manifest No : _____

This form is a continuation from form A1 for a waste identified by more than five USEPA waste code/subcategory groups. This page by itself IS NOT an acceptable Land osal Notification and Certification Form

ntinue (from form A1, Page 1) to identify ALL USEPA hazardous wastes that apply to this waste shipment (as defined by 40 CFR 261). For each waste number, identify the corresponding subcategory (write in the description from 40 CFR 268 40, or check NONE if the waste does not have a subcategory) Also identify in column 5 how the waste must be managed. Spent solvents are listed Form A1, Page 2. F039 constituent(s) and underlying hazardous constituent(s) if applicable, must be listed and attached.

		DESCRIPTION	NONE	
36			☐	
37			☐	
38			☐	
39			☐	
40			☐	
41			☐	
42			☐	
43			☐	
44			☐	
45			☐	
46			☐	
47			☐	
48			☐	
49			☐	
50			☐	
51			☐	
52			☐	
53			☐	
54			☐	
55			☐	
56			☐	
57			☐	
58			☐	
59			☐	
60			☐	
61			☐	
62			☐	
63			☐	
64			☐	
65			☐	
66			☐	

identify F039 or D001-D043 underlying hazardous constituent(s), use the "F039/Underlying Hazardous Constituent Form" ☐

no UHCs are present in the waste upon its initial generation check here: ☐

I hereby certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information

Signature _____

Date _____

F039/UNDERLYING HAZARDOUS CONSTITUENT FORM (UTS)
(Phase IV)

Generator Name: _____ **Manifest Doc. Number:** _____

Profile Number: _____ **State Manifest No.:** _____

If D001-D043 requires treatment to the 40 CRF 268 48 standards, then each underlying hazardous constituent (UHC) present in the waste at the point generation and at a level above the Universal Treatment Standard (UTS) constituent specific standard must be listed Write the letter (A, B1, B3, or C th corresponds to the letter on the land disposal form A1) beside each constituent present to properly describe how the constituent(s) must be managed under 4(CFR 268 7 If contaminated soil requires treatment to 40 CFR 268 49 standards, then each UHC in the waste at the point of generation and at a level above 1 times the UTS must be listed Write the appropriate letter which corresponds to the letter on the LDR form

CONSTITUENT	HOW MUST THIS CONSTITUENT BE MANAGED?	WW (mg/l)	NWW (mg/kg) unless noted	CONSTITUENT	HOW MUST THIS CONSTITUENT BE MANAGED?	WW (mg/l)	NWW (mg/kg) unless noted
Acenaphthylene		0 059	3 4	2-Chloro-1,3-butadiene		0 057	0 28[1]
Acenapthene		0 059	3 4	Chlorodibromomethane		0 057	15
Acetone		0 28	160	Chloroethane		0 27	6 0
Acetonitrile		5 6	38[1]	bis(2-Chloroethoxy)methane		0 036	7 2
Acetophenone		0 010	9 7	bis(2-Chloroethyl)ether		0 033	6 0
2-Acetylaminofluorene		0 059	140	Chloroform		0 046	6 0
Acrolein		0 29	NA	bis(2-Chloroisopropyl)ether		0 055	7 2
Acylamide		19[1]	23[1]	p-Chloro-m-cresol		0 018	14
Acrylonitrile		0 24	84	2-Chloroethyl vinyl ether		0 062[1]	NA[1]
Aldicarb sulfone		0 056[1]	0 28[1]	Chloromethane/Methyl chloride		0 19	30
Aldrin		0 021	0 066	2-Chloronaphthalene		0 055	5 6
4-Aminobiphenyl		0 13	NA	2-Chlorophenol		0 044	5 7
Aniline		0 81	14	3-Chloropropylene		0.036	30
Anthracene		0 059	3 4	Chrysene		0 059	3 4
Aramite		0 36	NA	o-Cresol		0 11	5 6
alpha-(BHC)		0 00014	0 066	m-Cresol		0 77	5 6
beta-(BHC)		0 00014	0 066	p-Cresol		0 77	5 6
delta-(BHC)		0 023	0 066	m-Cumenyl methylcarbamate		0 056[1]	1 4[1]
gamma-(BHC)		0 0017	0 066	Cyclohexanone		0 36	0 75 mg/l[1]
Barban		0 056[1]	1 4[1]	o,p'-DDD		0 023	0 087
Bendiocarb		0 056[1]	1 4[1]	p,p'-DDD		0 023	0 087
Benomyl		0 056[1]	1 4[1]	o,p'-DDE		0 031	0 087
Benzene		0 14	10	p,p'-DDE		0 031	0 087
Benz(a)anthracene		0 059	3 4	o,p'-DDT		0 0039	0 087
Benzal chloride		0 055[1]	6 0[1]	p,p'-DDT		0 0039	0 087
Benzo(b)fluoranthene[3]		0 11	6 8	Dibenz(a,h)anthracene		0 055	8 2
Benzo(k)fluoranthene[3]		0 11	6 8	Dibenz(a,e)pyrene		0 061	NA
Benzo (g,h,i)perylene		0 0055	1 8	1,2-Dibromo-3-chloropropane		0 11	15
Benzo(a)pyrene		0 061	3 4	1,2-Dibromomethane/ Ethylene dibromide		0 028	15
Bromodichloromethane		0 35	15	Dibromomethane		0 11	15
Bromomethane/Methyl Bromide		0 11	15	m-Dichlorobenzene		0 036	6 0
4-Bromophenyl phenyl ether		0 055	15	o-Dichlorobenzene		0 088	6 0
n-Butyl alcohol		5 6	2 6	p-Dichlorobenzene		0 090	6 0
Butylate		0 042[1]	1 4[1]	Dichlorodifluoromethane		0 23	7 2
Butyl benzyl phthalate		0 017	28	1,1-Dichloroethane		0 059	6 0
2-sec-Butyl-4 6-dinitrophenol/Dinoseb		0.066	2 5	1,2-Dichloroethane		0 21	6 0
Carbaryl		0.006[1]	0 14[1]	1,1-Dichloroethylene		0 025	6 0
Carbenzadim		0 056[1]	1 4[1]	trans-1,2-Dichloroethylene		0 054	30
Carbofuran		0 006[1]	0 14[1]	2,4-Dichlorophenol		0 044	14
Carbofuran phenol		0 056[1]	1 4[1]	2 6-Dichlorophenol		0 044	1 1
Carbon disulfide		3 8	4 8 mg/l TCLP[1]	2,4-Dichlorophenoxyacetic acid/2,4-D		0 72	10
Carbon tetrachloride		0 057	6 0	1,2-Dichloropropane		0 85	18
Carbosulfan		0 028[1]	1 4[1]	cis-1,3-Dichloropropylene		0 036	18
Chlordane (alpha and gamma isomers)		0 0033	0 26	trans-1,3-Dichloropropylene		0 036	18
p-Chloroaniline		0 46	16	Dieldrin		0 017	1 1
[illegible]		0 057	6 0	Diethyl phthalate		0 20	2
[illegible]		0 10	NA	p-Dimethylaminoazobenzene		0 13	

CONSTITUENT	HOW MUST THIS CONSTITUENT BE MANAGED?	WW (mg/l)	NWW (mg/kg) unless noted	CONSTITUENT	HOW MUST THIS CONSTITUENT BE MANAGED?	WW (mg/l)	NWW (mg/kg) unless noted
)imethyl phenol		0 036	14	Methylene chloride		0 089	30
ethyl phthalate		0 047	28	Methyl ethyl ketone		0 28	36
Di-n-butyl phthalate		0 057	28	Methyl isobutyl ketone		0 14	33
1,4-Dinitrobenzene		0 32	2 3	Methyl methacrylate		0 14	160
4,6-Dinitro-o-cresol		0 28	160	Methyl methansulfonate		0 018	NA
2,4-Dinitrophenol		0 12	160	Methyl parathion		0 014	4 6
2,4-Dinitrotoluene		0 32	140	Metolcarb		0 056[1]	1 4[1]
2,6-Dinitrotoluene		0 55	28	Mexacarbate		0 056[1]	1 4[1]
Di-n-octyl phthalate		0 017	28	Molinate		0 042[1]	1 4[1]
Di-n-propylnitrosamine		0 40	14	Naphthalene		0 059	5 6
1,4-Dioxane		12 0	170	2-Naphthylamine		0 52	NA
Diphenylamine[3]		0 92	13[1]	o-Nitroaniline		0 27[1]	14[1]
Diphenylnitrosamine[3]		0 92	13[1]	p-Nitroaniline		0 028	28
1,2-Diphenylhydrazine		0 087	NA	Nitrobenzene		0 068	14
Disulfoton		0 017	6 2	5-Nitro-o-toluidine		0 32	28
Dithiocarbamates (total)		0 028	28[1]	o-Nitrophenol		0 028[1]	13[1]
Endosulfan I		0 023	0 066	p-Nitrophenol		0 12	29
Endosulfan II		0 029	0 13	N-Nitrosodiethylamine		0 40	28
Endosulfan sulfate		0 029	0 13	N-Nitrosodimethylamine		0 40	2 3[1]
Endrin		0 0028	0 13	N-Nitroso-di-n-butylamine		0 40	17
Endrin aldehyde		0 025	0 13	N-Nitrosomethylethylamine		0 40	2 3
EPTC		0 042[1]	1 4[1]	N-Nitrosomorpholine		0 40	2 3
Ethyl acetate		0 34	33	N-Nitrosopiperidine		0 013	35
Ethyl benzene		0 057	10	N-Nitrosopyrrolidine		0 013	35
Ethyl cyanide/Propanenitrile		0 24	360	Oxamyl		0 056[1]	0 28[1]
Ethyl ether		0 12	160	Parathion		0 014	4 6
Bis(2-Ethylhexyl)phthalate		0 28	28	Total PCBs (sum of all PCB isomers or all Aroclors)		0 10	10
Ethyl methacrylate		0 14	160	Pebulate		0 042[1]	1 4[1]
Ethylene oxide		0 12	NA	Pentachlorobenzene		0 055[1]	10[1]
Famphur		0 017	15	PeCDDs (All Pentachlorodibenzo-p-dioxins)		0 000035	0 001
anthene		0 068	3 4	PeCDFs(All Pentachlorodibenzofurans)		0 000035	0 001
Fluorene		0 059	3 4	Pentachloroethane		0 055	6 0
Formetanate hydrochloride		0 056[1]	1 4[1]	Pentachloronitrobenzene		0 055	4 8
Heptachlor		0 0012	0 066	Pentachlorophenol		0 089	7 4
Heptachlor epoxide		0 016	0 066	Phenacetin		0 081	16
Hexachlorobenzene		0 055	10	Phenanthrene		0 059	5 6
Hexachlorobutadiene		0 055	5 6	Phenol		0 039	6 2
Hexachlorocyclopentadiene		0 057	2 4	Phorate		0 021	4 6
HxCDDs (All Hexachrorodibenzo-p-dioxins)		0 000063	0 001	Phthalic acid		0 055[1]	28[1]
HxCDFs (All Hexachlorodibenzofurans)		0 000063	0 001	Phthalic anhydride		0 055	28[1]
Hexachloroethane		0 055	30	Physostigmine		0 056[1]	1 4[1]
Hexachloropropylene		0 035	30	Physostigmine salicylate		0 056[1]	1 4[1]
Indeno(1,2,3 c,d)pyrene		0 0055	3 4	Promecarb		0 056[1]	1 4[1]
Iodomethane		0 19	65	Pronamide		0 093	1 5
Isobutyl alcohol		5 6	170	Propham		0 056[1]	1 4[1]
Isodrin		0 021	0 066	Propoxur		0 056[1]	1 4[1]
Isosafrole		0 081	2 6	Prosulfocarb		0 042[1]	1 4
Kepone		0 0011	0 13	Pyrene		0 067	8 2
Methacrylonitrile		0 24	84	Pyridine		0 014	16
Methanol		5 6	0 75 mg/l[1]	Safrole		0 081	22
[illegible]		0 081	1 5	Silvex/2,4,5-TP		0 72	7 9
[illegible]		0 056[1]	1 4[1]	1,2,4,5-Tetrachlorobenzene		0 055	11
[illegible]		0 026[1]	0 14[1]	TCDDs (All Tetrachlorodibenzo-p-dioxins)		0 000063	0 001
[illegible]		0 [illegible]	0 13	TCDFs (All Tetrachlorodibenzofurans)		[illegible]	[illegible]
[illegible]		[illegible]	[illegible]	1,1,1,2-Tetrachloroethane		[illegible]	[illegible]
[illegible] 2-		0 [illegible]	30	1,1,2,2-Tetrachloroethane		[illegible]	[illegible]

CONSTITUENT	HOW MUST THIS CONSTITUENT BE MANAGED?	WW (mg/l)	NWW (mg/kg) unless noted	CONSTITUENT	HOW MUST THIS CONSTITUENT BE MANAGED?	WW (mg/l)	NWW (mg/kg) unless noted
Tetrachloroethylene		0 056	6 0	INORGANIC CONSTITUENTS			
2,3,4,6-Tetrachlorophenol		0 030	7 4	Antimony		1 9	2 1 mg/l TCLP
Thiodicarb		0 019[1]	1 4[1]	Antimony		1 9	1 15 mg/l TCLP[4]
Thiophanate-methyl		0 056[1]	1 4[1]	Arsenic		1 4	5 0 mg/l TCLP
Toluene		0 080	10	Barium		1 2	7 6 mg/l TCLP
Toxaphene		0 0095	2 6	Barium		1 2	21 mg/l TCLP[4]
Triallate		0 042[1]	1 4[1]	Beryllium		0 82	0 014 mg/l TCLP
Tribromomethane/Bromoform		0 63	15	Beryllium		0 82	1 22 mg/l TCLP[4]
2,4,6-Tribromophenol		0.035	7 4	Cadmium		0 69	0 19 mg/l TCLP
1,2,4-Trichlorobenzene		0 055	19	Cadmium		0 69	0 11 mg/l TCLP[4]
1,1,1-Trichloroethane		0 054	6 0	Chromium (Total)		2 77	0 86mg/l TCLP
1,1,2-Trichloroethane		0 054	6 0	Chromium (Total)		2 77	0 60 mg/l TCLP[4]
Trichloroethylene		0 054	6 0	Cyanides (Total)		1 2	590
Trichloromonofluoromethane		0 020	30	Cyanides (Amenable)		0 86	30[1]
2,4,5-Trichlorophenol		0.18	7 4	Fluoride		35	NA[4]
2,4,6-Trichlorophenol		0 035	7 4	Lead	A	0 69	0 37 mg/l
2,4,5-Trichlorophenoxyacetic acid/2,4,5-T		0 72	7 9	Lead	A	0 69	0 75 mg/l[4] TCLP
1,2,3-Trichloropropane		0 85	30	Mercury (Nonwastewater from Retort)		NA	0 20 r TCLP
1,1,2-Trichloro-1,2,2-trifluoroethane		0 057	30	Mercury (All others)		0 15	0 025 mg/l TCLP
Triethylamine		0 081[1]	1 5[1]	Nickel		3 98	5 0 mg/l TCLP
Tris-(2,3-Dibromopropyl)phosphate		0 11	0 10[1]	Nickel		3 98	11 mg/l TCLP[4]
Vernolate		0 042[1]	6 0[1]	Selenium		0 82	0 16 mg/l TCLP
Vinyl chloride		0 27	6 0	Selenium		0 82	5 7 mg/l TCLP[5]
Xylenes – mixed isomers (sum of o-,m-, and p-xylene concentrations)		0 32	30	Silver		0 43	0 30 mg/l TCLP
				Silver		0 43	0 14 mg/l TCLP[4]
				Sulfide		14	NA[2]
				Thallium		1 4	0 078 mg/l TCLP[1]
				Thallium		1 4	0 20 mg/l TCLP[4]
				Vanadium		4 3	1 6 mg/l TCLP[2]
				Zinc		2 61	4 3 mg/l TCLP[2]

[1] These constituents are only applicable as underlying hazardous constituents These constituents are not constituents that require treatment in 0139 wastes

[2] Not an underlying hazardous constituent requiring treatment in a D001-D043 waste

[3] These compounds are regulated by the sum of their concentration instead of as individual constituents

[4] These constituents are effective in authorized states or states with no LDR program on 8/24/99 These concentrations are effective in all other states upon adoption by the state

[5] Effective 8/24/98 in unauthorized states or states with no LDR program Selenium at 5 7 mg/l is not an underlying hazardous constituent in D001-D043 waste This becomes effective in authorized states upon adoption by the state

ATTACHMENT B

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

Generator Name DOE/ Bechtel Jacobs LLC Manifest Doc. No. 05B03

Profile No. 9307-02 State Manifest No.:

1. Is this waste a non-wastewater or wastewater? (See 40 CFR 268.2) Check ONE: Non-wastewater ☑ Wastewater ☐
2. Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory. Spent solvent standards are listed on the following page. If F039, multi-source leachate applies those constituents must be listed and attached by the generator. If D001-D043 requires treatment of the characteristic and meet 268.48 standards, then the underlying hazardous constituent(s) present in the waste must be listed and attached.

(A)	(B) USEPA HAZARDOUS WASTE CODE #'S	(C) SUBCATEGORY ENTER THE SUBCATEGORY DESCRIPTION, IF NOT APPLICABLE, SIMPLY CHECK (C)(1) DESCRIPTION	(C)(1) NONE	(D) HOW MUST THE WASTE BE MANAGED? (ENTER (A) OR (B) OR (C) OR (D) OR (E))
1	D008	Radioactive Lead Solids	☐	A
2	D006		☑	A
3	D011		☑	A
4			☐	

Identify F039 or D001-D043 underlying hazardous constituent (s), use the "F039/Underlying Hazardous Constituent Form" provided (Form B1) and check here ☐
UHCs are present in the waste upon its initial generation check here: ☒
List additional USEPA waste code(s) and subcategorie(s), use the supplemental sheet provided (Form A2) and check here: ☐

W MUST THE WASTE BE MANAGED? In column 5 above, enter the letter (A, B1, B3, B4, C, D, or E) below that describes how the waste must be managed to comply with the land osal regulations (40 CFR 268.7). Please understand that if you enter the letter B1, B3, B4, or D, you are making the appropriate certification as provided below. (States authorized by to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed fer to those state citations instead of the 40 CFR citations.

RESTRICTED WASTE REQUIRES TREATMENT
This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.
☒ For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion in units as specified in 268.42 Table 1. I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS
"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 or 268.49, to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet treatment standards I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

RESTRICTED WASTE SUBJECT TO A VARIANCE
This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 5 above.
☐ For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT
"I certify under penalty of law I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D. I believe that the information I submitted is true, accurate and complete I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS
This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions

by certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information.

ure Jane Dilatt Title Proj Mgr Date 3/24/05

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

Generator Name DOE/ Bechtel Jacobs LLC Manifest Doc. No. 04110

File No. 9307-08-001 State Manifest No.:

1. Is this waste a non-wastewater or wastewater? (See 40 CFR 268.2) Check ONE: Non-wastewater ☒ Wastewater ☐
2. Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory. Spent solvent standards are listed on the following page. If F039, multi-source leachate applies those constituents must be listed and attached by the generator. If D001-D043 requires treatment of the characteristic and meet 268.48 standards, then the underlying hazardous constituent(s) present in the waste must be listed and attached.

REF. #	2. USEPA HAZARDOUS WASTE CODE(S)	4. SUBCATEGORY ENTER THE SUBCATEGORY DESCRIPTION (IF NOT APPLICABLE SIMPLY CHECK NONE) DESCRIPTION	NONE	5. HOW IS THE WASTE TO BE MANAGED? ENTER LETTER FROM BELOW
1	P015		☒	C. Correspondence CD040360
2			☐	
3			☐	
4			☐	

Identify F039 or D001-D043 underlying hazardous constituent (s), use the "F039/Underlying Hazardous Constituent Form" provided (Form B1) and check here ☐
UHCs are present in the waste upon its initial generation check here: ☒
List additional USEPA waste code(s) and subcategorie(s), use the supplemental sheet provided (Form A2) and check here: ☐

HOW MUST THE WASTE BE MANAGED? In column 5 above, enter the letter (A, B1, B3, B4, C, D, or E) below that describes how the waste must be managed to comply with the land disposal regulations (40 CFR 268.7). Please understand that if you enter the letter B1, B3, B4, or D, you are making the appropriate certification as provided below. (States authorized by to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed er to those state citations instead of the 40 CFR citations.

RESTRICTED WASTE REQUIRES TREATMENT
This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.
☐ For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion in units as specified in 268.42 Table 1. I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS
"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 or 268 49, to remove the hazardous characteristic This decharacterized waste contains underlying hazardous constituents that require further treatment to meet treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

RESTRICTED WASTE SUBJECT TO A VARIANCE
This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 5 above
☐ For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT
"I certify under penalty of law I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS
This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

I certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information.

Name [signature] Title Proj Mgr Date 3/24/05

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

Generator Name DOE/ Bechtel Jacobs LLC Manifest Doc. No. 05B02

Profile No. 9307-02 State Manifest No.:

1. Is this waste a non-wastewater or wastewater? (See 40 CFR 268.2) Check ONE: Non-wastewater ☒ Wastewater ☐
2. Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory. Spent solvent standards are listed on the following page. If F039, multi-source leachate applies those constituents must be listed and attached by the generator. If D001-D043 requires treatment of the characteristic and meet 268.48 standards, then the underlying hazardous constituent(s) present in the waste must be listed and attached.

REF. #	1. USEPA HAZARDOUS WASTE CODE(S)	2. SUBCATEGORY (ENTER THE SUBCATEGORY DESCRIPTION IF NOT APPLICABLE, SIMPLY CHECK NONE)		3. HOW MUST THIS WASTE BE MANAGED? ENTER LETTER FROM BELOW
		DESCRIPTION	NONE	
1	D008	Radioactive Lead Solids	☐	A
2			☐	
3			☐	
4			☐	

Identify F039 or D001-D043 underlying hazardous constituent (s), use the "F039/Underlying Hazardous Constituent Form" provided (Form B1) and check here ☐
o UHCs are present in the waste upon its initial generation check here: ☒
list additional USEPA waste code(s) and subcategorie(s), use the supplemental sheet provided (Form A2) and check here: ☐

W MUST THE WASTE BE MANAGED? In column 5 above, enter the letter (A, B1, B3, B4, C, D, or E) below that describes how the waste must be managed to comply with the land osal regulations (40 CFR 268.7). Please understand that if you enter the letter B1, B3, B4, or D, you are making the appropriate certification as provided below. (States authorized b A to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed efer to those state citations instead of the 40 CFR citations.

RESTRICTED WASTE REQUIRES TREATMENT
This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.
☐ For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion in units as specified in 268.42 Table 1. I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS
"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 or 268.49, to remove the hazardous characteristic This decharacterized waste contains underlying hazardous constituents that require further treatment to meet treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

RESTRICTED WASTE SUBJECT TO A VARIANCE
This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 5 above
☐ For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT
"I certify under penalty of law I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D. I believe that the information I submitted is true, accurate and complet I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS
This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

reby certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information.

nature [signature] Title Proj Mgr Date 3/24/05

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

Generator Name: DOE / BECHTEL JACOBS LLC, Manifest Doc. No.: 04105

Profile No.: 9307-05-005 State Manifest No.: N/A

1. Is this waste a non-wastewater or wastewater? (See 40 CFR 268.2) Check ONE: Non-wastewater ☒ Wastewater ☐
2. Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory. Spent solvent standards are listed on the following page. If F039, multi-source leachate applies those constituents must be listed and attached by the generator. If D001-D043 requires treatment of the characteristic and meet 268.48 standards, then the underlying hazardous constituent(s) present in the waste must be listed and attached.

LINE #	1. USEPA HAZARDOUS WASTE NUMBER	2. SUBCATEGORY (ENTER THE SUBCATEGORY DESCRIPTION IF NOT APPLICABLE SHE) CHECK NONE		3. HOW IS THE WASTE BEING MANAGED? ENTER PROPER CODE
		DESCRIPTION	CODE	
1	D002		☒	A
2	D004		☒	A
3			☐	
4			☐	

Identify F039 or D001-D043 underlying hazardous constituent (s), use the "F039/Underlying Hazardous Constituent Form" provided (Form B1) and check here: ☐
If UHCs are present in the waste upon its initial generation check here: ☐
List additional USEPA waste code(s) and subcategorie(s), use the supplemental sheet provided (Form A2) and check here: ☐

HOW MUST THE WASTE BE MANAGED? In column 5 above, enter the letter (A, B1, B3, B4, C, D, or E) below that describes how the waste must be managed to comply with the land disposal regulations (40 CFR 268.7). Please understand that if you enter the letter B1, B3, B4, or D, you are making the appropriate certification as provided below. (States authorized to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed to reference those state citations instead of the 40 CFR citations.

RESTRICTED WASTE REQUIRES TREATMENT
This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.
☐ For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion in units as specified in 268.42 Table 1. I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS
"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 or 268.49, to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

RESTRICTED WASTE SUBJECT TO A VARIANCE
This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 5 above.
☐ For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT
"I certify under penalty of law I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS
This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

I hereby certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information.

Signature W. Ray Hamm Title PROJECT ENGINEER Date 3-24-2005

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

Generator Name DOE/ Bechtel Jacobs LLC Manifest Doc. No. 04I04

Profile No. 9307-04-005 State Manifest No.: N/A

1. Is this waste a non-wastewater or wastewater? (See 40 CFR 268.2) Check ONE: Non-wastewater ☑ Wastewater ☐
2. Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory. Spent solvent standards are listed on the following page. If F039, multi-source leachate applies those constituents must be listed and attached by the generator. If D001-D043 requires treatment of the characteristic and meet 268.48 standards, then the underlying hazardous constituent(s) present in the waste must be listed and attached.

(1)	(2) USEPA HAZARDOUS WASTE CODE(S)	(3) ENTER THE SUBCATEGORY DESCRIPTION IF NOT APPLICABLE SIMPLY ENTER NONE DESCRIPTION	(4) NONE	(5) HOW MUST THIS WASTE BE MANAGED? ENTER THE APPROPRIATE LETTER
1	D002		☒	A
2	D019		☒	A
3			☐	
4			☐	

Identify F039 or D001-D043 underlying hazardous constituent (s), use the "F039/Underlying Hazardous Constituent Form" provided (Form B1) and check here: ☑
o UHCs are present in the waste upon its initial generation check here: ☐
list additional USEPA waste code(s) and subcategorie(s), use the supplemental sheet provided (Form A2) and check here: ☐

W MUST THE WASTE BE MANAGED? In column 5 above, enter the letter (A, B1, B3, B4, C, D, or E) below that describes how the waste must be managed to comply with the land osal regulations (40 CFR 268.7). Please understand that if you enter the letter B1, B3, B4, or D, you are making the appropriate certification as provided below. (States authorized b to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be d d efer to those state citations instead of the 40 CFR citations.

RESTRICTED WASTE REQUIRES TREATMENT
This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.
☐ For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268 45."

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion in units as specified in 268.42 Table 1. I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS
"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 or 268 49, to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

RESTRICTED WASTE SUBJECT TO A VARIANCE
This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 5 above.
☐ For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT
"I certify under penalty of law I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D. I believe that the information I submitted is true, accurate and complete I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS
This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

eby certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information

ature W. B. Flynn Title PROJECT ENGINEER Date 3-24-2005

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

Generator Name DOE/ Bechtel Jacobs LLC Manifest Doc. No. 05B01

Profile No. 9307-02 State Manifest No.:

1. Is this waste a non-wastewater or wastewater? (See 40 CFR 268.2) Check ONE: Non-wastewater ☒ Wastewater ☐
2. Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory. Spent solvent standards are listed on the following page. If F039, multi-source leachate applies those constituents must be listed and attached by the generator. If D001-D043 requires treatment of the characteristic and meet 268.48 standards, then the underlying hazardous constituent(s) present in the waste must be listed and attached.

REF #	1. USEPA HAZARDOUS WASTE # (See 40 CFR 261)	2. SUBCATEGORY: ENTER THE SUBCATEGORY DESCRIPTION IF YOU ARE ABLE SIMPLY CHECK NONE. DESCRIPTION	NONE	3. HOW MUST THE WASTE BE MANAGED? ENTER THE APPROPRIATE LETTER BELOW
1	D008	Radioactive Lead Solids	☐	A
2			☐	
3			☐	
4			☐	

Identify F039 or D001-D043 underlying hazardous constituent (s), use the "F039/Underlying Hazardous Constituent Form" provided (Form B1) and check here ☐
UHCs are present in the waste upon its initial generation check here ☒
List additional USEPA waste code(s) and subcategorie(s), use the supplemental sheet provided (Form A2) and check here: ☐

HOW MUST THE WASTE BE MANAGED? In column 5 above, enter the letter (A, B1, B3, B4, C, D, or E) below that describes how the waste must be managed to comply with the land disposal regulations (40 CFR 268.7). Please understand that if you enter the letter B1, B3, B4, or D, you are making the appropriate certification as provided below. (States authorized by EPA to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed correct if you cite those state citations instead of the 40 CFR citations

RESTRICTED WASTE REQUIRES TREATMENT
This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.
☐ For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion in units as specified in 268.42 Table 1. I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS
"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 or 268 49, to remove the hazardous characteristic This decharacterized waste contains underlying hazardous constituents that require further treatment to meet treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

RESTRICTED WASTE SUBJECT TO A VARIANCE
This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 5 above
☐ For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268 45."

RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT
"I certify under penalty of law I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D. I believe that the information I submitted is true, accurate and complete I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS
This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions

I hereby certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information

Name Lee Dilts Title Proj Mgr Date 3/24/05

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

Generator Name DOE/ Bechtel Jacobs LLC Manifest Doc. No. 05C01

Profile No. 9307-02 State Manifest No.:

1. Is this waste a non-wastewater or wastewater? (See 40 CFR 268.2) Check ONE: Non-wastewater ☒ Wastewater ☐
2. Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory. Spent solvent standards are listed on the following page. If F039, multi-source leachate applies those constituents must be listed and attached by the generator. If D001-D043 requires treatment of the characteristic and meet 268.48 standards, then the underlying hazardous constituent(s) present in the waste must be listed and attached.

REF	USEPA HAZARDOUS WASTE CODE(S)	SUBCATEGORY: ENTER THE SUBCATEGORY DESCRIPTION IF NOT APPLICABLE SIMPLY CHECK NONE		HOW MUST THE WASTE BE MANAGED? ENTER LETTER FROM BELOW
		DESCRIPTION	NONE	
1	D008	Radioactive Lead Solids	☐	A
2	D006		☒	A
3	D011		☒	A
4	D009	Low Mercury	☐	A

dentify F039 or D001-D043 underlying hazardous constituent (s), use the "F039/Underlying Hazardous Constituent Form" provided (Form B1) and check here ☐
› UHCs are present in the waste upon its initial generation check here: ☒
ist additional USEPA waste code(s) and subcategorie(s), use the supplemental sheet provided (Form A2) and check here: ☐

V MUST THE WASTE BE MANAGED? In column 5 above, enter the letter (A, B1, B3, B4, C, D, or E) below that describes how the waste must be managed to comply with the lanc osal regulations (40 CFR 268.7). Please understand that if you enter the letter B1, B3, B4, or D, you are making the appropriate certification as provided below. (States authorized b , to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed fer to those state citations instead of the 40 CFR citations.

RESTRICTED WASTE REQUIRES TREATMENT

This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.

☒ For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion in units as specified in 268.42 Table 1. I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS

"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 or 268.49, to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

RESTRICTED WASTE SUBJECT TO A VARIANCE

This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 5 above.

☐ For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT

"I certify under penalty of law I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D. I believe that the information I submitted is true, accurate and complete I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS

This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

eby certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information.

ature [signature] Title Proj Mgr Date 3/24/05

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

Generator Name DOE/ Bechtel Jacobs LLC Manifest Doc. No. 05B03

ofile No. 9307-07 State Manifest No.:

1. Is this waste a non-wastewater or wastewater? (See 40 CFR 268.2) Check ONE: Non-wastewater ☒ Wastewater ☐
2. Identify ALL USEPA hazardous waste codes that apply to this waste shipment, as defined by 40 CFR 261. For each waste code, identify the corresponding subcategory, or check NONE if the waste code has no subcategory. Spent solvent standards are listed on the following page. If F039, multi-source leachate applies those constituents must be listed and attached by the generator. If D001-D043 requires treatment of the characteristic and meet 268.48 standards, then the underlying hazardous constituent(s) present in the waste must be listed and attached.

REF	USEPA HAZARDOUS WASTE CODE(S)	SUBCATEGORY ENTER THE SUBCATEGORY DESCRIPTION IF NOT APPLICABLE SIMPLY CHECK NONE DESCRIPTION	NONE	HOW MUST THE WASTE BE MANAGED? ENTER LETTER FROM BELOW
1	D008	Radioactive Lead Solids	☐	A
2			☐	
3			☐	
4			☐	

dentify F039 or D001-D043 underlying hazardous constituent (s), use the "F039/Underlying Hazardous Constituent Form" provided (Form B1) and check here ☐
) UHCs are present in the waste upon its initial generation check here: ☒
ist additional USEPA waste code(s) and subcategorie(s), use the supplemental sheet provided (Form A2) and check here: ☐

V MUST THE WASTE BE MANAGED? In column 5 above, enter the letter (A, B1, B3, B4, C, D, or E) below that describes how the waste must be managed to comply with the land osal regulations (40 CFR 268.7). Please understand that if you enter the letter B1, B3, B4, or D, you are making the appropriate certification as provided below. (States authorized by . to manage the LDR program may have regulatory citations different from the 40 CFR citations listed below. Where these regulatory citations differ, your certification will be deemed fer to those state citations instead of the 40 CFR citations.

RESTRICTED WASTE REQUIRES TREATMENT
This waste must be treated to the applicable treatment standards set forth in 40 CFR Part 268.40.
☐ For Hazardous Debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS
"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion in units as specified in 268.42 Table 1. I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

DECHARACTERIZED WASTE REQUIRES TREATMENT FOR UNDERLYING HAZARDOUS CONSTITUENTS
"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 or 268 49, to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

RESTRICTED WASTE SUBJECT TO A VARIANCE
This waste is subject to a national capacity variance, a treatability variance, or a case-by-case extension. Enter the effective date of prohibition in column 5 above
☐ For hazardous debris: "This hazardous debris is subject to the alternative treatment standards of 40 CFR Part 268.45."

RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT
"I certify under penalty of law I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

WASTE IS NOT CURRENTLY SUBJECT TO PART 268 RESTRICTIONS
This waste is a newly identified waste that is not currently subject to any 40 CFR Part 268 restrictions.

by certify that all information submitted in this and all associated documents is complete and accurate, to the best of my knowledge and information

ure [signature] Title Proj Mgr. Date 3/24/05

Form -A1
Page 1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 12 2005

REPLY TO THE ATTENTION OF DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William E. Murphie
Manager
Portsmouth/Paducah Project Office
U.S. Department of Energy
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

Mr. John Meersman
Manager of Projects
Bechtel Jacobs Company LLC
P.O. Box 900
Piketon, Ohio 45661

Re: Notice of Violation
RCRA Compliance Inspection
U.S. Department of Energy
Portsmouth Gaseous Diffusion Plant
Piketon, Ohio
OH7 890 008 983

Dear Messrs. Murphie and Meersman:

On March 8 and 9, 2005, representatives of the United States Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) inspected the U.S. Department of Energy (U.S. DOE) Portsmouth Gaseous Diffusion Plant located near Piketon, Ohio. The purpose of the inspection was to evaluate compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection checklists for your reference.

U.S. EPA did receive your April 11, 2005, letter regarding the updated Land Disposal Restriction (LDR) Notification Forms from Envirocare of Utah, Inc.

Based on information provided by U.S. DOE and Bechtel Jacobs personnel, review of records, and personal observations by the inspectors, U.S. EPA finds that U.S. DOE is in violation of the

Recycled/Recyclable . Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

following requirements of the Hazardous Waste RCRA Permit, Ohio Administrative Code (OAC) and the United States Code of Federal Regulations (CFR):

- A generator must send a one-time written notice to each treatment or storage facility receiving the waste, and place a copy in the generator's files. The notice must include the information in Column A of Table 1 of this rule. See, OAC § 3745-270-07(A)(2). The notice must include the applicable wastewater/nonwastewater category in rule 3745-270-02 of the OAC and subdivisions made within EPA hazardous waste number based on waste-specific criteria. See, OAC § 3745-270-07(A), Table 1: Generator Paperwork Requirements, Required Information #4. [40 CFR § 268.7] and RCRA Hazardous Waste Permit Condition B.36(j).

  During the records review portion of the inspection, the inspectors reviewed a number of out-bound hazardous waste manifests and attached LDR forms. It appeared that the out-bound hazardous waste manifest LDR forms for those shipments to Envirocare of Utah, Inc. did not have a box to mark either wastewater or non-wastewater. Therefore, U.S. DOE failed to comply with OAC Rule 3745-270-07(A)(2) [40 C.F.R. § 268.7] and violated RCRA Hazardous Waste Permit Condition B.36.(j).

Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a), U.S. EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above requirements.

You should submit your response to Walt Francis, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604. In addition, please submit a copy of your response to Melody Stewart at the OEPA Southeast District Office, 2195 Front Street, Logan, Ohio 43138.

If you have any questions regarding this letter, please contact Walt Francis of my staff at (312) 353-4921.

Sincerely yours,

For Paul Little, Chief
Compliance Section # 2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosures

cc: Melody Stewart, OEPA-Southeast District Office

USEC
A Global Energy Company

September 30, 2005

Mr. Walt Francis
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard, DE-9J
Chicago, Il 60604-3590

CERTIFIED MAIL
91 7108 2133 3930 4419 1005

RE: Notice of Violation of the RCRA Compliance Inspection, United States Enrichment Corporation Piketon, Ohio – OHD 987054723

Dear Mr. Francis.

This letter is in response to the United States Environmental Protection Agency's issuance of Notice of Violations (NOVs), dated August 29, 2005 and received September 7, 2005. The NOVs state that during an inspection of USEC's compliance with the Resource Conservation and Recovery Act (RCRA), USEC was in violation of certain provisions of the Satellite Accumulation and Universal Waste regulations under the Ohio Administrative Code and the United States Code of Federal Regulations

During the inspection of the X-330 Building, four polybottles were observed in a satellite accumulation area (SAA), next to the less than 90 day area. The polybottles were in fact moved by the generator from a Nuclear Criticality Safety (NCS) approved cleaning solution SAA on the second (cell) floor of the facility, to a temporary NCS approved SAA established for cleaning solutions on the first (operating) floor. With good intentions, the generators moved the polybottles to the temporary cleaning solutions SAA downstairs to maintain the " under the control of " requirement of OAC Rule 3745-52-34 (C) (1), but actually had overlooked the point of generation aspect of the regulation Attached is the Problem Report written the day of the inspection and the corrective actions taken. The polybottles were transferred to a 90 day area and labeled appropriately to return to compliance on March 8, 2005. A discussion was held with the employee involved. A required reading was issued to the applicable field waste personnel. In addition, applicable procedures are being revised to prevent recurrence. USEC considers this issue closed.

In response to the NOV issued on the Universal Waste Regulations, USEC would like to clarify that this facility is actually a large quantity handler of universal waste and not a small quantity handler as indicated in your letter USEC generates approximately 15,000 pounds of lamps per year at the facility, so the transition time to the new regulations was slower than

anticipated and was not fully implemented at the time of your March 7th and 8th 2005 inspection. The four plywood boxes identified in the XT-847 facility were properly labeled on March 9. Since the inspection, USEC has worked diligently and has regained compliance with the universal waste regulations throughout the site. Sitewide sweeps have been completed, Universal Waste Staging Areas set up, and appropriate labeling applied. Applicable procedures are being revised to provide guidance for proper handling of Universal Waste. In addition, USEC has purchased a subscription (which provides updates on changing regulations) that is being routinely monitored by USEC personnel to prevent recurrence. Attached is the Problem Report written the day of the inspections and corrective actions addressing your concern. USEC considers this issue closed.

On the same topic of universal waste, your letter references the requirements of (OAC 3745-273-15 (C) (1) through (6) [40 CFR 273.15 (c) (1) through (6)], which states, a small quantity handler of universal waste who accumulates universal waste must be able to demonstrate the length of time that universal waste has been accumulated from the date it becomes a waste or it is received. As mentioned, this facility is a large quantity generator and follows (OAC 3745-273-35) (C) (1) through (6) [40 CFR 273.35 (c) (1) through (6), which are basically the same as the small quantity handler. USEC has established universal waste accumulation areas and uses a well established Request for Disposal (RFD) system, along with a waste tracking data base, which meets all requirements of aforementioned regulations.

Your letter of August 29, 2005, also included an observation at the X-750 Garage Building, in which a blue pickup truck that appeared to have had an engine fire, still had the melted lead acid battery remaining in the engine compartment. As suggested, the battery was removed from the vehicle, evaluation completed, and has been released for recycling.

If you have any questions regarding this letter, please contact Gary Coriell of my staff at (740) 897-2260.

Sincerely,

Patrick D. Musser
General Manager

PDM:GDC.sj

Attachment

cc/att: Toni Brooks
Greg Fout
Melody Stewart, OEPA-SDO
Steve Toelle, USEC-HQ
Records Management/ESHR – RC
File – POEF-360-05-113

Issue Data Sheet

POLYBOTTLES FOUND IN SAA INSTEAD OF 90DAA

Response Due: **04/24/2005**
Responsible Ind.: -

Issue ID:	**X05I00784**	*Manager:*	**WORKMAN GR**
Finding No.:	**PR-PTS-05-00765**	*Organization:*	**38**
Status:	**OPEN**	*Group:*	**360**
Type:	**PR**	*Orig. Org.:*	**38**
Sub-Type:	**__**	*Orig. Group:*	**360**
Priority:	**0**	*Initiated By:*	**059930**
Location:	**X-330**	*Disc. Date:*	**03/07/2005 1630**
Building:	**X-330**	*Procedure:*	**XP2-EW-WM1032**

Flags:

		CAQ		

Description:

During USEPA/OEPA annual inspection, four polybottles were discovered at column L51 in a temporary Satellite Acculumulation Area (SAA). The containers should have been placed into a 90-Day Accumulation Area (90DAA) rather than transferred from one SAA to another SAA.

Attachments/Evidence:

1. PR-PTS-05-00765.pdf (485,633 bytes)

Closure Documents:

Documented discussion of PR with individual, extent of condition walkdown criteria, attendance sheet and required reading.

Actions Taken:

INITIATOR: Initiated PR. Notified applicable Field Services Specialist.

PSS: [PSS/APSS made no entry]

Potential Impact/Risk:

INITIATOR: Potential NOV.

PSS: [PSS/APSS made no entry]

Actions Recommended:

INITIATOR: Initiate TR to move polys to 90DAA. Relocate polys to 90DAA and label appropriately with accumulation start date.

PSS: [PSS/APSS made no entry]

This is NOT an industrial safety concern.

PSS Comments:

ɔgram SAR Descriptive
-Originator following up to correct

Remarks:

[No data entered.]

Response Section - DO NOT TRANSMIT CLASSIFIED INFORMATION TO COMMITMENT MANAGEMENT

1) Apparent Cause (check ONE): PP

2) Procedure Number Violated, If Applicable: NA

3) Management Response (including actions taken to correct or prevent recurrence):

04/20/2005: Waste was RFDd and transferred to 90 day area to regain compliance. SAA is question was closed. Discussed PR with individual and documented discussion results which were used to downgrade PR classification.(see attached) Issued required reading to applicable Field Waste Management personnel to discuss interpretation of regs.(see attached attendance sheet) Performed extent of condition to verify other SAAs were in compliance-no problems found (see attached criteria). Recommend WM procedure(s) be evaluated for improvement/clarification. [Response by STRICKLAND AJ (ANGELA).]

Actions:

ORG GROUP	DESCRIPTION	STATUS RESPONSIBLE REG. ENGINEER REGULATORY	REQ. DATE SCHED. DATE EXTEND DATE COMPL. DATE LAST REVISED	ACTION ID STEP NO. TYPE LEVEL / PRI
38 360	Evaluate and if necessary revise applicable WM procedure(s) to assure no misinterpretation of the SAA requirements. [VIEW ACTION ..]	**OPEN** STRICKLAND AJ [NONE]	Req: 09/30/2005 Sch: 09/30/2005 Ext: / / Cmp: / / Rev: 04/20/2005	X05I00784-001 001 OT CAQ / 0

Reponse and Approval History:

```
Response Submitted by Strickland AJ (058182) on 04/18/2005
-------------------------------------------------------------------------------------------------
     RESPONSIBLE PERSON.....................: Strickland AJ (058182) on 04/18/2005
                                              Entered by BPS User AS3 on 04/18/2005 at 13:45:08
     WORKMAN GR.............................: Workman GR (059409) on 04/20/2005
                                              Entered by BPS User GW1 on 04/20/2005 at 09:17:14
```

DATA REVISED
04/20/2005 at 10:06:28

READ ONLY **09/19/2005 03:31:21 PM**

Issue Data Sheet

FLUORESCENT BULBS, HID'S & VAPOR BULBS NOT LABELED

Response Due: **04/24/2005**
Responsible Ind.: **-**

Issue ID:	**X05I00786**	*Manager:*	**WORKMAN GR**
Finding No.:	**PR-PTS-05-00767**	*Organization:*	**38**
Status:	**OPEN**	*Group:*	**360**
Type:	**PR**	*Orig. Org.:*	**38**
Sub-Type:	**__**	*Orig. Group:*	**360**
Priority:	**0**	*Initiated By:*	**059930**
Location:	**Sitewide**	*Disc. Date:*	**03/07/2005 1630**
Building:	**X-SITE**	*Procedure:*	**NA**

Flags:

		CAQ		

Description:

g USEPA/OEPA annual inspection - it was identified that fluorescent lamps, HIDs, and sodium/mercury vapor bulbs were not
l ed/dated in accordance with the newly issued Universal Waste Rules.

Attachments/Evidence:

1. BULBSEPA.pdf (61,346 bytes)
2. stagingareas.pdf (46,128 bytes)
3. 2304_001.pdf (123,492 bytes) [Action 001]
4. 2305_001.pdf (100,354 bytes) [Action 020]
5. PR-PTS-05-00767.pdf (13,723 bytes)
6. 2586_001.pdf (8,938 bytes)
7. Bulbs_20050725130740.pdf (40,196 bytes) [Action 018]
   1. E-mail from D. Adams dated 7/11/05
   2. E-mail from L. Hawk dated 7/11/05
8. 20050726125647.pdf (118,931 bytes) [Action 003]
9. PR 05 00767 004 .pdf (157,271 bytes)
10. FW Light Bulb Sweep.rtf (4,439 bytes)
11. 1203_001.pdf (990,246 bytes) [Action 009]
    Walkdown/Verifications by Ops personnel.

[Provide Reference/Upload Attachment...]

Closure Documents:

Copy of e-mail between USEC and Ohio Environmental Protection Agency

ons Taken:

INITIATOR: Initiated PR.

[PSS/APSS made no entry]

Potential Impact/Risk:

INITIATOR: Potential NOV.

PSS: [PSS/APSS made no entry]

Actions Recommended:

INITIATOR: Label/date containers of universal waste identified above. Evaluate method to ensure compliance.

PSS: [PSS/APSS made no entry]

This is NOT an industrial safety concern.

PSS Comments:

- SAR Descriptive
- Flowdown concern
- Originator conducting followup to correct

Remarks:

[No data entered.]

Response Section - DO NOT TRANSMIT CLASSIFIED INFORMATION TO COMMITMENT MANAGEMENT

1) Apparent Cause (check ONE): OH

2) Procedure Number Violated, If Applicable:

3) Management Response (including actions taken to correct or prevent recurrence):

09/30/2005: In addition to the actions in the plan, WM obtained BLR services to assure updated regulations are available for review and implementation if necessary. [Response by STRICKLAND AJ (ANGELA).] [Approval Comment from RESPONSIBLE PERSON: A. Strickland for C. Hamilton] [Approval Comment from WORKMAN GR: Tim Taulbee for Gary Workman 9/30/2005]

04/28/2005: A strategy for dating and labeling bulbs was prepared and e-mailed to OEPA for review and concurrence (concurrence received on 4/11/05 per attached e-mail). Labels were made and placed on the bulb containers located inthe XT-847. An order was placed for Universal Waste lables to be used in the field. A shipment will be made on April 27th. [Response by FULK SE (SUE).]

Actions:

NO.	ORG GROUP	DESCRIPTION	STATUS RESPONSIBLE REG. ENGINEER REGULATORY	REQ. DATE SCHED. DATE EXTEND DATE COMPL. DATE LAST REVISED	ACTION ID STEP NO. TYPE LEVEL / PRI
1.	38 360	Develop and provide guidance for site-wide sweep of used bulbs. [VIEW ACTION...]	CLSD FULK SE [NONE]	Req: 06/15/2005 Sch: 06/15/2005 Ext: / / Cmp: 06/14/2005 Rev: 06/15/2005	X05I00786-001 001 OT CAQ / 0
2.	38	Set up designated bulb staging areas the the field [VIEW ACTION...]	CLSD STRICKLAND AJ	Req: 05/30/2005 Sch: 05/30/2005	X05I00786-002 002

	360			[NONE]	Ext: / / Cmp: 05/25/2005 Rev: 05/25/2005	OT CAQ / 0
	51 010	Conduct sweep of facilities/areas owned by your organization for used light bulbs and place in designated staging areas. [VIEW ACTION...]		CLSD ANZELMO JV [NONE]	Req: 07/30/2005 Sch: 07/30/2005 Ext: / / Cmp: 07/26/2005 Rev: 07/27/2005	X05I00786-003 003 OT CAQ / 0
4.	26 860	Conduct sweep of facilities/areas owned by your organization for used light bulbs and place in designated staging areas [VIEW ACTION..]		CLSD BOUTS RR [NONE]	Req: 07/30/2005 Sch: 07/30/2005 Ext: / / Cmp: 07/27/2005 Rev: 08/02/2005	X05I00786-004 004 OT CAQ / 0
5.	31 822	Conduct sweep of facilities/areas owned by your organization for used light bulbs and place in designated staging areas. [VIEW ACTION...]		CLSD DAVIS PT [NONE]	Req: 07/30/2005 Sch: 07/30/2005 Ext: 07/07/2005 Cmp: 07/29/2005 Rev: 08/02/2005	X05I00786-006 006 OT CAQ / 0
6.	41 040	Conduct sweep of facilities/areas owned by your organization for used light bulbs and place in designated staging areas. [VIEW ACTION...]		CLSD CONKEL ME [NONE]	Req: 07/30/2005 Sch: 07/30/2005 Ext: / / Cmp: 08/10/2005 Rev: 08/10/2005	X05I00786-007 007 OT CAQ / 0
7.	79 009	Conduct sweep of facilities/areas owned by your organization for used light bulbs and place in designated staging areas [VIEW ACTION.]		CLSD CUTLIP LB [NONE]	Req: 07/30/2005 Sch: 07/30/2005 Ext: / / Cmp: 06/20/2005 Rev: 06/21/2005	X05I00786-008 008 OT CAQ / 0
8.	12 070	Conduct sweep of facilities/areas owned by your organization for used light bulbs and place in designated staging aras. [VIEW ACTION...]		CLSD FOSSON DA [NONE]	Req: 07/30/2005 Sch: 07/30/2005 Ext: / / Cmp: 08/02/2005 Rev: 08/04/2005	X05I00786-009 009 OT CAQ / 0
9.	74 014	Conduct sweep of facilities/areas owned by your organization for used light bubls and place in designated staging areas. [VIEW ACTION...]		CLSD JORDAN RW [NONE]	Req: 07/30/2005 Sch: 07/30/2005 Ext: / / Cmp: 07/28/2005 Rev: 08/02/2005	X05I00786-010 010 OT CAQ / 0
10.	38 030	Conduct sweep of facilities/areas owned by your organization for used light bulbs and place in designated staging areas. [VIEW ACTION...]		CLSD WORKMAN GR [NONE]	Req: 07/30/2005 Sch: 07/30/2005 Ext: / / Cmp: 07/29/2005 Rev: 08/02/2005	X05I00786-013 013 OT CAQ / 0
11.	75 151	Conduct sweep of facilities/areas owned by your organization for used light bulbs and place in designated staging areas. [VIEW ACTION...]		CLSD HAIRSTON GM [NONE]	Req: 07/30/2005 Sch: 07/30/2005 Ext: / / Cmp: 08/02/2005 Rev: 08/04/2005	X05I00786-014 014 OT CAQ / 0
12.	96 951	Conduct sweep of facilities/areas owned by your organization for used light bulbs and place in designated staging areas. [VIEW ACTION...]		CLSD HENRICKS JH [NONE]	Req: 07/30/2005 Sch: 07/30/2005 Ext: / / Cmp: 07/15/2005 Rev: 07/15/2005	X05I00786-015 015 OT CAQ / 0
13.	93 930	Conduct sweep of facilities/areas owned by your organization for used light bulbs and place in designated staging areas. [VIEW ACTION...]		CLSD LAWSON WL [NONE]	Req: 07/30/2005 Sch: 07/30/2005 Ext: / / Cmp: 07/20/2005 Rev: 07/21/2005	X05I00786-017 017 OT CAQ / 0
14.	98 957	Conduct sweep of facilities/areas owned by your organization for used light bulbs and place in designated staging areas. [VIEW ACTION...]		CLSD VOGELSANG JE [NONE]	Req: 07/30/2005 Sch: 07/30/2005 Ext: / / Cmp: 07/25/2005 Rev: 07/26/2005	X05I00786-018 018 OT CAQ / 0
15.	38 360	Revise appropriate Waste Management procedures to provide guidance for handling of used bulbs [VIEW ACTION...]		**OPEN** FULK SE [NONE]	Req: 09/30/2005 Sch: 12/31/2005 Ext: 09/21/2005 Cmp: / / Rev: 09/21/2005	X05I00786-019 019 OT CAQ / 0
	38 360	Provide guidance to generators in the field for labeling and handling of bulbs. [VIEW ACTION...]		CLSD FULK SE [NONE]	Req: 06/15/2005 Sch: 06/15/2005 Ext: / / Cmp: 06/14/2005	X05I00786-020 020 OT CAQ / 0

Rev: 06/15/2005

ınse and Approval History:

```
Response Submitted by Fulk SE (058518) on 04/22/2005
-------------------------------------------------------------------------------------------------
     RESPONSIBLE PERSON.....: Fulk SE (058518) on 04/28/2005
                              Entered by BPS User SF3 on 04/28/2005 at 12:48:21
     WORKMAN GR.............: Workman GR (059409) on 04/28/2005
                              Entered by BPS User GW1 on 04/28/2005 at 12:50:27

Response Submitted by Strickland AJ (058182) on 09/29/2005
-------------------------------------------------------------------------------------------------
     RESPONSIBLE PERSON.....: Strickland AJ (058182) on 09/29/2005
                              Entered by BPS User AS3 on 09/29/2005 at 13:08:45
     WORKMAN GR.............: Taulbee TD (059891) on 09/30/2005
                              Entered by BPS User TT2 on 09/30/2005 at 07:04:34
```

DATA REVISED
09/30/2005 at 08:16:39 by SE1

CAROLYN HAMILTON **09/30/2005 08:43:18 AM**

STATE PART B HAZARDOUS WASTE PERMIT INSPECTION CHECKLIST

DIVISION OF HAZARDOUS WASTE MANAGEMENT
OHIO EPA
March 2005

Table of Contents
U.S. DOE - Portsmouth Gaseous Diffusion Plant
04-66-0680

RCRA Inspection Checklist 1

General Conditions of Permit 2
- General Permit Compliance and Activities 2

Permit Modification, Revision, Revocation 5

Site Entry - Availability of Records 7

Recordkeeping Requirements 7
- Confidentiality 7
- Operating Record 7
- Annual Report Requirement 9
- Sampling/monitoring Recordkeeping Requirements 9
- Waste Minimization Requirements 10

Off-site Shipments/manifest Requirements 11
- Manifest Requirements/wastes Received On-site 11

Waste Analysis/waste Analysis Plan 11
- General Requirements 12
- Waste Analysis Quality Assurance Requirements 12

General Inspection Requirements 14

Security Provisions/facility Operation 15

Personnel Training 16

Required Equipment 16

Contingency Plan Requirements 17
- Emergency Procedures 17
- Emergency Authorities 18
- Emergency Coordinator 18
- Amendment of Plan 18
- Implementation of Plan 19

Contingency Plan Requirements 20
- Closure Plan/amendment 20
- Closure Activities 20

Requirements for Ignitable, Reactive or Incompatible Wastes 22

Storage of Hazardous Wastes in Containers 24
- Condition of Containers 25
- Inspections 25
- Containment System 26
- Required Aisle Space 27
- Closure and Post-closure 27
- Container Storage of Residual Waste 27

Land Disposal Restriction Requirements 28
- Prohibition Against Dilution 28
- Generator Requirements 28
- Notification/certification 29
- Storage of Land Disposal Restricted Wastes 31

OHIO PART B PERMITTED FACILITY
RCRA INSPECTION CHECKLIST

Facility: U.S. DOE - Portsmouth Gaseous Diffusion Plant Ohio Permit #: 04-66-0680

Co-operator: Bechtel Jacobs Company LLC

Address: 3930 U.S. Route 23 South
Piketon, OH 45661

USEPA ID#: OH7 890 008 983
Facility Phone: 740-897-5010

County: Pike Time: 8:00 -

Inspection Date: 3/7/05 - 3/9/05

Advance notice of inspection given?____(Yes) __X_(No)
If so, how far in advance? _____

	Name	***Agency/Title***	***Phone***
Inspector(s):	Walt Francis	U.S. EPA	312-353-4921
	Melody Stewart	Ohio EPA	740-380-5256
Facility Representative(s):	~~Russell Vranicar~~ Melda Mahaffey	USDOE	740-897-??
	~~Cliff Beeks~~ Chris Williams	~~Bechtel Jacobs~~	~~740-897-3579~~
	~~Mary Williams~~	~~Bechtel Jacobs~~	~~740-897-5010~~
	~~Sandy Childers~~ Greg Simcox	~~Bechtel Jacobs~~	~~740-897-2336~~

Is facility operating as a generator? Yes __X_____ No _____

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

PERMIT STATUS

Permit Issued: March 15, 2001
Permit Effective Date: March 15, 2001
Permit Expiration Date: March 15, 2006

	STORAGE		TREATMENT		DISPOSAL
X	Container		Tank		Injection Well
	Tank		Surface Impoundment		Landfill
	Waste Pile		Incinerator		Land Application
	Surface Impoundment		Thermal Treatment		Surface Impoundment

GENERAL CONDITIONS OF PERMIT

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1. Has the expiration date of the permit passed? If so: Yes__No_X_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 _X_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? (Or upon a later date if the permittee can demonstrate good cause for late submittal.) [Condition A.6.(a)] Yes__No___ N/A _X_RMK#___

NOTE: *The permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:*

   A. The permittee has submitted a timely and complete application for a renewal permit under OAC rule 3745-50-40; and

   B. Through no fault of the permittee, a new permit has not been issued pursuant to OAC rule 3745-50-40 on or before the expiration date of the permit. [Condition A.6.(b)]

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.26] Yes_X_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? [Condition A.1.(b) and A.5] Yes__No_X_ N/A ___RMK#___

4. Have any provisions of the permit been identified as invalid? [Condition A.4.] Yes__No_X_ N/A ___RMK#___

5. Has the facility identified any instances of noncompliance with the permit, RC Chapter 3734. or the rules adopted thereunder, which may endanger human health or the environment? If so: Yes__No_X_ N/A ___RMK#___

   a. Did the facility immediately report orally the following to Ohio EPA's Emergency Response Section within 24 hours of becoming aware of the circumstance(s): [Condition A.20.(a)]

i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and — Yes__No__ N/A _X_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 or operator? — Yes__No__ N/A _X_RMK#__

B. Name, address and telephone number of the facility? — Yes__No__ N/A _X_RMK#__

C. Name and quantity of material(s) involved? — Yes__No__ N/A _X_RMK#__

D. The extent of injuries, if any? — Yes__No__ N/A _X_RMK#__

E. An assessment of the actual or potential hazard to the environment and human health outside the facility where this is applicable? — Yes__No__ N/A _X_RMK#__

F. Estimated quantity and disposition of recovered material that resulted from the incident? — Yes__No__ N/A _X_RMK#__

6. Did the permittee provide a written report to Ohio EPA's Emergency Response Section and DHWM, SEDO within five days of the time the permittee became aware of the circumstances reported in Question 5? [Condition A.21.] If so did the report contain: — Yes__No__ N/A _X_RMK#__

a. A description of the noncompliance and its cause (including exact dates and times)? — Yes__No__ N/A _X_RMK#__

b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? — Yes__No__ N/A _X_RMK#__

c. Steps taken or planned to minimize the impact on human health and the environment and to reduce and prevent recurrence of the noncompliance? — Yes__No__ N/A _X_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 becomes aware of the circumstances. [Condition A.21.(c)]*

7.	Has the permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8]	Yes___No___ N/A _X_RMK#___
8.	Has the permittee identified any other instances of noncompliance not provided for in Question 5?	Yes___No___ N/A _X_RMK#___
	a. If so, did the permittee report to the director within a month of the time at which the permittee is aware of such noncompliance? [Condition A.22.]	Yes___No___ N/A _X_RMK#___
	b. Do the reports provided contain the information set forth in Condition A.20?	Yes___No___ N/A _X_RMK#___
9.	Has the permittee planned any physical alterations or additions to the permitted facility?	Yes___No_X_ N/A ___RMK#___
	a. If so, has the facility provided Ohio EPA with notice of such changes? [Condition A.15]	Yes___No___ N/A _X_RMK#___

Note: *Such notification does not waive the permittee's duty to comply with the permit pursuant to Condition A.5.*

REMARKS

PERMIT MODIFICATION, REVISION, REVOCATION

1. Has the permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.] Contingency plan update. Permit mod 11/19/04 — Yes X No___ N/A ___RMK#___

2. Has the permit been transferred to a new owner or operator? [Condition A.18.] If so, — Yes__No X N/A ___RMK#___

   a. Has the transfer been conducted in accordance with R.C. Chapter 3734. and the rules adopted thereunder? [Condition A.18.]; and — Yes__No___ N/A _X_RMK#___

   b. Before transferring ownership did the permittee notify the new owner in writing of the requirements of R.C. Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.18.] — Yes__No___ N/A _X_RMK#___

3. Has the permittee submitted reports of compliance or noncompliance with, or any progress reports on the requirements contained 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 _X_RMK#___

4. Has the permittee furnished relevant information which Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, or to determine compliance with the permit? [Condition A.10] — Yes X No___ N/A ___RMK#___

5. Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10] — Yes X No___ N/A ___RMK#___

6. 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 HWFB? If so, — Yes__No X N/A ___RMK#___

   a. Has the permittee promptly submitted such facts or corrected information to the appropriate entity? [Condition A.24.] — Yes__No___ N/A _X_RMK#___

7.	Is the permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications to the application? [Condition A.14.(c)]	Yes_X_No___ N/A ___RMK#___
8.	Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14.(c)]	Yes_X_No___ N/A ___RMK#___

REMARKS

SITE ENTRY - AVAILABILITY OF RECORDS

1. As specified in Condition A.11., has the permittee allowed the director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection, 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 X No ___ N/A ___ RMK#___

   b. Have access to and copy any records required to be kept under the conditions of the permit? — Yes X No ___ N/A ___ RMK#___

   c. Inspect at reasonable times facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit? — Yes X No ___ N/A ___ RMK#___

   d. Sample, document, or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by R.C. Chapter 3734. and the rules adopted thereunder? — Yes X No ___ N/A ___ RMK#___

RECORDKEEPING REQUIREMENTS

CONFIDENTIALITY

1. Has the permittee requested confidentiality of any information of the permit in accordance with R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.25.] — Yes ___ No X N/A ___ RMK#___

OPERATING RECORD

2. Is the permittee maintaining a written operating record at the facility as set forth in OAC rule 3745-54-73 and Condition B.22. of the permit which contains the following elements:

   a. A description and the quantity of each hazardous waste received? — Yes X No ___ N/A ___ RMK#___

   b. Method(s) and date(s) of treatment, storage or disposal at the facility? — Yes X No ___ N/A ___ RMK#___

c. The location of each hazardous waste within the facility and the quantity at each location? Yes X No___ N/A ___RMK#___

3. Is the permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents as part of its operating record: [Condition A.28.]

a. Waste analysis plan in accordance with OAC rule 3745-54-13 and the conditions of the permit? Yes X No___ N/A ___RMK#___

b. Contingency plan in accordance with OAC rule 3745-54-53 and the conditions of the permit? Yes X No___ N/A ___RMK#___

c. Closure plan in accordance with OAC rule 3745-55-12 and the conditions of the permit? Yes X No___ N/A ___RMK#___

d. Personnel training plan and records required by OAC rule 3745-54-16 and the conditions of the permit? Yes X No___ N/A ___RMK#___

e. Inspection schedules developed in accordance with OAC rules 3745-54-15 and 3745-55-74 and the conditions of the permit? Yes X No___ N/A ___RMK#___

4. Have any of the documents identified in Question #3 been revised as required by the permit? If so, Yes X No___ N/A ___RMK#___

a. Has the permittee submitted the revisions to Ohio EPA? [Condition A.28.(b)] Yes X No___ N/A ___RMK#___

b. Has the permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.28.(b)] Yes X No___ N/A ___RMK#___

5. Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from the date of inspection? [Condition A.28.(c)] Yes X No___ N/A ___RMK#___

ANNUAL REPORT REQUIREMENT

6. 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 and the conditions of the permit? [Condition B.25.] — Yes X No ___ N/A ___ RMK#___

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

7. In compliance with Condition A.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 X No ___ N/A ___ RMK#___

   b. Individual(s) who performed the sampling or measurement? — Yes X No ___ N/A ___ RMK#___

   c. Date(s) analyses were performed? — Yes X No ___ N/A ___ RMK#___

   d. Individual(s) who performed the analyses? — Yes X No ___ N/A ___ RMK#___

   e. Analytical technique(s) or method(s) used? — Yes X No ___ N/A ___ RMK#___

   f. Results of such analyses? — Yes X No ___ N/A ___ RMK#___

8. 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 A.12.(a)] — Yes X No ___ N/A ___ RMK#___

9. Has Ohio EPA requested submittal of any reports or other information required by the conditions of the permit from the permittee? If so, — Yes ___ No X N/A ___ RMK#___

   a. Have the submittals been signed and certified according to OAC rules 3745-50-58(K) and 3745-50-42? [Condition A.13.] — Yes ___ No ___ N/A X RMK#___

WASTE MINIMIZATION REQUIREMENTS

10. Has the permittee submitted a Waste Minimization Report to Ohio EPA meeting the requirements of Condition A.29. of the permit within 180 days of permit journalization? Yes X No___ N/A ___RMK#___

    a. Following the first submittal as identified above in Question #10, has the permittee submitted biennial updates to this report as required by Condition A.29.(c)? Yes X No___ N/A ___RMK#___

REMARKS

OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS

1. Is all hazardous and mixed waste transported from the facility by a properly registered transporter of hazardous and mixed waste in accordance with all applicable laws, rules and standards? [Condition A.16.] — Yes X No___ N/A ___RMK#___

MANIFEST REQUIREMENTS/WASTES RECEIVED ON-SITE

2. Upon receipt of the manifests, has the permittee signed and dated each copy of the manifest? [OAC 3745-54-71(A)(1); Condition B.24.] — Yes X No___ N/A ___RMK#___

3. For any significant discrepancies identified upon receipt of the manifest(s): did the permittee note such discrepancies on the manifest(s) in accordance with OAC rule 3745-54-71(A)(2) and Condition B.24? — Yes___No___ N/A _X_RMK#___

   a. Did the permittee attempt to reconcile the discrepancy? [Condition B.24.] — Yes___No___ N/A _X_RMK#___

   b. If the discrepancy was not resolved within 15 days: did the permittee submit a report, including a copy of the manifest, to the director in accordance with OAC rule 3745-54-72(B)? [Condition B.24.] — Yes___No___ N/A _X_RMK#___

4. Does the permittee immediately give the transporter at least one copy of the signed manifest? [OAC 3745-54-71(A)(3); Condition B.24.] — Yes X No___ N/A ___RMK#___

5. Does the permittee provide the generator with a copy of the manifest within 30 days of receipt of waste on-site? [OAC 3745-54-71(A)(4); Condition B.24.] — Yes X No___ N/A ___RMK#___

6. Does the permittee retain a copy of each manifest on-site for at least three years from the date of delivery? [OAC 3745-54-71(A)(5); Condition B.24.] — Yes X No___ N/A ___RMK#___

7. Has the permittee received any hazardous waste or mixed waste from off-site, other than as described in Condition B.2(b)? — Yes___No X N/A ___RMK#___

WASTE ANALYSIS/WASTE ANALYSIS PLAN

GENERAL REQUIREMENTS

1. Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information which is necessary to properly treat, store or dispose of the waste in accordance with OAC Chapters 3745-54 to 3745-57 and Condition B.3 of the permit (Section C of the approved permit application)? [OAC 3745-54-13(A)(1)] — Yes X No ___ N/A ___ RMK#___

2. Since the last inspection, were any wastes generated by the facility which were unable to be characterized through process knowledge? If so, — Yes ___ No X N/A ___ RMK#___

   a. Were the waste analysis procedures described in Section C of the approved permit application followed? — Yes ___ No ___ N/A X RMK#___

3. Is the permittee following the procedures described in the approved waste analysis plan (Section C of approved permit application) and the requirements of OAC rule 3745-54-13? [Condition B.3.] — Yes X No ___ N/A ___ RMK#___

4. Is the permittee maintaining waste analysis data in the facility's operating record as required by OAC rule 3745-54-73 and Condition B.22. of the permit? — Yes X No ___ N/A ___ RMK#___

WASTE ANALYSIS QUALITY ASSURANCE REQUIREMENTS

5. Is the permittee verifying the analysis of each waste stream annually as part of its quality assurance program in accordance with SW-846? [Condition B.3.] — Yes X No ___ N/A ___ RMK#_

6. In accordance with Condition B.3. of the permit, does the permittee's quality assurance plan ensure that the permittee is, at a minimum:

   a. Maintaining property functional instruments? — Yes X No ___ N/A ___ RMK#___

   b. Using approved sampling/analytical methods? — Yes X No ___ N/A ___ RMK#___

   c. Verifying the validity of sampling and analytical procedures and performance of correct calculations? — Yes X No ___ N/A ___ RMK#___

7.	If the permittee uses a contract laboratory to perform analyses, did the permittee inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this permit?	Yes X No___ N/A ___RMK#___

REMARKS

GENERAL INSPECTION REQUIREMENTS

1. Is the permittee following the inspection procedures and schedules described in Section F of the approved permit application and the requirements of OAC rule 3745-54-15? [Condition B.5.] — Yes__ No__X__ N/A ___RMK#_1_

2. Does the permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [OAC 3745-54-15(A)(1)(2)] — Yes__X__No___ N/A ___RMK#___

3. 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? — Yes__X__No___ N/A ___RMK#___

   a. Is the schedule kept at the facility? [OAC 3745-54-15(B)(2)] — Yes__X__No___ N/A ___RMK#___

   b. Does the schedule identify the types of problems which are to be looked for during the inspection? [OAC 3745-54-15(B)(3)] — Yes__X__No___ N/A ___RMK#___

   c. Does the schedule include inspection of areas subject to spills daily when in use and according to other applicable regulations when not in use? [OAC 3745-54-15(B)(4)] — Yes__X__No___ N/A ___RMK#___

4. 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__X__No___ N/A ___RMK#___

5. Is the permittee maintaining records of inspections for a minimum of three years? [Condition B.5.] — Yes__X__No___ N/A ___RMK#___

6. 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__X__No___ N/A ___RMK#___

   b. Signature of inspector? — Yes__X__No___ N/A ___RMK#___

   c. Notation of observations made? — Yes__X__No___ N/A ___RMK#___

d. Date/nature of any repairs or other remedial actions? Yes X No___ N/A ___RMK#___

SECURITY PROVISIONS/FACILITY OPERATION

1. Is the permittee complying with the security provisions of OAC rule 3745-54-14(B)(1) and B(2) and (C) and Section F of the approved permit application, including the following: [Condition B.4.]

   a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility; Yes X No___ N/A ___RMK#___

   b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility; or Yes X 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 X No___ N/A ___RMK#___

2. In accordance with OAC rule 3445-54-14(C), does the permittee have signs reading "Danger-Unauthorized Personnel Keep Out" posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? [Condition B.4.] Yes X No___ N/A ___RMK#___

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 waters? [Condition B.1.] Yes X No___ N/A ___RMK#___

REMARKS

RMK #1 - Building X-326 L Cage, inspector unable to view certain containers during weekly inspections. – Inspection was completed.

PERSONNEL TRAINING

1. Is the facility conducting personnel training in accordance with Section H of the approved permit application and the following requirements of OAC rule 3745-54-16: [Condition B.6.]

   a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC 3745-54-16(A)(B)(C)] — Yes X 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 3745-54-16(B)? — Yes X No ___ N/A ___ RMK#___

   c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(B)? — Yes ___ No X N/A ___ RMK# 1

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 X No ___ N/A ___ RMK#___

REQUIRED EQUIPMENT

1. Is the permittee, at a minimum, maintaining the equipment set forth in the approved permit application (Section G) at the facility? [Condition B.9.] — Yes X No ___ N/A ___ RMK#___

2. Is the permittee inspecting, testing, and maintaining the equipment specified in Question #1 to assure its proper operation as specified in OAC rule 3745-54-33, the inspection plans and Section G of the approved permit application? [Condition B.10.] — Yes X 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 Section G of the approved permit application? [Condition B.11.] — Yes X No ___ N/A ___ RMK#___

CONTINGENCY PLAN REQUIREMENTS

EMERGENCY PROCEDURES

1. In compliance with Condition B.13.(a) of the permit, does the permittee:

   a. Familiarize the emergency response agencies likely to respond to an emergency at the facility with:

      i. The location and layout of the facility? Yes X No___ N/A ___RMK#___

      ii. Properties of hazardous waste and mixed waste managed at the facility and associated hazards? Yes X No___ N/A ___RMK#___

      iii. Places where facility personnel will normally be working? Yes X No___ N/A ___RMK#___

      iv. Entrances to and roads inside the facility? Yes X No___ N/A ___RMK#___

      v. Evacuation routes as depicted in Section G of the permit application? Yes X No___ N/A ___RMK#___

   b. Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the facility, and any further requirements imposed by the permit?; and Yes X No___ N/A ___RMK#___

   c. Familiarize local police and fire departments, local hospitals and other local emergency services with the properties of hazardous waste and mixed waste managed at the facility and the types of injuries which could result from fires, explosions or a release of hazardous wastes at the facility? Yes X No___ N/A ___RMK#___

2. Is the permittee in compliance with the requirements of OAC rule 3745-54-56 and Section G of the approved permit application regarding emergency procedures? [Condition B.20.] Yes X No___ N/A ___RMK#___

EMERGENCY AUTHORITIES

3. 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_X_ 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 _X_RMK#___

4. 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.] — Yes_X_No___ N/A ___RMK#___

5. Has the permittee notified the agencies in Question #4, in writing, within ten days of the effective date of any amendments or revisions to the Plan? [Condition B.18.(b)] — Yes_X_No___ N/A ___RMK#___

6. 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 in accordance with OAC rule 3745-54-53? [Condition B.18.(c)] — Yes_X_No___ N/A ___RMK#___

EMERGENCY COORDINATOR

7. Is the permittee in compliance with the requirements of OAC rule 3745-54-55 with regard to the emergency coordinator? [Condition B.19.] — Yes_X_No___ N/A ___RMK#___

AMENDMENT OF PLAN

8. Is the permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17.] — Yes_X_No___ N/A ___RMK#___

Note: *Also see Question #4 of RECORDKEEPING REQUIREMENTS to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.*

MPLEMENTATION OF PLAN

9. Has there been a fire, explosion or release of hazardous waste or mixed waste or constituents at the facility since the last date of inspection as described by Condition B.14. of the permit? If so, — Yes__No_X_ 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? [Condition B.14.] — Yes__No__ N/A _X_RMK#___

   b. Did the permittee collect and manage released material, emergency response material and by-products as hazardous waste or mixed waste until making a demonstration to Ohio EPA that such materials are not subject to Ohio hazardous waste rules? [Condition B.16.] — Yes__No__ N/A _X_RMK#___

   c. 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 _X_RMK#___

      i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23.] ***Note:*** *See also Conditions A.21. and A.22. of the permit for additional reporting/recordkeeping requirements.* — Yes__No__ N/A _X_RMK#___

   d. 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? [Condition B.23.] — Yes__No__ N/A _X_RMK#___

REMARKS

CONTINGENCY PLAN REQUIREMENTS

CLOSURE PLAN/AMENDMENT

1. Is the permittee maintaining at the facility, the approved closure plan which contains the elements set forth in OAC rule 3745-55-12? [Condition B.29.] — Yes X No___ N/A ___RMK#___

2. Has the permittee amended the closure plan? If so, — Yes___No X N/A ___RMK#___

   a. Has the plan been amended in accordance with OAC rule 3745-55-12(C)? [Condition B.28.] — Yes___No___ N/A X 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.*

CLOSURE ACTIVITIES

3. Has the permittee closed the facility? If so, — Yes___No X N/A ___RMK#___

   a. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26.] — Yes___No___ N/A X RMK#___

   b. Did the permittee carry-out the approved closure plan as set forth in the permit application and terms and conditions of the permit? [Condition B.26.] — Yes___No___ N/A X RMK#___

   c. After receiving the final volume of hazardous waste, did the permittee remove from the facility all hazardous waste and mixed 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 X RMK#___

   d. 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 X RMK#___

   e. Did the permittee notify Ohio EPA's Southeast District Office within five working days prior to all rinseate and soil sampling? [Condition B.32.(b)] — Yes___No___ N/A X 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 _X_RMK#__

REMARKS

REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

1. Is the permittee following the procedures as specified in OAC rules 3745-54-17, 3745-55-77 and Section F of the approved application when managing ignitable, reactive and/or incompatible wastes? [Conditions B.7.(a) and C.10. and C.11.] Yes X No___ N/A ___RMK#___

2. Does the permittee ***not*** store incompatible waste ***except*** in accordance with OAC rules 3745-54-17(B) and 3745-55-77, and the terms and conditions of this permit? [Condition C.11.(a)] Yes X No___ N/A ___RMK#___

3. Does the permittee take precautions to prevent placing hazardous waste or mixed waste in an unwashed container that previously held an incompatible waste or material? [Condition C.11.(b)] Yes X No___ N/A ___RMK#___

4. Does the permittee ensure that all containers of incompatible wastes are physically separated from other incompatible wastes or materials by a wall, berm, dike, or other device in accordance with OAC rule 3745-55-77 and the Appendix to OAC rule 3745-55-99? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

   a. Are all containers of aqueous hazardous acids (ph $\leq$ 2) and caustics ph $\geq$ 12.5) sorted on different pallets and physically separated in different rooms? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

   b. Are aqueous acids and caustics in poly bottles, and other containers requiring nuclear criticality safety spacing physically separated in the same room by a dike? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

   c. Are containers of cyanides and sodium metals being stored in rooms physically separate from other incompatible wastes or other incompatible materials? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

5. Does the permittee provide electrical grounding for all containers, tanks and transport vehicles during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(b)] Yes X No___ N/A ___RMK#___

6.	Does the permittee provide and require the use of spark proof tools during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(c)]	Yes X No___ N/A ___RMK#___
7.	Does the permittee prohibit smoking and open flames in areas where hazardous wastes are managed and post appropriate signs? [Condition B.7.(d)]	Yes X No___ N/A ___RMK#___
8.	As required by OAC rule 3745-55-76, does the permittee store containers of ignitable or reactive wastes greater than 15 meters (50 feet) away from the Portsmouth Gaseous Diffusion Plant reservation boundary? [Condition C.10.(a)]	Yes X No___ N/A ___RMK#___

REMARKS

STORAGE OF HAZARDOUS WASTES IN CONTAINERS

NOTE: *The requirements of permit 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.*

1. Is the permittee storing in containers, only those wastes as specified in Section A of the Part B permit application? [Condition C.1.(a), C.2.] Yes X No ___ N/A ___ RMK#___

2. Does the permittee limit the total quantity of containerized waste in the container storage area to 133,000 gallons at any given time in the permitted container areas, located in building X-326 and no more than 5,456,000 gallons at any given time in the permitted storage areas located in building X-7725? [Condition C.1.(a)] Yes X No ___ N/A ___ RMK#___

NOTE: *For the purposes of compliance with the capacity limitation of the permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity. For example, a 55-gallon drum will be considered to be holding 55 gallons of waste, regardless of the actual quantity stored in the drum. [Condition C.1.(b)]*

3. When accumulating waste within the permitted X-7725 and X-326 container storage area, does the permittee ensure that the total amount of waste (both > 90 days and < 90 days) does not exceed the maximum container storage inventory established under Condition C.1.? [Condition C.1.(c)] Yes X No ___ N/A ___ RMK#___

4. Are hazardous wastes subject to regulation by the permit stored only at the designated container storage area described in the approved permit application? (See Section D of the permit application) [Condition C.1.(a)] Yes X No ___ N/A ___ RMK#___

5. Is each container stored clearly marked to identify its contents and the date each period of accumulation/storage begins? (See Section D of the permit application) [Condition C.3.] Yes X No ___ N/A ___ RMK#___

6. Does the permittee store hazardous waste in the types of containers described in Section D of the approved permit application? [Condition C.1.(a)] Yes X No ___ N/A ___ RMK#___

CONDITION OF CONTAINERS

8. Are containers holding hazardous wastes in good condition? [Condition C.3.] — Yes X No___ N/A ___RMK#___

   a. If not, (e.g., severe rusting, structural defects) did the permittee transfer the hazardous waste from such a container to a container that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit and OAC rule 3745-55-71? [Condition C.3.] — Yes___No_ N/A _X__RMK#___

9. 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 C.4.] — Yes X No___ N/A ___RMK#___

10. Is storage conducted in the container storage containment system as described in Condition C.1. of the permit and Section D of the approved permit application? [Condition C.5.(a)] — Yes X No___ N/A ___RMK#___

11. 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 C.5.(b)] — Yes X No___ N/A ___RMK#___

12. Are lab-pack wastes handled in compliance with applicable storage requirements? [Condition C.5.(c)] — Yes X No___ N/A ___RMK#___

13. Are lab-pack wastes packaged in drums containing absorbent material that is compatible with the wastes? [Condition C.5.(d)] — Yes X No___ N/A ___RMK#___

INSPECTIONS

14. Is the permittee inspecting the container area weekly in accordance with OAC rules 3745-54-15, and 3745-54-73 and the approved inspection schedule (Section F) to detect leaking containers and deterioration of containers and the containment system? [Condition C.8.] — Yes X No___ N/A ___RMK#___

   a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken? [Condition C.8.] — Yes X No___ N/A ___RMK#___

b. On days when containerized waste are added or removed to and/or from any of the permitted areas for storage, does the permittee conduct inspections as described in Section F of the approved Part B permit application and maintain the inspection results in the facility operating record? [Condition C.8.] Yes X No___ N/A ___RMK#___

CONTAINMENT SYSTEM

15. Does the permittee maintain the containment system as described in Section D of the approved Part B permit application, including: [Condition C.6.] Yes X No___ N/A ___RMK#___

a. Sufficient design to contain 10% of the total volume of the containers or the volume of the largest container, whichever is greater? [Condition C.6.(b)] Yes X No___ N/A ___RMK#___

b. A system which is free of gaps and sufficiently impervious to contain leaks and spills? Yes X No___ N/A ___RMK#___

c. Equipped with a coating which is compatible with each waste stored in the area? Yes X No___ N/A ___RMK#___

d. *For those wastes which are deemed incompatible with liner material:* Has the permittee installed a separate secondary containment structure within the existing structure which is equipped with a compatible liner? Yes___No___ N/A X RMK#___

16. Has the permittee had a spill or leak of wastes or an accumulation of precipitation in the containment system? If so, Yes___No X N/A ___RMK#___

a. Are spilled or leaked wastes and accumulated precipitation removed from the sump or collection area in a timely manner? [Condition C.6.(c)] Yes___No___ N/A X RMK#___

b. Does removal of spilled/leaked wastes and accumulated precipitation occur within 24 hours from the time the spill or leak waste is discovered? [Condition C.6.(c)] Yes___No___ N/A X RMK#___

REQUIRED AISLE SPACE

17. Is the permittee maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in the event of an emergency to any area of the facility as required by OAC rule 3745-54-35? [Condition B.12.] — Yes X No__ N/A ___RMK#___

CLOSURE AND POST-CLOSURE

18. At closure of the container storage area, did the permittee remove all hazardous waste, hazardous waste residues, mixed waste and mixed waste residues from the containment system, in accordance with the procedures set forth in the approved closure plan (Section I of the permit application)? [Condition C.13.(a)] — Yes___No___ N/A _X_RMK#___

19. During closure, if the permittee could not demonstrate that all contaminated soils could be removed, did the permittee close the unit and perform post-closure care following a plan approved by Ohio EPA? [Condition C.13.(b)] — Yes___No___ N/A _X_RMK#___

CONTAINER STORAGE OF RESIDUAL WASTE

20. Is the permittee complying with the provisions of Section C-2E of the application as amended pursuant to Condition B.2.(b) of this permit? — Yes X No___ N/A ___RMK#__

LAND DISPOSAL RESTRICTION REQUIREMENTS

PROHIBITION AGAINST DILUTION

1. Has the permittee updated the annual Federal Facility Compliance Act Schedule? [OAC rule 3745-270-50; Condition B.36.] — Yes X No ___ N/A ___ RMK#___

2. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [OAC rule 3745-270-40 through 49; Condition B.36.(c)] — Yes ___ No X N/A ___ RMK#___

   a. As a substitute for adequate treatment to achieve compliance with LDR treatment standards? — Yes ___ No ___ N/A X RMK#___

   b. To circumvent the effective date of a prohibition (e.g., to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)? — Yes ___ No ___ N/A X RMK#___

   c. To otherwise avoid a prohibition in OAC rule 3745-270-30 through -39? — Yes ___ No ___ N/A X RMK#___

   d. To otherwise avoid a prohibition imposed by Section 3004(d) of RCRA? — Yes ___ No ___ N/A X RMK#___

NOTE: *If the answer to any of Questions 2(a) through 2(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of OAC rule 3745-270-03 [Condition B.36.]. Dilution of wastes is permissible under some conditions. See OAC rule 3745-270-03(B).*

GENERATOR REQUIREMENTS

3. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No ___ N/A ___ RMK#___

   a. ***For determinations based solely on knowledge of the waste***: Is supporting data used to make this determination being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No ___ N/A ___ RMK#___

   b. ***For determinations based upon analytical testing***: Is a copy of waste analysis data being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No ___ N/A ___ RMK#___

	Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g., wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [OAC rule 3745-270-07; Condition B.36.(e)]	Yes~~X~~ No X N/A ___RMK# 1
5.	Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [OAC rule 3745-270-07(A); Condition B.36.(e)]	Yes X No___ N/A ___RMK#___
6.	Does the entity generate any listed waste(s) which are restricted from land disposal? If so,	Yes X No___ N/A ___RMK#___
	a. Do such wastes also exhibit hazardous waste characteristics as identified in OAC rules 3745-51-20 to 3745-51-24?	Yes X No___ N/A ___RMK#___
	b. ***For listed wastes which also exhibit a characteristic*:** Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [OAC rule 3745-270-09(A)]	Yes X No___ N/A ___RMK#___

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC rule 3745-270-09(B)].*

NOTIFICATION/CERTIFICATION

7.	***For wastes that do not meet treatment standards:*** Has the generator submitted a one-time written notice to the treatment/storage facility receiving the wastes, that wastes being received do not meet treatment standards? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)]	Yes X No___ N/A ___RMK#___
	If so, does the notice including the following:	
	a. EPA hazardous waste number? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)]	Yes X No___ N/A ___RMK#___
	b. Appropriate treatment standard for the waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)]	Yes X No___ N/A ___RMK#___

c. The manifest number associated with the first shipment of waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No___ N/A ___RMK#___

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No___ N/A ___RMK#___

e. Applicable wastewater/non-wastewater category [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes ~~X~~ No X N/A ___RMK#1

f. For hazardous debris, list the contaminants subject to treatment, as described in paragraph (B) of OAC rule 3745-270-45; and an indication that these contaminants are being treated to comply with OAC rule 3745-270-45. — Yes X No___ N/A ___RMK#___

g. For contaminated soil list the constituents subject to treatment as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. — Yes X No___ N/A ___RMK#___

8. ***For wastes that meet treatment standards:*** Does the generator submit a one-time written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes___No___ N/A X RMK#___

If so, does the notice/certification including the following:

a. EPA hazardous waste identification number? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes___No___ N/A X RMK#___

b. The corresponding treatment standards and applicable prohibitions for the waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes___No___ N/A X RMK#___

c. The manifest number associated with the shipment of waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes___No___ N/A X RMK#___

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes___No___ N/A _X_RMK#___

e. Is the certification signed by the generator or an authorized representative? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes___No___ N/A _X_RMK#___

f. For contaminated soil list the constituents subject to treatment as described as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. — Yes___No___ N/A _X_RMK#___

9. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years? [OAC rule 3745-270-07(A)(8); Condition B.36.(j)] — Yes_X_No___ N/A ___RMK#___

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

NOTE: *The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate LDR wastes that do not meet treatment standards in tanks or containers. A LQG who stores LDR wastes on-site for greater than 90 days becomes a operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.*

NOTE: *The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [OAC rule 3745-270-50(E); 40 CFR 268.50(e)]*

10. Is the owner/operator storing LDR restricted wastes in containers? If so, is each container marked with the following information in accordance with OAC rule 3745-270-50(A)(2)(a) [Condition B.36(l)] — Yes_X_No___ N/A ___RMK#___

a. The identification of the contents? — Yes_X_No___ N/A ___RMK#___

b. The date which accumulation began? — Yes_X_No___ N/A ___RMK#___

NOTE: *A TSD facility may store LDR wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [OAC rule 3745-270-50(B)]. During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.*

11. Are LDR wastes being stored at the facility for greater than one year? If so,

    a. Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [OAC rule 3745-270-50(B); Condition B.36(m)] Yes X No___ N/A ___RMK#___

Rmk
I (1) Shipments to Envirocare UTAH, LDR form - no [illegible]/ non-waste designation

LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] **If so**: Yes X No ☐ N/A ___RMK#___

   a. **For determinations based solely on knowledge of the waste:** Is supporting data retained on-site? [3745-270-07(A)(6)] Yes X No ☐ N/A ___RMK#___

   b. **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes X No ☐ N/A ___RMK#___

2. Has the generator determined each Ohio EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2), see Table 1] Yes X No ☐ N/A ___RMK#___

3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes ~~X~~ No ☒ N/A ___RMK# 1

4. Does the generator generate a characteristic hazardous waste? **If so:** Yes X No___ N/A ___RMK#___

   a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes X No ☐ N/A ___RMK#___

NOTE: *If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.*

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] **If so:** Yes X No___ N/A ___RMK#___

   a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes X No ☐ N/A ___RMK#___

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]*

6. Has the generator **correctly** determined if restricted wastes meet or exceed treatment standards? [3745-270-07(A)(1)] Yes X No ☐ N/A ___RMK#___

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03]

Yes X No ❑ N/A ___RMK#___

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

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)]

Yes ❑ No X N/A ___RMK#___

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)]

Yes ❑ No___ N/A X RMK#___

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] **If so:**

Yes___ No X N/A ___RMK#___

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

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] **If so:**

Yes ___ No X N/A ___ RMK#___

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

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? **If so:**

Yes ___ No X N/A ___ RMK#___

a. Has the facility complied with 3745-270-04?

Yes ___ No ❑ N/A X RMK#___

REMARKS

(1) LDR FORMS FOR SHIPMENTS TO ENVIROCARE LACKED WASTEWATER / NON-WASTEWATER ID.

NOTIFICATION AND CERTIFICATION REQUIREMENTS

12. If a generators' waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1? [3745-270-07(A)(2)] — Yes _X_ No ❑ N/A ___ RMK#___

13. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1? [3745-270-07(A)(3)] — Yes ___ No ❑ N/A _X_ RMK#___

14. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1? [3745-270-07(A)(4)] — Yes ___ No ❑ N/A _X_ RMK#___

15. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1? [3745-270-07(A)(9)] — Yes ___ No ❑ N/A _X_ RMK#___

16. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] **If so:** — Yes ___ No X N/A ___ RMK#___

    a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] — Yes ___ No ❑ N/A _X_ RMK#___

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

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

REMARKS

LARGE QUANTITY UNIVERSAL WASTE HANDLER INSPECTION CHECKLIST

Company: U.S. Department of Energy-Portsmouth Gaseous Diffusion Plant USEPA ID#: OH7 890 008 983

Street: US Route 23 S City: Piketon

County: Pike State: Ohio ZIP: 45661

Mailing Address PO Box 700, Piketon, Ohio 45661-0700
(IF DIFFERENT FROM ABOVE)

Telephone: (740)897-5010 Fax: ( )

Owner/ Operator: Federal Government/Co-Operator Bechtel Jacobs Company LLC
(IF DIFFERENT FROM ABOVE)

Street:

City: State: Zip:

Inspection Date(s): 3/7/05 - 3/9/05 Time(s): 8:00 am -

Inspection Announced? ____ YES __X__ NO If so, how much advance notice given? ____

Inspectors: Melody Stewart, OEPA and Walt Francis, U.S. EPA

Facility Rep(s): Melda [illegible]
Chris Guilliams
Greg [illegible]
[illegible]

WASTE MANAGEMENT ACTIVITY	
X	Containers
	Tank(s)
	Other (specify)

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

LARGE QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

GENERAL REQUIREMENTS

1. Has the LQUWH obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)] — Yes ___ No ☐ N/A ☑ RMK#___

PROHIBITIONS

2. Did the LQUWH dispose of universal waste? [3845-273-31(A)] — Yes ☑ No___ N/A ___RMK#___

3. Did the LQUWH dilute or treat universal waste, except when responding to releases or by managing specific wastes as provided in OAC 3745-273-33? [3745-273-31(B)] — Yes ☐ No___ N/A ☑ RMK#___

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES:

4. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)] — Yes ___ No ☐ N/A ☑ RMK#___

5. If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? — Yes ___ No ☐ N/A ☑ RMK#___

6. Does the LQUWH conduct any of the following activities:

   a. Sort batteries by type? — Yes ☑ No___ N/A ___RMK#___

   b. Mix battery types in one container? — Yes___ No ☑ N/A ___RMK#___

   c. Discharge batteries to remove the electric charge? — Yes___ No ☑ N/A ___RMK#___

   d. Regenerate used batteries? — Yes___ No ☑ N/A ___RMK#___

   e. Disassemble them into individual batteries or cells? — Yes___ No ☑ N/A ___RMK#___

   f. Remove batteries from consumer products? — Yes ☑ No___ N/A ___RMK#___

   g. Remove the electrolyte from the battery? — Yes___ No ☑ N/A ___RMK#___

If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-33(A)(2)] — Yes ☐ No___ N/A X RMK#___

If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)] — Yes ___ No ☐ N/A X RMK#___

a. If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)] — Yes ___ No ☐ N/A X RMK#___

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)] — Yes ___ No ☐ N/A X RMK#___

8. Are the battery(ies) or container(s) of batteries located with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-34(A)] — Yes ___ No ☒ N/A ___ RMK# 1

UNIVERSAL WASTE PESTICIDES

9. Does the LQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-33(B)(1)] — Yes ___ No ☐ N/A X RMK#___

10. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-33(B)(2)] — Yes ___ No ☐ N/A X RMK#___

11. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 66-992, except for paragraph (C) of 3745-66-97; rule 3745-66-991 and 3745-66-992 of the OAC met? [3745-273-33(B)(3)] — Yes ___ No ☐ N/A X RMK#___

12. Is pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-33(B)(4)] — Yes ___ No ☐ N/A X RMK#___

13. Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)] — Yes ___ No ☐ N/A X RMK#___

14. Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)]

Yes ___ No ☐ N/A X RMK#___

UNIVERSAL WASTE THERMOSTATS

15. Are thermostats that show evidence of leakage, spillage or damage that could cause leaks, properly contained? [3745-273-33(C)(1)]

Yes ___ No ☐ N/A X RMK#___

16. If the thermostats are contained, are the containers closed, structurally sound, compatible with contents of the thermostats and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(C)(1)]

Yes ___ No ☐ N/A X RMK#___

17. If the mercury-containing ampules are removed, does the LQUWH: [3745-273-33(C)(1)]

a. Remove the ampules in a manner to prevent breakage and is the removal done over a containment device? [3745-273-33(C)(2)(a)(b)]

Yes ___ No ☐ N/A X RMK#___

b. Have a clean-up system readily available to transfer spilled material to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-33(C)(2)(c)(d)]

Yes ___ No ☐ N/A X RMK#___

c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-33(C)(2)(e)]

Yes ___ No ☐ N/A X RMK#___

d. Ensure employees are thoroughly familiar with proper waste handling and emergency procedures? [3745-273-33(C)(2)(f)]

Yes ___ No ☐ N/A X RMK#___

e. Ensure removed ampules are stored in closed, non-leaking containers that are in good condition? [3734-273-33(C)(2)(g)]

Yes ___ No ☐ N/A X RMK#___

f. Pack removed ampules in containers with packing material to prevent breaking during storage, handling and transportation? [3745-273-33(C)(2)(h)]

Yes ___ No ☐ N/A X RMK#___

18. If mercury or clean-up residues resulting from spills or leaks or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-33(C)(3)(a)] Yes ___ No ☐ N/A ✓ RMK#___

a. If the waste is characteristic, was it managed in compliance with 3745-50 through 3745-69? (*The handler is considered the generator of the mercury, residues, and/or other waste and is subject to Chapter 3745-52)* [3745-273-33(C)(3)(b)] Yes ___ No ☐ N/A ✓ RMK#___

b. If the mercury, residues and/or other waste are not hazardous, are they managed in compliance with applicable law? [3745-273-33(C)(3)(c)] Yes ___ No ☐ N/A ✓ RMK#___

19. Are the thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)" [3745-273-34] Yes ___ No ☐ N/A ✓ RMK#___

ACCUMULATION TIME

20. Is the waste accumulated for less than one year? [3745-273-35(A)] Yes ✓ No___ N/A ___ RMK#___

a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on handler to demonstrate) [3745-273-35(B)] Yes ___ No ☐ N/A ✓ RMK#___

NOTE: ***Accumulation is defined as date generated or date received from another handler.***

21. Has the length of time the universal waste has been accumulated documented by ***one*** of the following: [3745-273-35(C)] Yes ✓ No ☐ N/A ___ RMK#___

a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-35(C)(1)] Yes ✓ No ✓ N/A ___ RMK#___

b. Marking or labeling the individual item of universal waste with the date that it became a waste or was received? [3745-273-35(C)(2)] Yes___ No ✓ N/A ___ RMK#___

c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-35(C)(3)] Yes___ No ✓ N/A ___ RMK#___

d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-35(C)(4)]

Yes___ No X N/A ___RMK#___

e. Placing the universal waste in a specific accumulation area and identifying the earliest that any universal waste in the area became a waste or was received? [3745-273-35(C)(5)]

Yes___ No X N/A ___RMK#___

f. Any other method which clearly demonstrates the length of time the universal waste has been accumulated from the date it became a waste or is received? [3745-273-35(C)(6)]

Yes___ No X N/A ___RMK#___

EMPLOYEE TRAINING

22. Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36]

Yes X No ☐ N/A ___RMK#___

RESPONSE TO RELEASES

23. Were releases of universal waste and other residues immediately contained? [3745-273-37(A)]

Yes ___ No ☐ N/A X RMK#___

24. Was the released material characterized? [3745-273-37(B)]

Yes ___ No ☐ N/A X RMK#___

25. If the released material was a hazardous waste, was it managed as required in OAC 3745-50 through 3745-69? *(If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52)* [3745-273-37(C)]

Yes ___ No ☐ N/A X RMK#___

OFF-SITE SHIPMENTS

NOTE: ***If a LQUWH self-transports wastes, then the handler must comply with the Universal Waste transporter requirements.***

26. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)]

Yes Y No ☐ N/A ___RMK#___

NOTE: ***LQUWHs are prohibited to send waste to any other facility.***

27. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-38(C)] — Yes ✓ No ☐ N/A ___ RMK#___

28. Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)] — Yes ✓ No ☐ N/A ___ RMK#___

29. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do <u>one of the following</u>: — Yes ___ No ☐ N/A ✓ RMK#___

a. Receive the waste back? [3745-273-38(E)(1)] — Yes___ No___ N/A ✓ RMK#___

b. Agree to where shipment will be sent? [3745-273-38(E)(2)] — Yes___ No___ N/A ✓ RMK#___

30. If a handler rejects a partial or full load from another handler, does the receiver handler contact the originating handler and discuss <u>one of the following</u>: — Yes ___ No ☐ N/A ✓ RMK#___

a. Sending the waste back to originating handler? [3745-273-38(F)(1)] — Yes___ No___ N/A ✓ RMK#___

b. Sending the shipment to a destination facility? [3745-273-38(F)(2)] — Yes___ No___ N/A ✓ RMK#___

31. If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)] — Yes ___ No ☐ N/A ✓ RMK#___

32. If the handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-38(H)] — Yes ___ No ☐ N/A ✓ RMK#___

TRACKING UNIVERSAL WASTE SHIPMENTS

33. Are universal waste received from another handler? If so: Yes___ No X N/A ___RMK#___

a. Is a record of each shipment kept? [3745-273-39(A)] Yes ___ No ☐ N/A X RMK#___

NOTE: ***This record can be in the form of a log, invoice, manifest, bill of lading, or other shipping document. This also applies to question No. 35(a).***

34. Does the record include the following:

a. Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)] Yes ___ No ☐ N/A X RMK#___

b. Quantity of each type of universal waste? [3745-273-39(A)(2)] Yes ___ No ☐ N/A X RMK#___

c. Date received? [3745-273-39(A)(3)] Yes ___ No ☐ N/A X RMK#___

35. Is universal waste shipped to another handler? If so: Yes___ No___ N/A X RMK#___

a. Is a record of each shipment kept? [3745-273-39(B)] Yes ___ No ☐ N/A X RMK#___

36. Does the record include the following?

a. Name and address of universal waste handler, destination facility, or foreign destination? [3745-273-39(B)(1)] Yes ___ No ☐ N/A X RMK#___

b. Quantity of each type of universal waste? [3745-273-39(B)(2)] Yes ___ No ☐ N/A X RMK#___

c. Date shipped? [3745-273-39(B)(3)] Yes ___ No ☐ N/A X RMK#___

37. Are records kept for three years? [3745-273-39(C)(1)(2)] Yes X No ☐ N/A ___RMK#___

EXPORTS

38. Is waste being sent to a foreign destination? If so: Yes___ No X N/A ___RMK#___

a. Does the large quantity handler comply with primary exporter requirements in OAC rules 3745-52-53 and 3745-52-57, and paragraphs (A)(1) - (A)(6) and (B) of 3745-52-56? [3745-273-40(A)] Yes ___ No ☐ N/A X RMK#___

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA "Acknowledgment of Consent" 37845-52-50 to -52-57? [3745-273-40(B)]

Yes ___ No ☐ N/A ___ RMK#___

c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)]

Yes ___ No ☐ N/A ___ RMK#___

REMARKS

(1) Lead acid Batteries sent off-site for recycling -

USED OIL INSPECTION CHECKLIST

Company: U.S. DOE-Portsmouth Gaseous Diffusion Plant EPA I.D.: OH7 890 008 983

Street: 3930 U.S. Route 23 South City: Piketon

County: Pike State: Ohio Zip: 45661

Mailing Address: (IF DIFFERENT FROM ABOVE)

Telephone: 740-897-5010 Fax:

Owner/ Operator: (IF DIFFERENT FROM ABOVE)

Street:

City: State: Zip:

Inspection Date(s): March 7 - 9, 2005 Time(s): 8:00 am - 5:00 pm

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

	Name	Affiliation	Telephone
Inspectors:	Walt Francis	U.S. EPA	312-353-4921
	Melody Stewart	Ohio EPA	740-380-5256
Facility Rep(s):	Melda Rafferty	U.S. DOE	

USED OIL MANAGEMENT ACTIVITY

X Generator/CollectionCenter/Aggregation	____ Marketer
____ Transporter/Transfer Facility	____ Off-Spec Burner
____ Processor/Re-Refiner	____ Other (specify)
____ No Generation	

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: — Yes___No_X_ 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 _X_ RMK#___

2. Is used oil being used as a dust suppressant? [3745-279-12(B)] — Yes ❑ No _X_ 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#___

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 _X_ 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 _X_ 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 _X_ 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 _X_ 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 _X_ No ❑ N/A ___RMK#___

   b. Contained the release? — Yes _X_ No ❑ N/A ___RMK#___

   c. Cleaned up and properly managed the used oil and other materials? — Yes _X_ No ❑ N/A ___RMK#___

   d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? — Yes _X_ No ❑ N/A ___RMK#___

10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: — Yes___No_X_ N/A ___RMK#___

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 X RMK#___

b. Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour? Yes ___ No ☐ N/A X RMK#___

c. Are the combustion gases from heater vented to the ambient air? Yes ___ No ☐ N/A X 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 X 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 X No ☐ N/A ___RMK#___

REMARKS

USED OIL TRANSPORTER AND TRANSFER FACILITIES

16. Does the used oil transporter process used oil? [3745-279-41(A)] If so: Yes___No___ N/A ___RMK#___

Is the used oil transporter in compliance with the requirements for processors/re-refiners in 3745-279-50 to 3745-279-59 (except as provided in 3745-279-41(B) and (C))? [3745-279-41(A)] Yes ___ No ❑ N/A ___RMK#___

17. Has the used oil transporter notified Ohio EPA or U.S. EPA and obtained an EPA ID#? [3745-279-42(A)] Yes ___ No ❑ N/A ___RMK#___

18. Has the used oil transporter delivered all used oil to:

a. Another used oil transporter that has an EPA ID#? [3745-279-43(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. A used oil processing/re-refining facility that has an EPA ID#? [3745-279-43(A)(2)] Yes ___ No ❑ N/A ___RMK#___

c. An off-spec used oil burning facility that has an EPA ID#? [3745-279-43(A)(3)] Yes ___ No ❑ N/A ___RMK#___

d. An on-spec used oil burning facility? [3745-279-43(A)(4)] Yes ___ No ❑ N/A ___RMK#___

19. Has the used oil transporter complied with all applicable USDOT regulations (49 CFR 171 to 180)? [3745-279-43(B)] Yes ___ No ❑ N/A ___RMK#___

20. Has the used oil transporter had a discharge of used oil? If so: Yes___No___ N/A ___RMK#___

Did they take the appropriate action as outlined in 3745-279-43(C)? Yes ___ No ❑ N/A ___RMK#___

21. Has the used oil transporter determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? [3745-279-44(A)] Yes ___ No ❑ N/A ___RMK#___

22. Does the transporter retain all records of analyses and information used to comply with 3745-279-44 for at least three years? [3745-279-44(A)] Yes ___ No ❑ N/A ___RMK#___

23. Does the owner/operator of a used oil transfer facility:

a. Stored used oil in tanks, containers, or units subject to regulation under 3745-54 to 3745-57 or 3745-65 to 3745-69? [3745-279-45(B)] Yes ___ No ❑ N/A ___RMK#___

b. Stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-45(C)] Yes ___ No ❑ N/A ___RMK#___

c. Provide secondary containment for containers used to store used oil as required by 3745-279-45(D)? [3745-279-45(D)] Yes ___ No ❑ N/A ___RMK#___

d. Provide secondary containment for existing aboveground tanks required by 3745-279-45(E)? [3745-279-45(E)] Yes ___ No ❑ N/A ___RMK#___

e. Provide secondary containment for new aboveground tanks as required by 3745-279-45(F)? [3745-279-45(F)] Yes ___ No ❑ N/A ___RMK#___

f. Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil?" [3745-279-45(G)] Yes ___ No ❑ N/A ___RMK#___

g. Upon detection of a release of used oil: [3745-279-45(H)]

i. Stopped the release? Yes ___ No ❑ N/A ___RMK#___

ii. Contained the release? Yes ___ No ❑ N/A ___RMK#___

iii. Cleaned up and managed the used oil and other materials? Yes ___ No ❑ N/A ___RMK#___

iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No ❑ N/A ___RMK#___

24. Does the used oil transporter keep a record of each shipment of used oil? [3745-279-46(A)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the generator, transporter or processor/re-refiner who provides the used oil for transport? [3745-279-46(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include the EPA ID# of the generator, transporter or processor/re-refiner (if applicable) that provides the used oil for transport? [3745-279-46(A)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include the quantity of used oil accepted? [3745-2679-46(A)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include the date of acceptance? [3745-279-46(A)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Does each record include the signature of a representative of the generator, transporter, processor/re-refiner that provided the used oil for transport? [3745-279-46(A)(5)] Yes ___ No ❑ N/A ___RMK#___

25. Does the used oil transporter keep a record of each shipment of used oil that is delivered to another used oil transporter, burner, processor/re-refiner, or disposal facility? [3745-279-46(B)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the receiving facility or transporter? [3745-279-46(B)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include the EPA ID# of the receiving facility or transporter? [3745-279-46(B)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include the quantity of used oil delivered? [3745-279-46(B)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include the date delivered? [3745-279-46 Yes ___ No ❑ N/A ___RMK#___

e. Does each record include the signature of a representative of the receiving facility or transporter (intermediate rail transporters are not required to sign a record of delivery)? [3745-279-46(B)(5)] Yes ___ No ❑ N/A ___RMK#___

26. Does the used oil transporter who exports used oil to a foreign country comply with 3745-279-46(B)(1) to (B)(4)? [3745-279-46(C)] Yes ___ No ❑ N/A ___RMK#___

27. Does the used oil transporter retain all records required under 3745-279-46 for at least three years? [3745-279-46(D)] Yes ___ No ❑ N/A ___RMK#___

28. Does the used oil transporter generate residues from the storage or transportation of used oil? Yes___No___ N/A ___RMK#___

If so, are they managed as specified in 3745-279-10(E)? [3745-279-47] Yes ___ No ❑ N/A ___RMK#___

REMARKS

USED OIL STANDARDS FOR PROCESSORS AND RE-REFINERS

29. Has the used oil processor and/or re-refiner notified Ohio EPA or U.S. EPA and obtained an EPA ID#? [3745-279-51(A)] Yes ___ No ❑ N/A ___RMK#___

30. Does the owner/operator of a used oil processing or re-refining facility comply with the following:

a. Is the facility maintained and operated to minimize the possibility of fire, explosion, or release of used oil? [3745-279-52(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Is the facility equipped with the equipment in 3745-279-52(A)(2), if necessary? [3745-279-52(A)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Are all communication systems, alarm systems, fire protection equipment, spill control equipment, and decontamination equipment tested and maintained as required? [3745-279-52(A)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Is there access to communication or alarm system(s)? [3745-279-52(A)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Is the required aisle space being maintained? [3745-279-52(A)(5)] Yes ___ No ❑ N/A ___RMK#___

f. Are arrangements maintained with local authorities? [3745-279-52(A)(6)] Yes ___ No ❑ N/A ___RMK#___

31. Has the owner/operator of a used oil processing and re-refining facility complied with the following requirements:

a. Has a contingency plan been developed? [3745-279-52(B)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does the contingency plan contain the requirements of 3745-279-52(B)(2)? Yes ___ No ❑ N/A ___RMK#___

c. Have copies and revisions been maintained and submitted to all local authorities? [3745-279-52(B)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Is the contingency plan reviewed and amended whenever one of the events in 3745-279-52(B)(4) occurs? [3745-279-52(B)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Is an emergency coordinator on the premises or on call at all times to meet the requirements of 3745-279-52(B)(5) and (6)? Yes ___ No ❑ N/A ___RMK#___

32. Does the used oil processor/re-refiner determine whether the total halogen content of the used oil being managed at the facility is above or below 1000 ppm? [3745-279-53(A)] Yes ___ No ❑ N/A ___RMK#___

33. Does/has the used oil processor/re-refiner:

a. Only store used oil in tanks, containers or units subject to regulation under 3745-54 to 3745-57 or 3745-65 to 3745-69? [3745-279-54(A)] Yes ___ No ❑ N/A ___RMK#___

b. Only store used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-54(B)] Yes ___ No ❑ N/A ___RMK#___

c. Provide secondary containment for containers as required by 3745-279-54(C)? [3745-279-45(C)] Yes ___ No ❑ N/A ___RMK#___

d. Provide secondary containment for existing aboveground tanks as required by 3745-279-54(D)? Yes ___ No ❑ N/A ___RMK#___

e. Provide secondary containment for new aboveground tanks as required by 3745-279-54(E)? Yes ___ No ❑ N/A ___RMK#___

f. Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil" [3745-279-54(F)] Yes ___ No ❑ N/A ___RMK#___

g. Upon detection of a release of used oil, done the following in accordance with 3745-279-54(G):

i. Stopped the release? Yes ___ No ❑ N/A ___RMK#___

ii. Contained the release? Yes ___ No ❑ N/A ___RMK#___

iii. Cleaned up and managed the used oil and other materials? Yes ___ No ❑ N/A ___RMK#___

iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No ❑ N/A ___RMK#___

h. Performed closure of aboveground tanks and containers in accordance with 3745-279-54(H)? Yes ___ No ❑ N/A ___RMK#___

34. Has the owner/operator of the used oil processing/re-refining facility developed, kept on-site, and followed a written waste analysis plan which meets the requirements in 3745-279-53? Yes ___ No ❑ N/A ___RMK#___

35. Does the used oil processor/re-refiner keep a record of each shipment of used oil accepted for processing/re-refining? [3745-279-56(A)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the transporter who delivered the used oil to the processor? [3745-279-56(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include the name and address of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include the EPA ID # of the transporter who delivered the used oil to the processor/re-refiner? [3745-279-56(A)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include the EPA ID # (if applicable) of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Does each record include the quantity of used oil accepted? [3745-279-56(A)(5)] Yes ___ No ❑ N/A ___RMK#___

f. Does each record include the date of acceptance? [3745-279-56(A)(6)] Yes ___ No ❑ N/A ___RMK#___

36. Does the used oil processor/re-refiner keep a record of each shipment of used oil that is shipped to a used oil burner, processor/re-refiner, or disposal facility? [3745-279-56(B)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the transporter who delivers the used oil to the burner, processor/re-refiner or disposal facility [3745-279-56(B)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include the name and address of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include the EPA ID# of the transporter that delivers the used oil to the burner, processor/re-refiner or disposal facility? [3745-279-56(B)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include the EPA ID# of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Does each record include the quantity of used oil shipped? [3745-279-56-(B)(5)] Yes ___ No ❑ N/A ___RMK#___

f. Does each record include the date of shipment? [3745-279-56(B)(6)] Yes ___ No ❑ N/A ___RMK#___

37. Does the used oil processor/re-refiner retain all records required under 3745-279-56 for at least three years? [3745-279-56(C)] Yes ___ No ❑ N/A ___RMK#___

38. Does the owner/operator keep an operating record at the facility? [3745-279-57(A)(1)] Yes ___ No ❑ N/A ___RMK#___

a. Does the operating record include records and results of used oil analysis performed as described in the analysis plan required under 3745-279-55? [3745-279-57(A)(2)(a)] Yes ___ No ❑ N/A ___RMK#___

b. Are summary reports and details of all incidents that require implementation of the contingency plan as specified in 3745-279-52(B) maintained in the operating record? [3745-279-57(A)(2)(b)] Yes ___ No ❑ N/A ___RMK#___

39. Does the used oil processor/re-refiner report to the director in the form of a letter, on a biennial basis by March 1, the following information:

a. The EPA ID#, name and address of the processor/re-refiner? [3745-279-57(B)(1)] Yes ___ No ❑ N/A ___RMK#___

b. The calendar year covered by the report? [3745-279-57(B)] Yes ___ No ❑ N/A ___RMK#___

c. The quantities of used oil accepted for processing/re-refining and the manner in which the used oil is processed/re-refined, including the specific processes employed? [3745-279-57(B)] Yes ___ No ❑ N/A ___RMK#___

40. Does the used oil processor/re-refiner, who initiates a shipment of used oil off-site, use a used oil transporter that has a EPA ID#? [3745-279-58] Yes ___ No ❑ N/A ___RMK#___

41. Does the used oil processor/re-refiner generate residues from the storage, processing or re-refining of used oil? [3745-279-59] Yes ___ No___ N/A ___RMK#___

If so, are the residues managed as specified in 3745-279-10(E)? [3745-279-59] Yes ___ No ❑ N/A ___RMK#___

REMARKS

STANDARDS FOR USED OIL BURNERS WHO BURN OFF-SPEC USED OIL FOR ENERGY RECOVERY

42. Is off-spec used oil fuel burned for energy recovery only in industrial furnaces identified in 3745-50-10, or boilers as defined in 3745-50-10 and identified in 3745-279-61(A)(2), or hazardous waste incinerators? [3745-279-61(A)] — Yes ___ No ❑ N/A ___RMK#___

43. Does the used oil burner process used oil? [3745-279-61(B)] — Yes___No___ N/A ___RMK#___

If so, have they complied with the requirements for processors in 3745-279-50 to 3745-279-59? [3745-279-61(B)] — Yes ___ No ❑ N/A ___RMK#___

44. Has the used oil burner notified Ohio EPA or U.S. EPA and obtained an EPA ID#? [3745-279-62(A)] — Yes ___ No ❑ N/A ___RMK#___

45. Does the used oil burner determine whether the total halogen content of the used oil being managed at the facility is above or below 1000 ppm? [3745-279-63(A)] — Yes ___ No ❑ N/A ___RMK#___

46. Does the used oil burner retain records of all analyses conducted or information used to comply with 3745-279-63 for at least three years? [3745-279-63(D)] — Yes ___ No ❑ N/A ___RMK#___

47. Does the used oil burner:

a. Only store used oil in tanks, containers or units subject to regulation under 3745-54 to 3745-65 to 3745-69? [3745-279-64(A)] — Yes ___ No ❑ N/A ___RMK#___

b. Only stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-64(B)] — Yes ___ No ❑ N/A ___RMK#___

c. Provided secondary containment for containers as required by 3745-279-64(C)? [3745-279-64(C)] — Yes ___ No ❑ N/A ___RMK#___

d. Provided secondary containment for existing aboveground tanks as required by 3745-279-64(D)? — Yes ___ No ❑ N/A ___RMK#___

e. Provided secondary containment for new aboveground tanks as required by 3745-279-64(E)? — Yes ___ No ❑ N/A ___RMK#___

f. Labeled all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil?" [3745-279-64(F)] — Yes ___ No ❑ N/A ___RMK#___

g. Upon detection of a release of used oil, done the following in accordance with 3745-279-64(G):

i. Stopped the release? Yes ___ No ❑ N/A ___RMK#___

ii. Contained the release? Yes ___ No ❑ N/A ___RMK#___

iii. Cleaned up and managed the used oil and other materials? Yes ___ No ❑ N/A ___RMK#___

iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No ❑ N/A ___RMK#___

48. Does the used oil burner keep a record or each used oil shipment accepted for burning? [3745-279-65(A)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-65(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include the name and address of the generator or processor/re-refiner who sent the used oil to the burner? [3745-279-65(A)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include the EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-65(A)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include the EPA ID# (if applicable) of the generator or processor/re-refiner who sent the used oil to the burner? [3745-279-65(A)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Does each record include the quantity of the used oil accepted? [3745-279-65(A)(5)] Yes ___ No ❑ N/A ___RMK#___

f. Does each record include the date of acceptance? [3745-279-65(A)(6)] Yes ___ No ❑ N/A ___RMK#___

49. Are the records described in 3745-279-65(A) maintained for at least three years? [3745-279-65(B)] Yes ___ No ❑ N/A ___RMK#___

50. Prior to accepting the first shipment of off-spec used oil fuel from a generator, transporter, or processor/re-refiner, does the used oil fuel burner provide to the generator, transporter, or processor/re-refiner a one-time written and signed notice certifying that:

a. The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-279-66(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. The burner will burn the used oil only in an industrial furnace or boiler identified in 3745-279-61? Yes ___ No ❑ N/A ___RMK#___

51. Is the certification maintained for at least three years from the date the burner last received a shipment of off-spec used oil from the generator, transporter, or processor/re-refiner? [3745-279-66(B)] Yes ___ No ❑ N/A ___RMK#___

52. Does the used oil burner generate residues from the storage or burning of used oil? [3745-279-67] Yes___No___ N/A ___RMK#___

If so, are the residues managed as specified in 3745-279-10(E)? [3745-279-67] Yes ___ No ❑ N/A ___RMK#___

REMARKS

STANDARDS FOR USED OIL MARKETERS

53. Does the used oil fuel marketer initiate shipments of off-spec used oil only to a used oil burner that has an EPA ID# and burns the used oil in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-71]
Yes ☒ No ☐ N/A ___ RMK# 1

54. Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil meets the specification for used oil fuel under 3745-279-11 keep copies of analyses of the used oil (or other information used to make the determination) for at least three years? [3745-279-72(B)]
Yes ☒ No ☐ N/A ___ RMK#___

55. Has the used oil marketer notified Ohio EPA or U.S. EPA and obtained an EPA ID#? [3745-279-73(A)]
Yes ☒ No ☐ N/A ___ RMK#___

56. Does the used oil marketer keep a record of each shipment of used oil directed to a used oil burner? [3745-279-74(A)]
Yes ☒ No ☐ N/A ___ RMK#___

a. Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-74(A)(1)]
Yes ☒ No ☐ N/A ___ RMK#___

b. Does each record include the name and address of the burner who receives the oil? [3745-279-74(A)(2)]
Yes ☒ No ☐ N/A ___ RMK#___

c. Does each record include the EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-74(A)(3)]
Yes ☒ No ☐ N/A ___ RMK#___

d. Does each record include the EPA ID# of the burner? [3745-279-74(A)(4)]
Yes ☒ No ☐ N/A ___ RMK#___

e. Does each record include the quantity of the used oil shipped? [3745-279-74(A)(5)]
Yes ☒ No ☐ N/A ___ RMK#___

f. Does each record include the date of shipment? [3745-279-74(A)(6)]
Yes ☒ No ☐ N/A ___ RMK#___

57. Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil meets the fuel specifications under 3745-279-11 keep a record of each shipment of used oil to an on-spec used oil burner? [3745-279-74(A)(6)]
Yes ☒ No ☐ N/A ___ RMK#___

a. Does each record include the name and address of the facility receiving the shipment? [3745-279-74(B)(1)]
Yes ☒ No ☐ N/A ___ RMK#___

b. Does each record include quantity of used oil fuel delivered? [3745-279-74(B)(2)] Yes X No ☐ N/A ___RMK#___

c. Does each record include date of shipment or delivery? [3745-279-74(B)(3)] Yes X No ☐ N/A ___RMK#___

d. Does each record include a cross-reference to the record of used oil analysis or other information used to make the determination that the used oil meets the specification as required in 3745-279-72(A)? [3745-279-74(B)(4)] Yes X No ☐ N/A ___RMK#___

58. Are the records described in 3745-279-74(A) and (B) maintained for at least three years? [3745-279-74(C)] Yes X No ☐ N/A ___RMK#___

59. Before the used oil generator, transporter or processor/re-refiner directs the first shipment of off-spec used oil to a burner, does he obtain a one time written and signed notice from the burner certifying that:

a. The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-279-75(A)(1)] Yes X No ☐ N/A ___RMK#___

b. The burner will burn the off-spec used oil only in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-75(A)(2)] Yes X No ☐ N/A ___RMK#___

60. Is the certification maintained for at least three years from the date the last shipment of off-spec used oil was shipped to the burner? [3745-279-75(B)] Yes X No ☐ N/A ___RMK#___

E:\USDOEPortsmouthChecklists\USDOEusedoil.wpd

REMARKS

(1) used oil from DOE is picked up by USEC, and then sent DEC-3 etc.

U.S. EPA REGION 5
WASTE, PESTICIDES AND TOXICS DIVISION
ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME:	**U.S. DOE Portsmouth Gaseous Diffusion Plant**
FACILITY U.S. EPA ID NO.:	**OH7 890 008 983**
FACILITY TYPE:	**Large Quantity Generator/Permitted Storage Facility**
FACILITY ADDRESS:	3930 US Route 23 South Piketon, Ohio 45661
FACILITY REPRESENTATIVE:	Melda Rafferty, Project Manager Chris Guilliams, Environmental Compliance Greg Utrecht, Waste Disposition Engineer
OEPA REPRESENTATIVE:	Melody Stewart Hazardous Waste Inspector Ohio Environmental Protection Agency Southeast District Office 2195 Front Street Logan, Ohio 43138 (740) 380-5256 Melody.Stewart@epa.state.oh.us
U.S. EPA REPRESENTATIVE:	Walt Francis Environmental Scientist U.S. EPA, Region 5 Waste, Pesticides and Toxics Division Enforcement and Compliance Assurance Branch Compliance Section 2 (312) 353-4921 Francis.Walt@epa.gov
DATE(S) OF INSPECTION:	March 8th and 9th, 2005
SIC CODE:	**2819** - Industrial Inorganic Chemicals, Not Elsewhere Classified
NAICS CODE:	**562998** - All other miscellaneous waste management services

PROCESS DESCRIPTION

Historically, the main function of the U.S. DOE-Portsmouth (Portsmouth) facility was to enrich uranium for military use (nuclear submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in uranium hexafluoride (UF6) feedstock which contains 0.711% U235. The Plant had produced enriched uranium continuously since September 1954. In 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). U.S. DOE retained ownership of the ongoing site environmental restoration program as well as two permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and are leased by USEC. These include decontamination of equipment and uranium recovery (X-705 Bldg.); chemical cleaning of equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); photo and printing lab (X-100); vehicle repair (X-750); coal pile runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in U.S. DOE owned and permitted storage facilities. Waste generated by U.S. DOE and Bechtel Jacobs from the environmental restoration is also stored in these facilities. USEC ceased the enrichment process in May 2001.

WASTE MANAGEMENT, GENERATION AND AMOUNT

Uranium contaminated hazardous wastes (mixed waste) which were/are generated by USEC and U.S. DOE are stored on-site in U.S. DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of TSDs in the U.S. which could accept mixed waste, and a May 1991 U.S. DOE moratorium on off-site waste shipment. A large percentage of the waste generated at Portsmouth is U.S. DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in U.S. DOE-owned storage areas. During the past year, numerous shipments of hazardous waste were manifested off-site by both U.S. DOE and USEC. This is due to an increase in treatment capacity at off-site commercial treatment facilities and U.S. DOE treatment facilities, the lifting of the moratorium, and the execution of the site treatment plans for U.S. DOE and USEC. U.S. DOE sends some waste off-site (to U.S. DOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to U.S. DOE - Porstsmouth for storage in the interim prior to their final disposal.

USEC generated hazardous wastes are shipped to Permafix in Florida. In addition, a wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes.

INSPECTION:
U.S. EPA representative Walt Francis and OEPA representative, Melody Stewart arrived at the facility at approximately 7:50 am. The inspectors met Ms. Melda Rafferty from U.S. DOE. The inspection team and Ms. Rafferty then went to a U.S. DOE conference room in Building X-1000 and informed the U.S. DOE and Bechtel Jacobs representatives of the nature, scope, and procedures of the inspection. The inspection was conducted by OEPA and U.S. EPA personnel as a Federal lead inspection. The inspection was conducted to determine the facility's compliance under the Resource, Conservation and Recovery Act (RCRA) and the Ohio Administrative Code (OAC). The facility representatives provided the team with a brief update on activities at the facility. The on-site U.S. DOE personnel allowed the inspectors access to the facility to conduct the inspection.

WALK THROUGH:
The walkthrough began at the X-735A Landfill Service Garage. Inspector Stewart asked about the floor drains. U.S. DOE personnel said that they drain into a ditch outside. We then toured Building X-624 where the inspectors observed a 55-gallon container of F001 PPE and filters and a 55-gallon container of waste TCE. We then toured the SAA in Building X-622 which contained a 55-gallon container of F001 plastic, PPE and filters. We next toured Building X-752 where we observed a 55-gallon container of scrap metal, then on to Building X-747H where we observed a 55-gallon container of used aerosol cans. Also, the inspectors observed a 55-gallon container of used oil and two lead acid batteries outside of Building X-747H. Inspector Stewart asked to see the Contractor Lay Down Area where she had noticed a 55-gallon container and several 5-gallon containers stored outside. The 55-gallon container was labeled "Kure-N-Seal" and the 5-gallon containers were labeled "Coat Supreme Form Release". U.S. DOE personnel said that they would look into why these materials were stored in this area. We then went over to Building X-623 to inspect a less than 90 day area and a SAA. The inspectors observed one 55-gallon container of F001 with a date 12/27/04 and one 55-gallon container of F001 "Neat TCE" with a date of 2/25/05. We then went over to the X-744G Building to observe the T-Hoppers. No change in the T-Hoppers since U.S. EPA's last inspection in August 2004. In Building X-345 we observed small cylinders of UF6. In Building X-627 the inspectors observed one 55-gallon container of Waste TCE which was labeled F001 Filters and PPE. We then went over to Building X-700 where the inspectors observed four 5-gallon containers of used aerosol cans and three 10-gallon containers of waste paint and solvents. We also toured Building X-326 L cage Permitted storage area. Next stop was an SAA DMSA #1 in Building X-326. Then we went on to Buildings X-330 SAA L71, and X-333, SAA UX48, DMSA #13.

The walkthrough continued at Building X-7725 to inspect the permitted storage areas, with Mr. Charlie Bearhs. We inspected Areas C, P-1, P, J, K, G, B, H, D, and the used fluorescent lamp accumulation area. The inspectors wrote down Request for Disposal (RFD) numbers to have U.S. DOE and Bechtel Jacobs pull the waste profiles. The inspectors then went out with U.S. DOE personnel to the South Slurry Wall lock-up area, where the inspectors observed eight 55-gallon containers of contaminated soils from groundwater monitoring well installation, the containers were labeled as Non-Regulated.

RECORDS REVIEW:
The inspectors conducted a records review. The inspection team requested and reviewed hazardous waste manifests, land disposal restriction forms, mixed-waste shipment documentation, universal waste shipping records, personnel training information, weekly inspection logs, RFD waste profiles and the latest contingency plan. The inspectors reviewed hazardous waste manifests since the date of the last inspection. Personnel training records were also reviewed. The inspectors reviewed the latest Contingency Plan. Also, inspector Francis reviewed the requirements of RCRA Section 6002, i.e., the procuring recycled content products requirement for Federal Facilities.

CLOSING CONFERENCE:
The inspectors conducted a closing conference. Inspector Francis told the facility that they would receive a letter from U.S. EPA regarding the inspection. At this closing conference, U.S. DOE and Bechtel Jacobs staff agreed to resolve U.S. EPA's and OEPA's question regarding the SAA sodium permanganate issue, Uranium T-Hoppers outside of Building X744G, and two 55-gallon containers from a 1/26/05 diesel fuel spill that were located in Building X-700. U.S. DOE personnel told the inspectors that the containers in the Contractor lay down area had been removed. Inspector Stewart discussed the problem with the Envirocare LDR forms. Specifically, that the forms did not have a wastewater/non-wasetewater box to check. Ms. Rafferty agreed to follow-up on the RCRA 6002 information.

ATTACHMENTS:

Inspection Checklists.

RCRA HAZARDOUS WASTE GENERATOR INSPECTION CHECKLIST

Company: U.S. Department of Energy - Portsmouth Gaseous Diffusion Plant EPA ID#: OH7 890 008 983

Street: 3930 US Route 23 South City: Piketon

County: Pike State: Ohio Zip: 45661

Mailing Address: PO Box 700, Piketon, Ohio 45661-0700

(If different from above)

Telephone: 740-897-5010 Fax #:

Owner/ Operator: Federal Government/Co-Operator Bechtel Jacobs Company LLC
(If different from above)

Street:

City: State: Ohio Zip:

Inspection Date(s): 3/7/2005 - 3/9/2005 Time(s): 8:00 am -

Inspection Announced? _____ Yes ___X___ NO If so, how much advance notice given?

	Name	Affiliation	Telephone
Inspectors:	Melody Stewart	OEPA	740-380-5256
	Walt Francis	U.S. EPA	312-353-4921
Facility Representative:	~~Cliff Beeks~~ Melda Mccoy	~~BJC~~ U.S. DOE	~~740-897-3579~~
	~~Mary Williams~~ Chris Williams	~~BJC~~	~~740-897-5010~~
	Rosemary Richmond	BJC	740-897-2967
	~~Sandy Childers~~ Greg Threatt	~~BJC~~	~~740-897-2336~~

Complete All Other Applicable Checklists

Generator Classification	Waste Management Activity
_____ Conditionally Exempt SQG (CESQG)	___X___ Containers
_____ Small Quantity Generator (SQG)	_____ Tank(s)
___X___ Large Quantity Generator (LQG)	_____ Land Disposal Requirements (LDR)
_____ No Generation	_____ Used Oil
	___X___ Universal Waste
	_____ Other

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

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

PROCESS DESCRIPTION

Historically, the main function of the DOE-PORTS facility was to enrich uranium for military use (nuclea submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in UF6 feedstock which contains 0.711% U235. However, in 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). USDOE retained ownership of the ongoing site environmental restoration program as well as two permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and are leased by USEC. These include decontamination of equipment and uranium recovery (X-705 Bldg.); chemical cleaning of equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); photo and printing lab (X-100); vehicle repair (X-750); coal pile runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in DOE owned and permitted storage facilities. Waste generated by DOE from the environmental restoration is also stored in these facilities. USEC ceased the enrichment process in May 2001.

WASTE MANAGEMENT, GENERATION AND AMOUNT

Uranium contaminated hazardous wastes (mixed waste) which were/are generated by USEC and DOE are stored on-site in DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of TSDs in the U.S. which could accept mixed waste, and a May 1991 DOE moratorium on off-site waste shipment. A large percentage of the waste generated at PORTS is DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in DOE-owned storage areas. During the past year, numerous shipments of hazardous waste were manifested off-site by both DOE and USEC. This is due to an increase in treatment capacity at off-site commercial treatment facilities and DOE treatment facilities, the lifting of the moratorium, and the execution of the site treatment plans for DOE and USEC. DOE sends some waste off-site (to U.S. DOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to DOE for storage in the interim prior to their final disposal.

Hazardous

The DOE Part B permit lists numerous hazardous waste codes for wastes that are generated by the above processes and the environmental restoration. These are stored in drums ranging in size from 30 to 110 gallon capacity, 5 gallon containers, 20 gallon lab packs, 5' cans, 4'x4'x6' boxes, 4'x4'x8' boxes, polybottles and laboratory bottles.

Nonhazardous

A wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes.

HAZARDOUS WASTE MANAGEMENT UNITS

The following DOE-owned permitted storage facilities were inspected during the CEI:

✓ -X-7725 Container Storage Facility
✓ -X-326 Container Storage Facility

In addition, DOE-owned and operated HWMUs and SAAs were inspected in the following buildings:

-X-326 ✓ -X-622 ✓
-X-7725 ✓ -X-624
-X-623 ✓ ~~X-3012~~
-X-333 ✓ -X-330 ✓
~~X-622T~~ -X-747H
~~X-3346~~
- X-7725 X-326, X-333, X-623, X-300
Other Areas - X-744G Uranium Management Center

REGULATORY/ENFORCEMENT HISTORY

As a result of violations of state and federal hazardous waste regulations found during the 1987, 1988, and 1989 OEPA RCRA inspections, USDOE and OEPA entered into a Consent Decree governing restoration of the environment at DOE-PORTS. This decree includes a requirement that DOE close the X-701B, X-749, X-231B, and X-616 units within specific timeframes. The X-749, X-616 and X-231B units have now been closed. X-701B is yet to be closed.

On October 4, 1995, DFFOs were signed which allowed DOE to store LDR wastes in excess of one year, so long as waste is being stored in compliance with the orders and an approved site treatment plan. These orders supercede the May 18, 1993, DFFOs.

On February 24, 1998, DOE, LMES and Ohio signed DFFOs and a Consent Order regarding past violations and the management of DUF6 and LiOH.

On March 18, 1999, DOE and Ohio EPA signed DFFOs. These DFFOs provide exemptions to DOE and integrate the following unclosed units into the CMS/CMI process: X-749, X-231B, X-701C, X701B, X-230J7, and X-744Y.

A RCRA Permit was issued to DOE and its current co-operator, Bechtel Jacobs, for the X-7725 and X-326 storage facilities on March 15, 2001.

POLLUTION PREVENTION

Note to the Inspector: This checklist has been developed to help the division in gathering general information about the pollution prevention (P2) practices that the company may have initiated or attempted to initiate. The checklist is also used to:

- Facilitate P2 discussions;
- Identify barriers to P2;
- Define the P2 universe;
- Identify the need for future P2 initiatives;
- Identify partnership opportunities; and
- Link companies with better P2 resources.

As a prelude to completing this checklist the inspector should use the following list of questions as a way to initiate a dialogue concerning P2:

1. Have you tried to reduce the volume of waste (hazardous and nonhazardous) that you generate?

2. What is the largest waste stream that you generate?

3. How important would it be to you to eliminate that waste stream?

4. Does your company understand the reduced regulatory burden and cost saving benefits that eliminating or reducing a waste stream can have?

5. Could you use better housekeeping practices to reduce the amount of waste that you generate?

If the company responds with one of the answers below, the appropriate box should be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided or in the remarks section.

1. Has the company undertaken any P2 activities to reduce the amount of hazardous waste generated? Yes ___ No___N/A ___RMK#___

   a. ***If so,*** what has the company done to minimize hazardous waste generation?

   - ❑ A change in the process resulting in less waste.
   - ❑ A change in the product resulting in less waste.
   - ❑ Use of fewer and less toxic hazardous raw materials.
   - ❑ Better operations/improved housekeeping.
   - ❑ On-site recycling/reuse of hazardous materials.
   - ☒ Sending waste off-site for recycling/reuse.
   - ❑ Other activities (specify): _____

   b. ***If so,*** what hazardous wastes have been addressed?

   - ❑ Solvents
   - ❑ Paint related wastes

- ❑ Industrial process wastes (sludges, slags, contaminated waste waters, etc)
- ❑ Contaminated oils/hydraulic fluids
- ❑ Off-spec chemicals
- ☒ Fluorescent light bulbs
- ☒ Used batteries
- ❑ Shop rags
- ❑ Other (specify): _____

c. ***If not,*** why hasn't the company considered P2?

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

2. Does the company plan to do P2 activities in the future? Yes X No ___ N/A ___RMK#___

3. Would the company be interested in receiving additional information from Ohio EPA about P2? Yes X No___ N/A ___RMK#___

4. Did you give the company information about P2 during the inspection? Yes X No___ N/A ___RMK#___

5. Would the company like a P2 assessment? Yes___ No X N/A ___RMK#___

If the company would like a P2 assessment done at their facility, the inspector must give the company representative a copy of the Pollution Prevention Assessments for Hazardous Waste Generators document and discuss it with them.

6. If the company does not want a P2 assessment, why not? Company has program in place.

REMARKS

LARGE QUANTITY GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] — Yes X No ☐ N/A ___ RMK#___

2. Has the generator obtained an identification number? [3745-52-12] — Yes X No ☐ N/A ___ RMK#___

3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41] — Yes X No ☐ N/A ___ RMK#___

WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? If so: — Yes___ No X N/A ___ RMK#___

   a. Has the generator notified U.S. EPA of export/import activity? [3745-52-53] — Yes ___ No ☐ N/A X RMK#___

   b. Has the generator complied with special manifest requirements? [3745-52-54] — Yes ___ No ☐ N/A X RMK#___

   c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] — Yes ___ No ☐ N/A X RMK#___

   d. Has an annual report been submitted to U.S. EPA? [3745-52-56] — Yes ___ No ☐ N/A X RMK#___

   e. Are export related documents being maintained on-site? [3745-52-57] — Yes ___ No ☐ N/A X RMK#___

GENERATOR CLOSURE REQUIREMENTS

5. Has the generator closed any <90-day accumulation unit(s) since the date of the last inspection? If so: — Yes___ No X N/A ___ RMK#___

   a. Describe the unit(s) which the generator has closed.
   X-7725 Areas A, M, M1, P3, 4C, 4B, 4E

   b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] — Yes ___ No ☐ N/A X RMK#___

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

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

REMARKS

MANIFEST REQUIREMENTS

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

Are you aware of what the statement that you sign on the manifest says? Yes X No___

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

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

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

2. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] — Yes X No ❑ N/A ___RMK#___

NOTE: ***U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]***

3. Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)] — Yes X No ❑ N/A ___RMK#___

NOTE: ***The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]***.

4. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: — Yes___ No X N/A ___RMK#___

   a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] — Yes ___ No ❑ N/A X RMK#___

5. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)] — Yes X No ❑ N/A ___RMK#___

6. Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not: — Yes X No___ N/A ___RMK#___

   a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)] — Yes ___ No ❑ N/A X RMK#___

b. If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]

Yes ___ No ☐ N/A X RMK#___

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

Yes X No ☐ N/A ___RMK#___

REMARKS

PERSONNEL TRAINING

1. Does the generator keep records required by 3745-65-16(D) including:

   a. Job titles, as they relate to hazardous waste management, and the name of each employee filling each job? — Yes ✓ No ☐ N/A ___ RMK#___

   b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position? — Yes X No ☐ N/A ___ RMK#___

   c. Type and amount of both introductory and continuing training to be given to each person filling a position? — Yes X No ☐ N/A ___ RMK#___

   d. Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)? — Yes X No ☐ N/A ___ RMK#___

NOTE: ***If the facility's business practices precludes written job titles/descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be used to document that all necessary employees have been trained.***

2. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to their positions? [3745-65-16(A)(2) — Yes X No ☐ N/A ___ RMK#___

3. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]

   a. Emergency procedures? — Yes X No ☐ N/A ___ RMK#___

   b. Emergency equipment? — Yes X No ☐ N/A ___ RMK#___

   c. Emergency systems? — Yes X No ☐ N/A ___ RMK#___

4. Does emergency training described in 3(a), (b) and (c) above include, *where applicable*: [3745-65-16(A)(3)(a-f)

   a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? — Yes X No ☐ N/A ___ RMK#___

b. Key parameters for automatic waste feed cut-off systems? Yes X No ☐ N/A ___RMK#___

c. Communication or alarm system? Yes X No ☐ N/A ___RMK#___

d. Response procedures for fire/explosions? Yes X No ☐ N/A ___RMK#___

e. Response to groundwater contamination incidents? Yes X No ☐ N/A ___RMK#___

f. Shutdown procedures? Yes X No ☐ N/A ___RMK#___

5. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes X No ☐ N/A ___RMK#___

6. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes X No ☐ N/A ___RMK#___

7. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes X No ☐ N/A ___RMK#___

8. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)] Yes X No ☐ N/A ___RMK#___

9. Are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes X No ☐ N/A ___RMK#___

10. ***Optional***: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifests, etc.

Job Performed	Name of Employee	Date(s)Trained
	Greg Utrecht	
Waste Handler	J. Cowen	Eloy
	Jeremy Davis	
	Ross Cassely	

REMARKS

CONTINGENCY PLAN

1. Does the generator have a contingency plan which describes the following: [3745-65-52(A) through (F)]

   a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? — Yes X No ☐ N/A ___ RMK#___

   b. Arrangements/agreements with emergency authorities? [3745-65-37] — Yes X No ☐ N/A ___ RMK#___

   c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? — Yes X No ☐ N/A ___ RMK#___

   d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? — Yes X No ☐ N/A ___ RMK#___

   e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary? — Yes X No ☐ N/A ___ RMK#___

NOTE: ***If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]***

2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] — Yes X No ☐ N/A ___ RMK#___

3. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)(B)] — Yes X No ☐ N/A ___ RMK#___

4. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] — Yes X No ☐ N/A ___ RMK#___

EMERGENCY COORDINATOR

5. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] — Yes X No ☐ N/A ___ RMK#___

NOTE: ***The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan***

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes___ No_X_ N/A ___RMK#___

   a. Was the contingency plan implemented? [3745-65-51(B)] Yes ___ No ☐ N/A _X_ RMK#___

   b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes ___ No ☐ N/A _X_ RMK#___

   c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes ___ No ☐ N/A _X_ RMK#___

NOTE: ***OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.***

REMARKS

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

1. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] — Yes ☑ No ☐ N/A ___ RMK#___

2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]

   a. Internal alarm system? — Yes ☑ No ☐ N/A ___ RMK#___

   b. Emergency communication device? — Yes ☑ No ☐ N/A ___ RMK#___

   c. Portable fire control, spill control and decon equipment? — Yes ☑ No ☐ N/A ___ RMK#___

   d. Water of adequate volume/pressure? — Yes ☑ No ☐ N/A ___ RMK#___

3. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] — Yes ☑ No ☐ N/A ___ RMK#___

4. Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33] — Yes ☑ No ☐ N/A ___ RMK#___

5. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32)*? [3745-65-34] — Yes ☑ No ☐ N/A ___ RMK#___

6. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] — Yes ☑ No ☐ N/A ___ RMK#___

7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] — Yes ☑ No ☐ N/A ___ RMK#___

   a. Where authorities have declined to enter into arrangements/agreements, has the generator documented such a refusal? [3745-65-37(B)] — Yes ___ No ☐ N/A ☑ RMK#___

REMARKS

GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)] — Yes ☐ No ✓ N/A ___ RMK#___

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

2. Does the generator ensure that satellite accumulation area(s):

   a. Are at or near a point of generation? — Yes ✓ No ☐ N/A ___ RMK#___

   b. Are under the control of the operator of the process generating the waste? — Yes ✓ No ☐ N/A ___ RMK#___

   c. Do not exceed a total of 55 gallons of hazardous waste? — Yes ✓ No___ N/A ___ RMK#___

   d Do not exceed one quart of acutely hazardous waste at any one time? — Yes ✓ No ☐ N/A ___ RMK#___

   e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? — Yes ✓ No ☐ N/A ___ RMK#___

IOTE: The 55 gallon limit applies to the area itself, and not to each individual waste stream accumulated in the area. The inspector should refer to Ohio EPA's November 1994 Guidance on the Location of Satellite Accumulation Areas.

3. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so: — Yes___ No ✓ N/A ___ RMK#___

   a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? — Yes ___ No ☐ N/A ✓ RMK#___

   b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? — Yes ___ No ☐ N/A ✓ RMK#___

USE AND MANAGEMENT OF CONTAINERS

4. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] — Yes ✓ No ☐ N/A ___ RMK#___

5. Is the accumulation date on each container? [3745-52-34(A)(2)] — Yes X No ☐ N/A ___ RMK#___

6. Are hazardous wastes stored in containers which are:

   a. Closed (except when adding/removing wastes)? [3745-66-73(A)] — Yes X No ☐ N/A ___ RMK#___

   b. In good condition? [3745-66-71] — Yes X No ☐ N/A ___ RMK#___

   c. Compatible with wastes stored in them? [3745-66-72] — Yes X No ☐ N/A ___ RMK#___

   d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] — Yes X No ☐ N/A ___ RMK#___

7. Is the container accumulation area(s) inspected weekly? [3745-66-74] (*Note location in general information section of checklist)* — Yes X No ☐ N/A ___ RMK#___

   a. Are inspections recorded in a log or summary? [3745-66-74] — Yes X No ☐ N/A ___ RMK#___

8. For ignitable and/or reactive hazardous waste(s):

   a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] — Yes X No ☐ N/A ___ RMK#___

   b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] — Yes X No ☐ N/A ___ RMK#___

PRE-TRANSPORT REQUIREMENTS

9. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] — Yes X No ☐ N/A ___ RMK#___

10. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] — Yes X No ☐ N/A ___ RMK#___

11. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] — Yes X No ☐ N/A ___ RMK#___

E:\USDOEPortsmouthChecklists\USDOEPortsLQG2004.wpd

REMARKS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 15 2005

REPLY TO THE ATTENTION OF DE-9J

Mr. William E. Murphie
Manager
U.S. Department of Energy
Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

Mr. John Meersman
Manager of Projects
Bechtel Jacobs Company LLC
P.O. Box 900
Piketon, Ohio 45661

Re: Letter of Acknowledgment
RCRA Compliance Evaluation Inspection
U.S. Department of Energy - Gaseous Diffusion Plant
Piketon, Ohio
OH7 890 008 983

Dear Messrs. Murphie and Meersman:

On November 15, 2004, the United States Environmental Protection Agency (U.S. EPA) issued U.S. Department of Energy Portsmouth Gaseous Diffusion Plant a Notice of Violation (NOV) which identified a violation of the Ohio Administrative Code and a Resource Conservation and Recovery Act (RCRA) Permit violation at the Piketon, Ohio facility.

U.S. EPA received your December 13, 2004, responses to the November 15, 2004, NOV.

This letter is to inform you that U.S. EPA has reviewed your responses and determined that additional enforcement action need not be taken at this time.

It is our understanding, that in the future when declaring a chemical product a RCRA hazardous waste that U.S. DOE and Bechtel Jacobs personnel will create a less than 90 day accumulation area or transfer the material to Building X-7725 for storage.

This position does not limit your liability for compliance with all the applicable provisions of the Resource Conservation and Recovery Act, as amended. Your hazardous waste management operations will continue to be evaluated by U.S. EPA and the Ohio Environmental Protection Agency (OEPA) in the future.

Recycled/Recyclable . Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

If you have any questions regarding this letter, please contact Walt Francis of my staff at (312) 353-4921.

Sincerely yours,

Paul Little, Chief
Compliance Section #2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

cc: Melody Stewart, OEPA-Southeast District Office

OH7 890 008 913

Department of Energy

Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513
(859) 219-4000

DEC 13 2004

Walt Francis
Enforcement and Compliance Assurance Branch
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency
Region V
77 West Jackson Boulevard, DE-9J
Chicago, Illinois 60604

PPPO-01-255-05

Dear Mr. Francis:

RE: 2004 RCRA COMPLIANCE INSPECTION

The purpose of this letter is to respond to the Environmental Protection Agency's (EPA) letter titled, "Notice of Violation, RCRA Compliance Inspection," which the Department of Energy (DOE) and Bechtel Jacobs Company LLC (BJC) received on November 15, 2004. The EPA letter reports EPA's findings resulting from its Resource Conservation and Recovery Act (RCRA) compliance inspection conducted at the Portsmouth Gaseous Diffusion Plant (PORTS) on August 9 and 10, 2004. The EPA letter also requests information associated with materials stored at the PORTS Uranium Management Center. The following information is provided in response to the alleged violations and information request set forth in EPA's letter.

Alleged Violations

DOE and its contractor, BJC, have reviewed the two alleged violations based on EPA's compliance inspection. Each of the allegations (in italics) and DOE's corresponding response are set forth below:

1. Allegation: *"During the inspection of Building X-3346, the inspectors observed a 55-gallon satellite accumulation (SAA) container that was dated 6/18/04. The waste material was identified by Bechtel Jacobs personnel as a 40% solution of Liquox and a 40% solution of potassium permanganate, with an RFD# 3957and a D001 hazardous waste code. Bechtel Jacobs personnel stated that the material was used in Building X-701B. The SAA container of hazardous waste that the inspectors observed in Building X-3346 was not at or near the point of generation or under the control of the operator and should have been designated a less than 90 day container accumulation area. It is our understanding that the container that was observed in Building X-3346 has been transferred to X-7725 for storage. Therefore, U.S. DOE failed to comply with OAC Rule 3745-52-34(C)(1) [40 C.F.R. 262.34(c)(1)], and was therefore required to comply with the requirements of OAC Rule 3745-52-34(A) [40 C.F.R. 262.34(a)]."*

   Response: By way of background, sodium permanganate (incorrectly noted in EPA's letter as potassium permanganate) is a product with the brand name Liquox. The sodium

permanganate at issue was used in the lance permeation technology demonstration project. As part of the demonstration project, the sodium permanganate was injected into the ground to provide in-situ treatment of Dense Nonaqueous Phase Liquids (primarily Trichloroethene) associated with the X-701B groundwater plume. The sodium permanganate was used in an open field in the area of the X-701B groundwater plume; it was not used in Building X-701B, as alleged (there is no such building). The demonstration project was terminated earlier than anticipated, in 2000, due to an accident. The remaining, unused sodium permanganate product was moved from the open field along with other equipment, materials, and chemicals to the X-3346 Building when the remediation project was terminated. BJC and DOE exhausted all efforts to find a use for the unused sodium permanganate product prior to declaring it a waste. When no use for the product could be found, the product was declared a waste on 6/18/04 (RFD # 55872-1), and a SAA was established in the X-3346 Building where the product was stored. The waste consisted solely of the unused sodium permanganate and was not a mixture of 40% Liquox and 40% potassium permanganate as alleged. The X-3346 Building is a locked facility that is under the control of the BJC Facility Manager. On August 10, 2004, the sodium permanganate waste was transferred to a 5-gallon container, and transported to the X-7725 RCRA permitted storage unit at PORTS.

The alleged violation appears to be based on two EPA findings: that the sodium permanganate waste was not being stored at or near the point of generation and that the storage building was not under the control of the operator. Contrary to these findings, as explained above, the sodium permanganate waste was being stored at or near the point of generation—i.e., the building where it was stored when it was declared a waste. The waste was also under the control of the operator, namely BJC.

2. Allegation: *"During the inspection of Building X-326 L Cage, the inspectors observed several instances where containers were stored in such a way that they could not be seen during inspections. Some of the containers were below the metal stand such that you could not see the actual container. The inspector asked if the container was lifted up for visual inspection during the weekly inspections. U.S. DOE personnel said no, that the Material Handlers Group was responsible for labeling and may lift the container out of the metal stand. This is a violation of the inspection requirements set forth in the U.S. DOE-Portsmouth RCRA Permit because the permit requires that each container itself be inspected for integrity."*

   Response: The containers at issue, 5-inch diameter cans, hold mixed waste with high levels of radioactivity that pose a risk of nuclear criticality. In order to avoid a criticality event, such waste must be managed in accordance with Nuclear Criticality Safety (NCS) requirements, including exacting spacing requirements. A criticality event is a nuclear reaction that occurs if a critical mass of radioactive material is brought together. The waste cans at issue are stored in fixed, metal stands in order to meet the requisite NCS spacing requirements. The cans currently in storage have been packaged in 4 mil plastic bags prior to being placed into the stands. The metal stands are in the shape of a hollow tube, which are open at the top and bottom. Each waste package slides down into the metal tube, leaving approximately a ¼ inch space between the side of the can and the

inside wall of the tube. The bottom of the cans and the bottom of the holders are situated approximately ¼ inch above the floor. Storage of the cans in the metal holders has the added benefit of providing shielding for the high levels of radioactivity associated with the cans, thereby reducing radiation doses to potentially affected workers.

The RCRA Part B Permit states that weekly inspections of container integrity will be conducted, looking for the following: corrosion, leaks, bulges, missing bungs, and dents, which jeopardize structural integrity. The inspections for the cans at issue meet these requirements. The cans stored in the metal stands are individually inspected on a weekly basis. The inspector shines a flashlight into each metal stand and observes the top of the cans. The inspector also looks at the floor near the ¼ inch gap at the bottom of the cans for any evidence of leakage or corrosion products. These inspections will reveal defects in the cans' integrity as required by the permit. Based on experience, corrosion on these cans occurs, if at all, on the top of the cans. Any such corrosion would be visible from viewing the top of the cans. In addition, corrosion products or leaks from the waste package would be visible by the inspection of the ¼ inch gap at the bottom of the cans. Bulges and dents would be detected from views from the top of the cans. (Missing bungs are not an issue with the cans.) A view of the metal holders would also inform the inspector of whether there are dents on the cans inside the holders. (Because the cans routinely remain inside the holders, outside forces that would dent the cans would also impact the holders.)

The storage configuration and inspection procedures for the cans at issue are based on DOE's Atomic Energy Act (AEA) requirements, including 10 CFR Part 835, which mandate that doses to workers be As Low As Reasonably Achievable (ALARA). These AEA requirements constrain the available means for inspecting the subject cans. DOE and BJC have considered changing the inspection procedures to have individuals lift every can out of its metal stand for purposes of inspection. However, doing so would increase the annual radiation dose to such individuals and increase NCS risks in the event the waste container is mishandled. The current configuration and inspection procedure allows DOE to both meet its obligations under the AEA and comply with the RCRA permit.

The interplay between AEA and RCRA compliance has been discussed in a variety of regulatory documents. The following information is set forth in 1995 guidance (draft) issued by EPA and NRC (www.epa.gov/radiation/mixed-waste/mw_pg27.htm) under the heading, "Inspection/Surveillance Requirements for Stored Mixed Waste:"

- "Under RCRA, waste storage containers must be inspected on a weekly basis (40 CFR 264.174) and certain above-ground portions of waste storage tanks on a daily basis (40 CFR 264.195(b)(1)). The purpose of these inspections is to detect leakage from or deterioration of containers. NRC recommends that waste in storage be inspected on at least a quarterly basis. Licensees have expressed concerns that daily or weekly "walk-through" inspections of high activity mixed waste may result in

increased exposures to workers at their facilities and thus violate their As Low as Reasonably Achievable (ALARA) programs."

- "The RCRA regulations and permit guidance do not require that inspections of mixed waste in storage must be "walk-through" inspections. NRC and EPA recognize that increased exposures to workers may result from daily or weekly "walk through" inspections and suggest that licensees consider using methods other than walk-through inspections as a means to inspect high-activity mixed waste in storage. Alternative methods for inspection could include the use of remote monitoring devices to determine if a waste container is leaking or television monitors, or other means that are capable of detecting leakage or deterioration. Such alternative methods would comply with the RCRA regulation and would avoid the additional exposures of walk-through inspections. However, these measures should be coupled with a means to promptly locate and segregate or remediate leaking containers."

Additionally, the 1989 Ohio Consent Decree, issued by a Federal District Court, states in Section V, HAZARDOUS WASTE REQUIREMENTS:

"5.1 USDOE shall conduct its current and future treatment, storage, and disposal of all hazardous and mixed waste at PORTS in accordance with Federal and Ohio hazardous waste laws and hazardous waste regulations, including but not limited to the permit requirements of these laws and requirements. However, USDOE is not required to comply with the above requirements, with regard to mixed waste, where compliance will increase the risk to human safety and health or the environment, or, with respect to hazardous or mixed waste, where the requirements would be inapplicable due to the restrictions of 42 U.S.C. 6905(a).

See also RCRA Section 1006(a), 42 USC Section 6905(a) ("Application of chapter and integration with other Acts"). The 1989 Ohio Consent Decree remains in effect at PORTS.

The current inspection procedure for the mixed waste cans at issue is appropriate and consistent with applicable law.

Requested Information

In addition to reporting the findings from EPA's compliance inspection, EPA's letter also requested certain information about the storage of uranium trioxide located in the Uranium Management Center at PORTS. DOE and BJC are in the process of compiling information that is responsive to your request about this AEA Special Nuclear Material. We will provide this information to EPA as soon as our efforts are complete.

If you have any questions about this response or other compliance issues at PORTS, please do not hesitate to call Rachel Blumenfeld, Chief Operating Officer for the Portsmouth/Paducah Project Office, at (859) 219-4002.

Sincerely,

William E. Murphie
Manager

cc:
Paul Little, US/EPA
Melody Stewart, OH/EPA
Rachel Blumenfeld, DOE/PPPO
Ray Miskelley, DOE/PPPO
Jim Gambrell, DOE/PPPO/PORTS
John Meersman, BJC/PORTS

OH7 890 008 983

BECHTEL JACOBS
Bechtel Jacobs Company LLC

DOE Contract No. DE-AC05-03-OR22980
Job No. 23900
ESH-04-319
December 13, 2004

Mr. Walt Francis
Enforcement and Compliance Assurance Branch
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency
Region V
77 West Jackson Boulevard, DE-9J
Chicago, Illinois 60604

Fed Ex 8434 7303 4076

Dear Mr. Francis:

DE-AC05-03-OR22980: 2004 RCRA COMPLIANCE INSPECTION

The purpose of this letter is to respond to the Environmental Protection Agency's (EPA) letter titled, "Notice of Violation, RCRA Compliance Inspection," which the Department of Energy (DOE) and Bechtel Jacobs Company LLC (BJC) received on November 15, 2004. The EPA letter reports EPA's findings resulting from its Resource Conservation and Recovery Act (RCRA) compliance inspection conducted at the Portsmouth Gaseous Diffusion Plant (PORTS) on August 9 and 10, 2004. The EPA letter also requests information associated with materials stored at the PORTS Uranium Management Center. The following information is provided in response to the alleged violations and information request set forth in EPA's letter.

Alleged Violations

DOE and its contractor, BJC, have reviewed the two alleged violations based on EPA's compliance inspection. Each of the allegations (in italics) and DOE's corresponding response are set forth below:

1. Allegation: *"During the inspection of Building X-3346, the inspectors observed a 55-gallon satellite accumulation (SAA) container that was dated 6/18/04. The waste material was identified by Bechtel Jacobs personnel as a 40% solution of Liquox and a 40% solution of potassium permanganate, with an RFD# 3957and a D001 hazardous waste code. Bechtel Jacobs personnel stated that the material was used in Building X-701B. The SAA container of hazardous waste that the inspectors observed in Building X-3346 was not at or near the point of generation or under the control of the operator and should have been designated a less than 90 day container accumulation area. It is our understanding that the container that was observed in Building X-3346 has been transferred to X-7725 for storage. Therefore, U.S. DOE failed to comply with OAC Rule 3745-52-34(C)(1) [40 C.F.R. 262.34(c)(1)], and was therefore required to comply with the requirements of OAC Rule 3745-52-34(A) [40 C.F.R. 262.34(a)]."*

Addition Facts / Homer

ıy of background, sodium permanganate (incorrectly noted in EPA's
ı permanganate) is a product with the brand name Liquox. The sodium
ssue was used in the lance permeation technology demonstration
ıf the demonstration project, the sodium permanganate was injected into
vide in-situ treatment of Dense Nonaqueous Phase Liquids (primarily
associated with the X-701B groundwater plume. The sodium
permanganate was used in an open field in the area of the X-701B groundwater plume; it was not used in Building X-701B, as alleged (there is no such building). The demonstration project was terminated earlier than anticipated, in 2000, due to an accident. The remaining, unused sodium permanganate product was moved from the open field along with other equipment, materials, and chemicals to the X-3346 Building when the remediation project was terminated. BJC and DOE exhausted all efforts to find a use for the unused sodium permanganate product prior to declaring it a waste. When no use for the product could be found, the product was declared a waste on 6/18/04 (RFD # 55872-1), and a SAA was established in the X-3346 Building where the product was stored. The waste consisted solely of the unused sodium permanganate and was not a mixture of 40% Liquox and 40% potassium permanganate as alleged. The X-3346 Building is a locked facility that is under the control of the BJC Facility Manager. On August 10, 2004, the sodium permanganate waste was transferred to a 5-gallon container, and transported to the X-7725 RCRA permitted storage unit at PORTS.

The alleged violation appears to be based on two EPA findings: that the sodium permanganate waste was not being stored at or near the point of generation and that the storage building was not under the control of the operator. Contrary to these findings, as explained above, the sodium permanganate waste was being stored at or near the point of generation—i.e., the building where it was stored when it was declared a waste. The waste was also under the control of the operator, namely BJC.

2. Allegation: *"During the inspection of Building X-326 L Cage, the inspectors observed several instances where containers were stored in such a way that they could not be seen during inspections. Some of the containers were below the metal stand such that you could not see the actual container. The inspector asked if the container was lifted up for visual inspection during the weekly inspections. U.S. DOE personnel said no, that the Material Handlers Group was responsible for labeling and may lift the container out of the metal stand. This is a violation of the inspection requirements set forth in the U.S. DOE-Portsmouth RCRA Permit because the permit requires that each container itself be inspected for integrity."*

   Response: The containers at issue, 5-inch diameter cans, hold mixed waste with high levels of radioactivity that pose a risk of nuclear criticality. In order to avoid a criticality event, such waste must be managed in accordance with Nuclear Criticality Safety (NCS) requirements, including exacting spacing requirements. A criticality event is a nuclear reaction that occurs if a critical mass of radioactive material is brought together. The waste cans at issue are stored in fixed, metal stands in order to meet the requisite NCS

spacing requirements. The cans currently in storage have been packaged in 4 mil plastic bags prior to being placed into the stands. The metal stands are in the shape of a hollow tube, which are open at the top and bottom. Each waste package slides down into the metal tube, leaving approximately a ¼ inch space between the side of the can and the inside wall of the tube. The bottom of the cans and the bottom of the holders are situated approximately ¼ inch above the floor. Storage of the cans in the metal holders has the added benefit of providing shielding for the high levels of radioactivity associated with the cans, thereby reducing radiation doses to potentially affected workers.

The RCRA Part B Permit states that weekly inspections of container integrity will be conducted, looking for the following: corrosion, leaks, bulges, missing bungs, and dents, which jeopardize structural integrity. The inspections for the cans at issue meet these requirements. The cans stored in the metal stands are individually inspected on a weekly basis. The inspector shines a flashlight into each metal stand and observes the top of the cans. The inspector also looks at the floor near the ¼ inch gap at the bottom of the cans for any evidence of leakage or corrosion products. These inspections will reveal defects in the cans' integrity as required by the permit. Based on experience, corrosion on these cans occurs, if at all, on the top of the cans. Any such corrosion would be visible from viewing the top of the cans. In addition, corrosion products or leaks from the waste package would be visible by the inspection of the ¼ inch gap at the bottom of the cans. Bulges and dents would be detected from views from the top of the cans. (Missing bungs are not an issue with the cans.) A view of the metal holders would also inform the inspector of whether there are dents on the cans inside the holders. (Because the cans routinely remain inside the holders, outside forces that would dent the cans would also impact the holders.)

The storage configuration and inspection procedures for the cans at issue are based on DOE's Atomic Energy Act (AEA) requirements, including 10 CFR Part 835, which mandate that doses to workers be As Low As Reasonably Achievable (ALARA). These AEA requirements constrain the available means for inspecting the subject cans. DOE and BJC have considered changing the inspection procedures to have individuals lift every can out of its metal stand for purposes of inspection. However, doing so would increase the annual radiation dose to such individuals and increase NCS risks in the event the waste container is mishandled. The current configuration and inspection procedure allows DOE to both meet its obligations under the AEA and comply with the RCRA permit.

The interplay between AEA and RCRA compliance has been discussed in a variety of regulatory documents. The following information is set forth in 1995 guidance (draft) issued by EPA and NRC (www.epa.gov/radiation/mixed-waste/mw_pg27.htm) under the heading, "Inspection/Surveillance Requirements for Stored Mixed Waste:"

- "Under RCRA, waste storage containers must be inspected on a weekly basis (40 CFR 264.174) and certain above-ground portions of waste storage tanks on a daily

basis (40 CFR 264.195(b)(1)). The purpose of these inspections is to detect leakage from or deterioration of containers. NRC recommends that waste in storage be inspected on at least a quarterly basis. Licensees have expressed concerns that daily or weekly "walk-through" inspections of high activity mixed waste may result in increased exposures to workers at their facilities and thus violate their As Low as Reasonably Achievable (ALARA) programs."

- "The RCRA regulations and permit guidance do not require that inspections of mixed waste in storage must be "walk-through" inspections. NRC and EPA recognize that increased exposures to workers may result from daily or weekly "walk through" inspections and suggest that licensees consider using methods other than walk-through inspections as a means to inspect high-activity mixed waste in storage. Alternative methods for inspection could include the use of remote monitoring devices to determine if a waste container is leaking or television monitors, or other means that are capable of detecting leakage or deterioration. Such alternative methods would comply with the RCRA regulation and would avoid the additional exposures of walk-through inspections. However, these measures should be coupled with a means to promptly locate and segregate or remediate leaking containers."

Additionally, the 1989 Ohio Consent Decree, issued by a Federal District Court, states in Section V, HAZARDOUS WASTE REQUIREMENTS:

"5.1 USDOE shall conduct its current and future treatment, storage, and disposal of all hazardous and mixed waste at PORTS in accordance with Federal and Ohio hazardous waste laws and hazardous waste regulations, including but not limited to the permit requirements of these laws and requirements. However, USDOE is not required to comply with the above requirements, with regard to mixed waste, where compliance will increase the risk to human safety and health or the environment, or, with respect to hazardous or mixed waste, where the requirements would be inapplicable due to the restrictions of 42 U.S.C. 6905(a).

See also RCRA Section 1006(a), 42 USC Section 6905(a) ("Application of chapter and integration with other Acts"). The 1989 Ohio Consent Decree remains in effect at PORTS.

The current inspection procedure for the mixed waste cans at issue is appropriate and consistent with applicable law.

Requested Information

In addition to reporting the findings from EPA's compliance inspection, EPA's letter also requested certain information about the storage of uranium trioxide located in the Uranium Management Center at PORTS. DOE and BJC are in the process of compiling information that is responsive to your request about this AEA Special Nuclear Material. We will provide this information to EPA as soon as our efforts are complete.

If you have any questions about this response or other compliance issues at PORTS, please do not hesitate to call Rosemary Richmond at (740) 897-2967.

Sincerely,

John J. Meersman
Manager of Projects

JJM:RR:mcm

cc: Paul Little, US/EPA
Melody Stewart, OH/EPA
William Murphie, DOE/PPPO
Russ Vranicar, DOE/PORTS
Larry Long, BJC/ORO
Patrick Willison, BJC/ORO
File–Environment, Safety and Health
File–DMC–RC

BECHTEL JACOBS
Bechtel Jacobs Company LLC

DOE Contract No. DE-AC05-03-OR22980
Job No. 23900
ESH-04-319
December 13, 2004

Mr. Walt Francis
Enforcement and Compliance Assurance Branch
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency
Region V
77 West Jackson Boulevard, DE-9J
Chicago, Illinois 60604

Dear Mr. Francis:

DE-AC05-03-OR22980: 2004 RCRA COMPLIANCE INSPECTION

The purpose of this letter is to respond to the Environmental Protection Agency's (EPA) letter titled, "Notice of Violation, RCRA Compliance Inspection," which the Department of Energy (DOE) and Bechtel Jacobs Company LLC (BJC) received on November 15, 2004. The EPA letter reports EPA's findings resulting from its Resource Conservation and Recovery Act (RCRA) compliance inspection conducted at the Portsmouth Gaseous Diffusion Plant (PORTS) on August 9 and 10, 2004. The EPA letter also requests information associated with materials stored at the PORTS Uranium Management Center. The following information is provided in response to the alleged violations and information request set forth in EPA's letter.

Alleged Violations

DOE and its contractor, BJC, have reviewed the two alleged violations based on EPA's compliance inspection. Each of the allegations (in italics) and DOE's corresponding response are set forth below:

1. Allegation: *"During the inspection of Building X-3346, the inspectors observed a 55-gallon satellite accumulation (SAA) container that was dated 6/18/04. The waste material was identified by Bechtel Jacobs personnel as a 40% solution of Liquox and a 40% solution of potassium permanganate, with an RFD# 3957and a D001 hazardous waste code. Bechtel Jacobs personnel stated that the material was used in Building X-701B. The SAA container of hazardous waste that the inspectors observed in Building X-3346 was not at or near the point of generation or under the control of the operator and should have been designated a less than 90 day container accumulation area. It is our understanding that the container that was observed in Building X-3346 has been transferred to X-7725 for storage. Therefore, U.S. DOE failed to comply with OAC Rule 3745-52-34(C)(1) [40 C.F.R. 262.34(c)(1)], and was therefore required to comply with the requirements of OAC Rule 3745-52-34(A) [40 C.F.R. 262.34(a)]."*

Response: By way of background, sodium permanganate (incorrectly noted in EPA's letter as potassium permanganate) is a product with the brand name Liquox. The sodium permanganate at issue was used in the lance permeation technology demonstration project. As part of the demonstration project, the sodium permanganate was injected into the ground to provide in-situ treatment of Dense Nonaqueous Phase Liquids (primarily Trichloroethene) associated with the X-701B groundwater plume. The sodium permanganate was used in an open field in the area of the X-701B groundwater plume; it was not used in Building X-701B, as alleged (there is no such building). The demonstration project was terminated earlier than anticipated, in 2000, due to an accident. The remaining, unused sodium permanganate product was moved from the open field along with other equipment, materials, and chemicals to the X-3346 Building when the remediation project was terminated. BJC and DOE exhausted all efforts to find a use for the unused sodium permanganate product prior to declaring it a waste. When no use for the product could be found, the product was declared a waste on 6/18/04 (RFD # 55872-1), and a SAA was established in the X-3346 Building where the product was stored. The waste consisted solely of the unused sodium permanganate and was not a mixture of 40% Liquox and 40% potassium permanganate as alleged. The X-3346 Building is a locked facility that is under the control of the BJC Facility Manager. On August 10, 2004, the sodium permanganate waste was transferred to a 5-gallon container, and transported to the X-7725 RCRA permitted storage unit at PORTS.

The alleged violation appears to be based on two EPA findings: that the sodium permanganate waste was not being stored at or near the point of generation and that the storage building was not under the control of the operator. Contrary to these findings, as explained above, the sodium permanganate waste was being stored at or near the point of generation—i.e., the building where it was stored when it was declared a waste. The waste was also under the control of the operator, namely BJC.

2. Allegation: *"During the inspection of Building X-326 L Cage, the inspectors observed several instances where containers were stored in such a way that they could not be seen during inspections. Some of the containers were below the metal stand such that you could not see the actual container. The inspector asked if the container was lifted up for visual inspection during the weekly inspections. U.S. DOE personnel said no, that the Material Handlers Group was responsible for labeling and may lift the container out of the metal stand. This is a violation of the inspection requirements set forth in the U.S. DOE-Portsmouth RCRA Permit because the permit requires that each container itself be inspected for integrity."*

Response: The containers at issue, 5-inch diameter cans, hold mixed waste with high levels of radioactivity that pose a risk of nuclear criticality. In order to avoid a criticality event, such waste must be managed in accordance with Nuclear Criticality Safety (NCS) requirements, including exacting spacing requirements. A criticality event is a nuclear reaction that occurs if a critical mass of radioactive material is brought together. The waste cans at issue are stored in fixed, metal stands in order to meet the requisite NCS

spacing requirements. The cans currently in storage have been packaged in 4 mil plastic bags prior to being placed into the stands. The metal stands are in the shape of a hollow tube, which are open at the top and bottom. Each waste package slides down into the metal tube, leaving approximately a ¼ inch space between the side of the can and the inside wall of the tube. The bottom of the cans and the bottom of the holders are situated approximately ¼ inch above the floor. Storage of the cans in the metal holders has the added benefit of providing shielding for the high levels of radioactivity associated with the cans, thereby reducing radiation doses to potentially affected workers.

The RCRA Part B Permit states that weekly inspections of container integrity will be conducted, looking for the following: corrosion, leaks, bulges, missing bungs, and dents, which jeopardize structural integrity. The inspections for the cans at issue meet these requirements. The cans stored in the metal stands are individually inspected on a weekly basis. The inspector shines a flashlight into each metal stand and observes the top of the cans. The inspector also looks at the floor near the ¼ inch gap at the bottom of the cans for any evidence of leakage or corrosion products. These inspections will reveal defects in the cans' integrity as required by the permit. Based on experience, corrosion on these cans occurs, if at all, on the top of the cans. Any such corrosion would be visible from viewing the top of the cans. In addition, corrosion products or leaks from the waste package would be visible by the inspection of the ¼ inch gap at the bottom of the cans. Bulges and dents would be detected from views from the top of the cans. (Missing bungs are not an issue with the cans.) A view of the metal holders would also inform the inspector of whether there are dents on the cans inside the holders. (Because the cans routinely remain inside the holders, outside forces that would dent the cans would also impact the holders.)

The storage configuration and inspection procedures for the cans at issue are based on DOE's Atomic Energy Act (AEA) requirements, including 10 CFR Part 835, which mandate that doses to workers be As Low As Reasonably Achievable (ALARA). These AEA requirements constrain the available means for inspecting the subject cans. DOE and BJC have considered changing the inspection procedures to have individuals lift every can out of its metal stand for purposes of inspection. However, doing so would increase the annual radiation dose to such individuals and increase NCS risks in the event the waste container is mishandled. The current configuration and inspection procedure allows DOE to both meet its obligations under the AEA and comply with the RCRA permit.

The interplay between AEA and RCRA compliance has been discussed in a variety of regulatory documents. The following information is set forth in 1995 guidance (draft) issued by EPA and NRC (www.epa.gov/radiation/mixed-waste/mw_pg27.htm) under the heading, "Inspection/Surveillance Requirements for Stored Mixed Waste:"

- "Under RCRA, waste storage containers must be inspected on a weekly basis (40 CFR 264.174) and certain above-ground portions of waste storage tanks on a daily

basis (40 CFR 264.195(b)(1)). The purpose of these inspections is to detect leakage from or deterioration of containers. NRC recommends that waste in storage be inspected on at least a quarterly basis. Licensees have expressed concerns that daily or weekly "walk-through" inspections of high activity mixed waste may result in increased exposures to workers at their facilities and thus violate their As Low as Reasonably Achievable (ALARA) programs."

- "The RCRA regulations and permit guidance do not require that inspections of mixed waste in storage must be "walk-through" inspections. NRC and EPA recognize that increased exposures to workers may result from daily or weekly "walk through" inspections and suggest that licensees consider using methods other than walk-through inspections as a means to inspect high-activity mixed waste in storage. Alternative methods for inspection could include the use of remote monitoring devices to determine if a waste container is leaking or television monitors, or other means that are capable of detecting leakage or deterioration. Such alternative methods would comply with the RCRA regulation and would avoid the additional exposures of walk-through inspections. However, these measures should be coupled with a means to promptly locate and segregate or remediate leaking containers."

Additionally, the 1989 Ohio Consent Decree, issued by a Federal District Court, states in Section V, HAZARDOUS WASTE REQUIREMENTS:

"5.1 USDOE shall conduct its current and future treatment, storage, and disposal of all hazardous and mixed waste at PORTS in accordance with Federal and Ohio hazardous waste laws and hazardous waste regulations, including but not limited to the permit requirements of these laws and requirements. However, USDOE is not required to comply with the above requirements, with regard to mixed waste, where compliance will increase the risk to human safety and health or the environment, or, with respect to hazardous or mixed waste, where the requirements would be inapplicable due to the restrictions of 42 U.S.C. 6905(a).

See also RCRA Section 1006(a), 42 USC Section 6905(a) ("Application of chapter and integration with other Acts"). The 1989 Ohio Consent Decree remains in effect at PORTS.

The current inspection procedure for the mixed waste cans at issue is appropriate and consistent with applicable law.

Requested Information

In addition to reporting the findings from EPA's compliance inspection, EPA's letter also requested certain information about the storage of uranium trioxide located in the Uranium Management Center at PORTS. DOE and BJC are in the process of compiling information that is responsive to your request about this AEA Special Nuclear Material. We will provide this information to EPA as soon as our efforts are complete.

If you have any questions about this response or other compliance issues at PORTS, please do not hesitate to call Rosemary Richmond at (740) 897-2967.

Sincerely,

John J. Meersman
Manager of Projects

JJM:RR:mcm

cc: Paul Little, US/EPA
Melody Stewart, OH/EPA
William Murphie, DOE/PPPO
Russ Vranicar, DOE/PORTS
Larry Long, BJC/ORO
Patrick Willison, BJC/ORO
File–Environment, Safety and Health
File–DMC–RC

LATA/PARALLAX PORTSMOUTH, LLC

LPP/ESH&Q-05-117
December 12, 2005

Ms. Melody Stewart
Ohio Environmental Protection Agency
Division of Hazardous Waste Management
Southeast District Office
2195 Front Street
Logan, OH 43138

Dear Ms Stewart:

DOE Contract No. DE-AC2405OH20192: 2005 Resource Conservation and Recovery Act Inspection Response

The purpose of this letter is to respond to Ohio Environmental Protection Agency's (OEPA) letter dated November 9, 2005 which the Department of Energy and LATA/Parallax Portsmouth, (LPP) LLC received on November 14, 2005. The OEPA letter reports Ohio EPA's findings resulting from its Resource Conservation and Recovery Act (RCRA) compliance inspection conducted at the Portsmouth Gaseous Diffusion Plant (PORTS) on October 26 and 27, 2005. The following information is provided in response to the alleged violations set forth in OEPA's letter.

Alleged Violations

DOE and its contractor, LPP, have reviewed the alleged violations based on OEPA's compliance inspection. The allegations (in italics) and DOE and LPP's corresponding response are set forth below:

1. Alleged Violation (1), *"Labeling/marking – standards for large quantity handlers of universal waste, OAC rule 745-273-34(A)(E):*

Universal waste batteries, or a container or tank in which the batteries are contained, must be labeled or clearly marked with any one of the following: "Universal Waste-Battery (ies)," or "Waste battery (ies)," or "Used battery (ies)".

During the inspection, on October 26, 2005, a 55-gallon container of used batteries was labeled only as batteries, in violation of this rule. Photographic documentation received on October 27, 2005 by the generator and USDOE has adequately demonstrated compliance with this rule. No further action is required.

(E) Each lamp, or a container or tank in which such lamps are contained, must be labeled or marked clearly with any of the following: "Universal Waste-Lamp(s)," or "Waste lamp(s)," or "Used lamp(s)".

During the inspection, on October 26, 2005, a 55-gallon container of used lamps was labeled only as fluorescent bulbs in violation of this rule. Photographic documentation received on October 27, 2005 by the generator and USDOE has adequately demonstrated compliance with this rule. No further action is required." [Excerpt from the NOV.]

Response: LPP was not the generator of the waste in question. Please see the DOE response to this alleged violation.

2. Alleged Violation (2), *"Evaluation of Wastes, OAC rule 3745-52-11(c): For purposes of compliance with Chapter 3745-270 of the Administrative Code, or if the waste is not listed as a hazardous waste in rules 3745-51-30 to 3745-51-35 of the Administrative Code, the generator must then determine whether the waste is identified in rules 3745-51-20 to 3745-51-24 of the Administrative Code by either: (1) Testing the waste according to the methods set forth in rules 3745-51-20 to 3745-51-24 of the Administrative Code, or according to an equivalent method approved by the Region V Administrator pursuant to 40 CFR 260.21; or (2) Applying knowledge of the hazardous characteristic of the waste in light of the materials or the processes used.*

The PDGP is currently storing 147 containers of Uranium Trioxide as a "Reusable Uranium Product". This material has been stored on-site since 2000. On September 23, 2003, Ohio EPA received analytical data from four of the 147 containers stored on-site. Ohio EPA is concerned with the data which shows a value for chromium ranging from 34.2 to 171 ppm. Based on these total values, Ohio EPA believes that the UO3 may be characteristic for chromium. Based on the above rule, the PGDP must test the UO3 using the toxicity characteristic leaching procedure, test Method 1311 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," U.S. EPA Publication SW-846. Ohio EPA is aware that UO3 from the Savannah River facility was tested using the toxicity leaching procedure in 1993. The TCLP results from the Savannah River UO3 were below the regulatory levels; however, the UO3 currently stored at the PGDP came from the Hanford facility. If the PGDP wishes to use process knowledge to claim that the UO3 is not a characteristic waste, the PGDP must submit information as to how the UO3 was produced at Hanford and any analytical data available." [Excerpt from the NOV]

Response: The uranium trioxide in interim storage at the Portsmouth Gaseous Diffusion Plant (PORTS) is a product and not a waste subject to the characterization requirements of OAC rule 3745-52-11(c). The uranium trioxide stored at PORTS is an intermediate product that was produced at the Department of Energy's (DOE) Hanford site as part of the nuclear fuel cycle. The uranium oxide would have been further processed to produce end-product nuclear fuel; however, down-sizing within the Department made the uranium trioxide and other valuable uranium products surplus to DOE's needs. DOE decided to consolidate the uranium trioxide product from Hanford and other usable uranium products from across the DOE complex at the PORTS Uranium Management Center (UMC) to facilitate and promote the sale of such materials on a national basis. DOE is engaged in marketing for sale the uranium trioxide and other materials in interim storage at the UMC. Commercial firms in the nuclear fuel industry have continued to express interest in acquiring UMC materials, including the uranium trioxide. Because the uranium trioxide is a valuable product, rather than a waste, it is not subject to the waste characterization requirements of Ohio's hazardous waste laws.

Additionally, as special nuclear material, the uranium trioxide is not regulated under state hazardous waste laws. The uranium trioxide is material that has been artificially enriched in the uranium isotope 235 (see 42 U.S.C. 2014(aa)(2)). As such, it has been classified as special nuclear material under the Atomic Energy Act (AEA) and is managed under comprehensive controls established pursuant to the AEA. States are precluded from regulating AEA materials by the legal principles of preemption and sovereign immunity (U.S. v. Commonwealth of Kentucky, 252 F.3d 816 (6th Cir. 2001)). Moreover, Ohio's hazardous waste regulations specifically list AEA special nuclear material as "materials which are

not wastes." For these reasons, the uranium trioxide is not subject to the waste characterization requirements of OAC rule 3745-52-11(c).

It should be noted that the uranium industry follows the fuel specification identified by the American Society for Testing Materials (ASTM) and that available metals analyses indicate that chromium levels in the uranium trioxide (which seem to be a concern to Ohio) are within the applicable ASTM specifications.

3. Alleged Violation (3), *"General Permit Condition, B.20. Emergency Procedures OAC Rule 3745-54-56(A)(2): Whenever there is an emergency situation consisting of imminent or actual harm or hazard to human health or the environment, the emergency coordinator (or his designee when the emergency coordinator is on call) must immediately notify the Ohio EPA."*

Section G-3 and Figure G-3 of the contingency plan states that the Ohio EPA will be notified if the release is outside the facility. As required by the above rule, the PGDP must notify Ohio EPA whenever there is an emergency situation consisting of imminent or actual harm to human health or the environment regardless if the release is inside or outside the facility. The PGDP must revise the contingency plan to reflect the requirement in the above rule and submit the revised plan for review." [Except from the NOV]

Response: The cited rule requires that Ohio EPA be notified in the event of an emergency situation consisting of imminent or actual harm or hazard to human health or the environment; it does not require that the contingency plan contain such a requirement. Ohio EPA has not cited an instance in which PORTS has failed to notify Ohio EPA in the event of an imminent or actual harm or hazard to human health or the environment. In the absence of such a failure, there can be no violation of the cited rule.

The language in the contingency plan that appears to be a concern to Ohio EPA (i.e., "outside the facility") was approved by Ohio EPA on two previous occasions (renewal of the RCRA Part B permit in 2001 and the 2005 Class 3 modification to the Permit). While PORTS maintains that the contingency plan language continues to be consistent with applicable regulations, PORTS has enclosed for Ohio EPA's review a proposed clarifying revision to the contingency plan to address Ohio EPA's concern.

4. Alleged Violation (4), *"General Permit Condition, A.5. Duty to Comply OAC Rule 3745-50-58(A): The Permittee shall comply with all applicable provisions of Ohio Revised Code (ORC) Chapter 3734, all applicable Ohio hazardous waste rules, and all terms and conditions of this permit, except to the extent and for the duration such noncompliance is authorized by the laws of the State of Ohio. Any permit noncompliance, other than noncompliance authorized by the laws of the State of Ohio, constitutes a violation of ORC Chapter 3734 and the rules adopted there under and is grounds for enforcement action, suspension, revocation, modification, revision, denial of a permit renewal application or other appropriate action.*

This violation will be abated when documentation has been received demonstrating compliance with all violations of the permit and OAC." [Excerpt from the NOV]

Response: See the responses to the previous alleged violations.

If you have any questions about this response or other compliance issues at PORTS, please do not hesitate to call Rosemary Richmond at (740) 897-2967.

Sincerely,

Gail Mattson, P.E.
Project Manager

GGM:RR:mcm

cc: Walt Francis, US EPA
Melda Rafferty, PPPO/PORTS
William Murphie, PPPO/LEX
Ray Miskelley, PPPO/LEX
Susan Brechbill, LPP
Mike MacCrae, LPP
Clarence Sheward, TPMC
File – ESH&Q
File – LPP RMDC – RC

2. Dial 911 on any plant phone and report to answering party;

3. Pick up red emergency phone (in selected areas); or,

4. Dial 3025 for the Plant Shift Superintendent .

5. Pull fire alarm box. Remain near the alarm box, if possible, until the Plant Shift Superintendent/Incident Commander or Fire Department arrives; then provide details.

6. Dispatch someone to summon assistance.

After implementing the Contingency Plan, the person discovering the emergency should do whatever can safely be done to minimize the impact of the emergency, including but not limited to performing local evacuation, equipment shutdown or valving isolation, and performing necessary first-aid, if appropriate.

This Contingency Plan will be implemented in the following situations:

1. Fire and/or explosion

   A. A fire causes the release of toxic fumes, hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents.

   B. A fire spreads and could possibly ignite materials at other locations onsite, thus releasing hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents or could cause heat induced explosions, thus releasing hazardous contaminants.

   C. Use of water or water and chemical fire suppressant could result in contaminated runoff.

2. Spills or release of hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents.

   A. The spill could result in the release of flammable liquids or vapors, thus causing a fire or gas explosion hazard.

   B. The spill could cause the release of toxic liquids or fumes.

   C. The spill can be contained onsite, but the potential exists for groundwater contamination.

   D. The spill cannot be contained onsite, resulting in offsite soil contamination and/or ground or surface water pollution.

Regardless of the unit involved or source of hazardous waste or hazardous waste constituents, mixed waste or mixed waste constituents or any release posing an imminent danger to human health or the environment will result in plan implementation. If the Plant Shift Superintendent/Incident Commander determines that the facility has had a FIRE, EXPLOSION OR ANY UNPLANNED SUDDEN OR NON-SUDDEN RELEASE OF HAZARDOUS WASTE OR HAZARDOUS WASTE CONSTITUENTS TO AIR, SOIL, OR SUREFACE WATER, POSING AN IMMINENT OR ACTUAL HARM OR HAZARD TO HUMAN HEALTH OR THE ENVIRONMENT ~~release, fire, or explosion which could threaten human health, or the environment, outside the facility,~~ he will report his findings as follows:

1. To local authorities if an evacuation offsite is requested, and must be available for their consultation

2. To government officials or the National Response Center (using 800/424-8802) and include:

   A. Name and phone number of reporter;
   B. Name and address of facility;
   C. Time and type of incident;
   D. Name and quantity of material(s) involved, to the extent known;
   E. The extent of injuries, if any; and
   F. The possible hazards to human health, or the environment, outside the facility.

EMERGENCY NOTIFICATION FORM

A-3138 (12/13/05)
age 1 of 2

"This is the Portsmouth Gaseous Diffusion Plant, located in Piketon, Ohio, with: *(check one)* ☐ an **EMERGENCY** notification
(Repeat Line) ☐ a DRILL/EXERCISE notification

*1. This is Emergency Notification Number: _____

*2. This is _____ from the Portsmouth Gaseous Diffusion Plant calling with information regarding an emergency at the Plant. Please use the following phone numbers and/or locations for additional information: Plant Shift Superintendent's Office (740) 897-3025 or Emergency Operations Center (740) 897-2309 or (740) 897-4019.

*3. Emergency Classification: *(check one)*
a. ☐ ALERT at _____ hrs.
b. ☐ SITE AREA EMERGENCY at _____ hrs.
c. ☐ Terminated at _____ hrs.
d. ☐ Classification changed at _____ hrs.
e. ☐ Other: _____

EAL Section: _____

*4. Event Description: _____

*5. Plant Status (impact on plant): *(check one)* a. ☐ Operating b. ☐ Shutdown c. ☐ Being Shutdown

*6. OFF-SITE Protective Actions Recommended: *(check one)*
a. ☐ No protective actions recommended at this time.
b. ☐ Off-site sheltering recommended within 2-mile Immediate Notification Area.
c. ☐ Other: _____

*7. Public Warning Siren Activation: *(check one)*
a. ☐ Have **not** been recommended.
b. ☐ Have been recommended (required for all Site Area Emergencies)

*8. EAS Message Recommended: *(check one)*
a.☐ Message #1, No Actions Required
b.☐ Message #2, Sheltering Required
c.☐ Message #3, Evacuation
d.☐ Message #4, All Clear
e.☐ Message #5, Exercise/Drill
f. ☐ Message #6, Unintentional Siren
g.☐ Message #7, Other _____
h.☐ No Message Recommended

*9. Release Information: *(check one)*
a.☐ No release has occurred, and **NO** potential for release exists
b.☐ No release has occurred, however **potential** for release exists
c.☐ Release is occurring: (circle one) Onsite only / Off-site
d.☐ Release occurred, but has stopped

*10. Material Released: _____

11. Type of Release: *(check one)* a. ☐ Surface b. ☐ Water c. ☐ Air d. ☐Other: _____

12. Estimate of Release Quantity: _____ Time/Duration of Release: _____

13. Meteorological Conditions at PORTS: Wind is from the _____ (N,SW,ESE, etc.) at _____mph. Stability Class is _____

14. Emergency Notification Information Approved by: _____ Date: _____ Time: _____
(circle one) CM or PSS (Telecon)

***Items must be completed for initial notification**

EMERGENCY NOTIFICATION FORM

Agency	Telephone	Contacted by FAX	Person Contacted	Date/ Time
Pike County Sheriff's Office	(740) 947-2111, Press "1" Fax (740) 947-1049	Yes: _____ No: _____		
Ohio Emergency Management Agency	(614) 889-7150 Fax (614) 889-7183	Yes: _____ No: _____		
DOE Oak Ridge Operations Center, after calls to state and locals	(865) 576-1005 Fax (865) 576-9772	Yes: _____ No: _____		
NRC Operations Center, after calls to state and locals and within 1 hour of classification	(301) 816-5100 (301) 951-0550 (301) 415-0550 Fax (301) 816-5151	Yes: _____ No: _____		

USEC Headquarters notification: Begin with first listed name on USEC Notification List until a contact is made.

Person Contacted: Date/Time:

Name	Office Phone	Home Phone	Cellular Phone
Russ Starkey	(301) 564-3459	Non-responsive	Non-responsive
Bob VanNamen	(301) 564-3312		
John Welch	(301) 564-3300		

NOTIFY THE FOLLOWING AGENCIES AS REQUIRED

Agency	Telephone	Contacted by FAX	Person Contacted	Date/ Time
If a hazardous or toxic release at PORTS has, or may affect Scioto County, notify within 15 minutes from time of discovery:				
Scioto County LEPC and Scioto County EMA	(740) 354-7566 Fax (740) 355-8237	Yes: _____ No: _____		
If the facility has a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water, posing an imminent or actual harm or hazard to human health or the environment, immediately notify:				
Ohio EPA	(800) 282-9378 Fax (614) 644-3250	Yes: _____ No: _____		
If a release of a chemical or toxic substance in excess of the reportable quantities established under CERCLA section 102, notify within 30 minutes from time of discovery.				
Ohio EPA	(800) 282-9378 Fax (614) 644-3250	Yes: _____ No: _____		
National Response Center	(800) 424-8802	Not Applicable		
If the event results in a single fatality or offsite hospitalization to three (3) or more individuals, notify within 8 hours from time of discovery:				
OSHA	(800) 321-6742 Fax (513) 841-4114	Yes: _____ No: _____		

NOTE: ALWAYS VERIFY AGENCY FAX NUMBER WITH CONTACT BEFORE TRANSMITTING INFORMATION

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

DE-9J

NOV 15 2004

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William E. Murphie
Manager
Portsmouth/Paducah Project Office
U.S. Department of Energy
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

Mr. John Meersman
Manager of Projects
Bechtel Jacobs Company LLC
P.O. Box 900
Piketon, Ohio 45661

Re: Notice of Violation
RCRA Compliance Inspection
U.S. Department of Energy
Portsmouth Gaseous Diffusion Plant
Piketon, Ohio
OH7 890 008 983

Dear Messrs. Murphie and Meersman:

On August 9 and 10, 2004, representatives of the United States Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) inspected the U.S. Department of Energy (U.S. DOE) Portsmouth Gaseous Diffusion Plant located near Piketon, Ohio. The purpose of the inspection was to evaluate compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection checklists for your reference.

Based on information provided by U.S. DOE and Bechtel Jacobs personnel, review of records, and personal observations by the inspectors, U.S. EPA finds that U.S. DOE is in violation of the following requirements of the Ohio Administrative Code (OAC) and the United States Code of Federal Regulations (CFR):

Recycled/Recyclable . Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

1) A generator may accumulate as much as fifty-five gallons of hazardous waste or one quart of acutely hazardous waste listed in paragraph E of rule 3745-51-33 of the OAC in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit and without complying with the requirements of OAC Rule 3745-52-34(A). See, OAC §§ 3745-52-34 (C)(1) [40 CFR §§ 262.34(c)(1)].

During the inspection of Building X-3346, the inspectors observed a 55-gallon satellite accumulation (SAA) container that was dated 6/18/04. The waste material was identified by Bechtel Jacobs personnel as a 40% solution of Liquox and a 40% solution of potassium permanganate, with an RFD # 3957 and a D001 hazardous waste code. Bechtel Jacobs personnel stated that the material was used in Building X-701B. The SAA container of hazardous waste that the inspectors observed in Building X-3346 was not at or near the point of generation or under the control of the operator and should have been designated a less than 90 day container accumulation area. It is our understanding that the container that was observed in Building X-3346 has been transferred to X-7725 for storage. Therefore, U.S. DOE failed to comply with OAC Rule 3745-52-34(C)(1) [40 C.F.R. § 262.34(c)(1)], and was therefore required to comply with the requirements of OAC Rule 3745-52-34(A) [40 C.F.R. § 262.34(a)].

2) The U.S. DOE-Portsmouth RCRA Permit, Module C - Container Storage, Section C.8, Inspection Schedules and Procedures (OAC Rule 3745-54-15 and 3745-54-73) specifies that the Permitee shall inspect the container storage area in accordance with the approved inspection schedule contained in Section F of the Part B permit application, to detect leaking containers and deterioration of containers and the containment system caused by corrosion, or other factors. The Part B permit application in Section F-2A(2) specifies that Building X-7725 and Building X-326 storage units are to be inspected by facility personnel on a weekly basis. The Permitee shall note the results of these inspections in the inspection log along with any remedial actions taken.

During the inspection of Building X-326 L Cage, the inspectors observed several instances where containers were stored in such a way that they could not be seen during inspections. Some of the containers were below the metal stand such that you could not see the actual container. The inspectors asked if the container was lifted up for visual inspection during the weekly inspections. U.S. DOE Portsmouth personnel said no, that the Materials Handlers Group was responsible for labeling and may lift the container out of the metal stand. This is a violation of the inspection requirements set forth in the U.S. DOE-Portsmouth RCRA Permit because the permit requires that each container itself be inspected for integrity.

In addition, during the inspection of the Uranium Management Center, Building X-744G, the inspectors observed over 100 uranium trioxide hoppers stored outside under a canopy. U.S. EPA and OEPA understand that this material has been stored at U.S. DOE-Portsmouth since the

year 2000, and each T-Hopper contains approximately 5.4 metric tons of material. U.S. EPA and OEPA have reviewed the 2003 T-Hopper Report. The 2003 T-Hopper Report states that this "surplus" material was generated at U.S. DOE - Hanford and shipped to the U.S. DOE - Portsmouth facility for storage. The data summary sheet includes information on the concentration of chromium in the uranium trioxide, which is listed as a minimum of 34.2 mg/kg to a maximum of 171 mg/kg. In your response to this letter, please provide all documents confirming that this material is suitable for sale, or has been sold as blend stock grade uranium trioxide, all documents and other information on how this material is handled or treated before being used, and also include any documentation that U.S. DOE has in its possession that demonstrates that the T-Hopper material would not be characteristically hazardous for chromium. In addition, please confirm that this material is not being accumulated speculatively (see OAC 3745-51-02(C)(4) [40 CFR 261.1(c)(8)]).

Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a), U.S. EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above requirements.

You should submit your response to Walt Francis, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604. In addition, please submit a copy of your response to Melody Stewart at the OEPA Southeast District Office, 2195 Front Street, Logan, Ohio 43138.

If you have any questions regarding this letter, please contact Walt Francis of my staff at (312) 353-4921.

Sincerely yours,

Michael Brodie for

Paul Little, Chief
Compliance Section # 2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosure

cc: Melody Stewart, OEPA-Southeast District Office

RCRA HAZARDOUS WASTE GENERATOR INSPECTION CHECKLIST

ompany: U.S. Department of Energy - Portsmouth Gaseous Diffusion Plant EPA ID#: OH7 890 008 983

Street: 3930 US Route 23 South City: Piketon

County: Pike State: Ohio Zip: 45661

Mailing Address: PO Box 700, Piketon, Ohio 45661-0700

(If different from above)

Telephone: 740-897-5010 Fax #: _____

Owner/ Operator: Federal Government/Co-Operator Bechtel Jacobs Company LLC

(If different from above)

Street: _____

City: _____ State: Ohio Zip: _____

Inspection Date(s): 8/9/2004 - 8/11/2004 Time(s): 8:00 am -

Inspection Announced? _____ Yes ___X__NO If so, how much advance notice given?_____

	Name	Affiliation	Telephone
Inspectors:	Melody Stewart	OEPA	740-380-5256
	Walt Francis	U.S. EPA	312-353-4921
Facility Representative:	Cliff Beeks	BJC	740-897-3579
	Mary Williams	BJC	740-897-5010
	Rosemary Richmond	BJC	740-897-2967
	Sandy Childers	BJC	740-897-2336

Complete All Other Applicable Checklists

Generator Classification	Waste Management Activity
_____ Conditionally Exempt SQG (CESQG)	___X__ Containers
_____ Small Quantity Generator (SQG)	_____ Tank(s)
___X__ Large Quantity Generator (LQG)	_____ Land Disposal Requirements (LDR)
_____ No Generation	_____ Used Oil
[redacted]	___X__ Universal Waste
[redacted]	_____ Other

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

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

PROCESS DESCRIPTION

Historically, the main function of the DOE-PORTS facility was to enrich uranium for military use (nuclear submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in UF6 feedstock which contains 0.711% U235. However, in 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). USDOE retained ownership of the ongoing site environmental restoration program as well as two permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and are leased by USEC. These include decontamination of equipment and uranium recovery (X-705 Bldg.); chemical cleaning of equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); photo and printing lab (X-100); vehicle repair (X-750); coal pile runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in DOE owned and permitted storage facilities. Waste generated by DOE from the environmental restoration is also stored in these facilities. USEC ceased the enrichment process in May 2001.

WASTE MANAGEMENT, GENERATION AND AMOUNT

Uranium contaminated hazardous wastes (mixed waste) which were/are generated by USEC and DOE are stored on-site in DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of TSDs in the U.S. which could accept mixed waste, and a May 1991 DOE moratorium on off-site waste shipment. A large percentage of the waste generated at PORTS is DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in DOE-owned storage areas. During the past year, numerous shipments of hazardous waste were manifested off-site by both DOE and USEC. This is due to an increase in treatment capacity at off-site commercial treatment facilities and DOE treatment facilities, the lifting of the moratorium, and the execution of the site treatment plans for DOE and USEC. DOE sends some waste off-site (to U.S. DOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to DOE for storage in the interim prior to their final disposal.

Hazardous

The DOE Part B permit lists numerous hazardous waste codes for wastes that are generated by the above processes and the environmental restoration. These are stored in drums ranging in size from 30 to 110 gallon capacity, 5 gallon containers, 20 gallon lab packs, 5' cans, 4'x4'x6' boxes, 4'x4'x8' boxes, polybottles and laboratory bottles.

Nonhazardous

A wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes.

HAZARDOUS WASTE MANAGEMENT UNITS

The following DOE-owned permitted storage facilities were inspected during the CEI:

-X-7725	Container Storage Facility
-X-326	Container Storage Facility

In addition, DOE-owned and operated HWMUs and SAAs were inspected in the following buildings:

-X-326	-X-622
-X-7725	-X-624
-X-623	-X-3012
-X-333	-X-330
-X-622T	-X-747H
-X-3346	

Other Areas - X-744G Uranium Management Center

REGULATORY/ENFORCEMENT HISTORY

As a result of violations of state and federal hazardous waste regulations found during the 1987, 1988, and 1989 OEPA RCRA inspections, USDOE and OEPA entered into a Consent Decree governing restoration of the environment at DOE-PORTS. This decree includes a requirement that DOE close the X-701B, X-749, X-231B, and X-616 units within specific timeframes. The X-749, X-616 and X-231B units have now been closed. X-701B is yet to be closed.

On October 4, 1995, DFFOs were signed which allowed DOE to store LDR wastes in excess of one year, so long as waste is being stored in compliance with the orders and an approved site treatment plan. These orders supercede the May 18, 1993, DFFOs.

On February 24, 1998, DOE, LMES and Ohio signed DFFOs and a Consent Order regarding past violations and the management of DUF6 and LiOH.

On March 18, 1999, DOE and Ohio EPA signed DFFOs. These DFFOs provide exemptions to DOE and integrate the following unclosed units into the CMS/CMI process: X-749, X-231B, X-701C, X701B, X-230J7, and X-744Y.

A RCRA Permit was issued to DOE and its current co-operator, Bechtel Jacobs, for the X-7725 and X-326 storage facilities on March 15, 2001.

POLLUTION PREVENTION

Note to the Inspector: This checklist has been developed to help the division in gathering general information about the pollution prevention (P2) practices that the company may have initiated or attempted to initiate. The checklist is also used to:

- Facilitate P2 discussions;
- Identify barriers to P2;
- Define the P2 universe;
- Identify the need for future P2 initiatives;
- Identify partnership opportunities; and
- Link companies with better P2 resources.

As a prelude to completing this checklist the inspector should use the following list of questions as a way to initiate a dialogue concerning P2:

1. Have you tried to reduce the volume of waste (hazardous and nonhazardous) that you generate?

2. What is the largest waste stream that you generate?

3. How important would it be to you to eliminate that waste stream?

4. Does your company understand the reduced regulatory burden and cost saving benefits that eliminating or reducing a waste stream can have?

5. Could you use better housekeeping practices to reduce the amount of waste that you generate?

If the company responds with one of the answers below, the appropriate box should be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided or in the remarks section.

1. Has the company undertaken any P2 activities to reduce the amount of hazardous waste generated? Yes X No___N/A ___RMK#___

   a. ***If so,*** what has the company done to minimize hazardous waste generation?

   - ☐ A change in the process resulting in less waste.
   - ☐ A change in the product resulting in less waste.
   - ☐ Use of fewer and less toxic hazardous raw materials.
   - ☐ Better operations/improved housekeeping.
   - ☐ On-site recycling/reuse of hazardous materials.
   - ☑ Sending waste off-site for recycling/reuse.
   - ☐ Other activities (specify): _____

   b. ***If so,*** what hazardous wastes have been addressed?

   - ☐ Solvents
   - ☐ Paint related wastes

- ☐ Industrial process wastes (sludges, slags, contaminated waste waters, etc)
- ☐ Contaminated oils/hydraulic fluids
- ☐ Off-spec chemicals
- ☒ Fluorescent light bulbs
- ☒ Used batteries
- ☐ Shop rags
- ☐ Other (specify): _____

c. ***If not,*** why hasn't the company considered P2?

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

2. Does the company plan to do P2 activities in the future? Yes X No ___ N/A ___RMK#___

3. Would the company be interested in receiving additional information from Ohio EPA about P2? Yes X No___ N/A ___RMK#___

4. Did you give the company information about P2 during the inspection? Yes X No___ N/A ___RMK#___

5. Would the company like a P2 assessment? Yes___ No X N/A ___RMK#___

If the company would like a P2 assessment done at their facility, the inspector must give the company representative a copy of the Pollution Prevention Assessments for Hazardous Waste Generators document and discuss it with them.

6. If the company does not want a P2 assessment, why not? Company has program in-place.

REMARKS

- Recycle Batteries
- Receive 250 GAL containers

LARGE QUANTITY GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] — Yes X No ☐ N/A ___ RMK#___

2. Has the generator obtained an identification number? [3745-52-12] — Yes X No ☐ N/A ___ RMK#___

3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41] — Yes X No ☐ N/A ___ RMK#___

WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? If so: — Yes___ No X N/A ___ RMK#___

   a. Has the generator notified U.S. EPA of export/import activity? [3745-52-53] — Yes ___ No ☐ N/A X RMK#___

   b. Has the generator complied with special manifest requirements? [3745-52-54] — Yes ___ No ☐ N/A X RMK#___

   c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] — Yes ___ No ☐ N/A X RMK#___

   d. Has an annual report been submitted to U.S. EPA? [3745-52-56] — Yes ___ No ☐ N/A X RMK#___

   e. Are export related documents being maintained on-site? [3745-52-57] — Yes ___ No ☐ N/A X RMK#___

GENERATOR CLOSURE REQUIREMENTS

5. Has the generator closed any <90-day accumulation unit(s) since the date of the last inspection? If so: — Yes___ No X N/A ___ RMK#___

   a. Describe the unit(s) which the generator has closed.

   b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] — Yes ___ No ☐ N/A X RMK#___

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

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

REMARKS

MANIFEST REQUIREMENTS

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

Are you aware of what the statement that you sign on the manifest says? Yes X No___

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

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

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

2. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] — Yes X No ❑ N/A ___RMK#___

NOTE: ***U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]***

3. Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)] — Yes X No ❑ N/A ___RMK#___

NOTE: ***The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].***

4. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: — Yes___ No X N/A ___RMK#___

   a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] — Yes ___ No ❑ N/A X RMK#___

5. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)] — Yes X No ❑ N/A ___RMK#___

6. Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not: — Yes X No___ N/A ___RMK#___

   a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)] — Yes X No ❑ N/A ___RMK#___

b. If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]

Yes ___ No ☐ N/A X RMK#___

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

Yes X No ☐ N/A ___RMK#___

REMARKS

PERSONNEL TRAINING

1. Does the generator keep records required by 3745-65-16(D) including:

   a. Job titles, as they relate to hazardous waste management, and the name of each employee filling each job? Yes X No ☐ N/A ___RMK#___

   b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position? Yes X No ☐ N/A ___RMK#___

   c. Type and amount of both introductory and continuing training to be given to each person filling a position? Yes X No ☐ N/A ___RMK#___

   d. Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)? Yes X No ☐ N/A ___RMK#___

NOTE: ***If the facility's business practices precludes written job titles/descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be used to document that all necessary employees have been trained.***

2. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to their positions? [3745-65-16(A)(2) Yes X No ☐ N/A ___RMK#___

3. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]

   a. Emergency procedures? Yes X No ☐ N/A ___RMK#___

   b. Emergency equipment? Yes X No ☐ N/A ___RMK#___

   c. Emergency systems? Yes X No ☐ N/A ___RMK#___

4. Does emergency training described in 3(a), (b) and (c) above include, *where applicable*: [3745-65-16(A)(3)(a-f)

   a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? Yes X No ☐ N/A ___RMK#___

   b. Key parameters for automatic waste feed cut-off systems? Yes X No ☐ N/A ___RMK#___

c. Communication or alarm system? Yes X No ☐ N/A ___RMK#___

d. Response procedures for fire/explosions? Yes X No ☐ N/A ___RMK#___

e. Response to groundwater contamination incidents? Yes X No ☐ N/A ___RMK#___

f. Shutdown procedures? Yes X No ☐ N/A ___RMK#___

5. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] TFA - Yes X No ☐ N/A ___RMK#___

6. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes X No ☐ N/A ___RMK#___

7. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes X No ☐ N/A ___RMK#___

8. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)] Yes X No ☐ N/A ___RMK#___

9. Are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes X No ☐ N/A ___RMK#___

10. ***Optional***: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifests, etc.

Job Performed	Name of Employee	Date(s)Trained
Weekly Inspections	Jeremy Davis	
~~Ross Cassidy~~ " ?	Ross Cassidy	

REMARKS

CONTINGENCY PLAN

1. Does the generator have a contingency plan which describes the following: [3745-65-52(A) through (F)]

   a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? — Yes X No ☐ N/A ___ RMK#___

   b. Arrangements/agreements with emergency authorities? [3745-65-37] — Yes X No ☐ N/A ___ RMK#___

   c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? — Yes X No ☐ N/A ___ RMK#___

   d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? — Yes X No ☐ N/A ___ RMK#___

   e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary? — Yes X No ☐ N/A ___ RMK#___

NOTE: ***If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]***

2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] — Yes X No ☐ N/A ___ RMK#___

3. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)(B)] — Yes X No ☐ N/A ___ RMK#___

4. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] — Yes X No ☐ N/A ___ RMK#___

12/22/03 version

EMERGENCY COORDINATOR

5. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] — Yes X No ☐ N/A ___ RMK#___

Lewis Goidell - 10/2/02

NOTE: ***The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan***

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes___ No X N/A ___RMK#___

   a. Was the contingency plan implemented? [3745-65-51(B)] Yes ___ No ☐ N/A X RMK#___

   b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes ___ No ☐ N/A X RMK#___

   c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes ___ No ☐ N/A X RMK#___

NOTE: ***OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.***

REMARKS

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

1. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] — Yes X No ☐ N/A ___ RMK#___

2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]

   a. Internal alarm system? — Yes X No ☐ N/A ___ RMK#___

   b. Emergency communication device? — Yes X No ☐ N/A ___ RMK#___

   c. Portable fire control, spill control and decon equipment? — Yes X No ☐ N/A ___ RMK#___

   d. Water of adequate volume/pressure? — Yes X No ☐ N/A ___ RMK#___

3. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] — Yes X No ☐ N/A ___ RMK#___

4. Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33] — Yes X No ☐ N/A ___ RMK#___

5. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32)*? [3745-65-34] — Yes X No ☐ N/A ___ RMK#___

6. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] — Yes X No ☐ N/A ___ RMK#___

7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] — Yes X No ☐ N/A ___ RMK#___

   a. Where authorities have declined to enter into arrangements/agreements, has the generator documented such a refusal? [3745-65-37(B)] — Yes ___ No ☐ N/A X RMK#___

REMARKS

GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)] — Yes ☐ No X N/A ___ RMK#___

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

2. Does the generator ensure that satellite accumulation area(s):

   a. Are at or near a point of generation? — Yes ___ No ☒ N/A ___ RMK# 1

   b. Are under the control of the operator of the process generating the waste? — Yes ___ No ☒ N/A ___ RMK# 1

   c. Do not exceed a total of 55 gallons of hazardous waste? — Yes X No ___ N/A ___ RMK#___

   d Do not exceed one quart of acutely hazardous waste at any one time? — Yes X No ☐ N/A ___ RMK#___

   e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? — Yes X No ☐ N/A ___ RMK#___

NOTE: The 55 gallon limit applies to the area itself, and not to each individual waste stream accumulated in the area. The inspector should refer to Ohio EPA's November 1994 Guidance on the Location of Satellite Accumulation Areas.

3. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so: — Yes ___ No X N/A ___ RMK#___

   a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? — Yes ___ No ☐ N/A X RMK#___

   b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? — Yes ___ No ☐ N/A X RMK#___

USE AND MANAGEMENT OF CONTAINERS

4. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] — Yes X No ☐ N/A ___ RMK#___

5. Is the accumulation date on each container? [3745-52-34(A)(2)] — Yes X No ☐ N/A ___ RMK#___

RMK#1 – Building X – 3346 – SAA not at or near point of generation.

6. Are hazardous wastes stored in containers which are:

   a. Closed (except when adding/removing wastes)? [3745-66-73(A)] — Yes X No ☐ N/A ___ RMK#___

   b. In good condition? [3745-66-71] — Yes X No ☐ N/A ___ RMK#___

   c. Compatible with wastes stored in them? [3745-66-72] — Yes X No ☐ N/A ___ RMK#___

   d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] — Yes X No ☐ N/A ___ RMK#___

7. Is the container accumulation area(s) inspected weekly? [3745-66-74] (*Note location in general information section of checklist)* — Yes X No ☐ N/A ___ RMK#___

   a. Are inspections recorded in a log or summary? [3745-66-74] — Yes X No ☐ N/A ___ RMK#___

8. For ignitable and/or reactive hazardous waste(s):

   a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] — Yes X No ☐ N/A ___ RMK#___

   b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] — Yes X No ☐ N/A ___ RMK#___

PRE-TRANSPORT REQUIREMENTS

9. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] — Yes X No ☐ N/A ___ RMK#___

10. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] — Yes X No ☐ N/A ___ RMK#___

11. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] — Yes X No ☐ N/A ___ RMK#___

E:\USDOEPortsmouthChecklists\USDOEPortsLQG2004.wpd

REMARKS

LARGE QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

GENERAL REQUIREMENTS

.	Has the LQUWH obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)]	Yes ___ No ❑ N/A X RMK#___

PROHIBITIONS

2.	Did the LQUWH dispose of universal waste? [3845-273-31(A)]	Yes ■ No ___ N/A ___ RMK#___
3.	Did the LQUWH dilute or treat universal waste, except when responding to releases or by managing specific wastes as provided in OAC 3745-273-33? [3745-273-31(B)]	Yes ❑ No ___ N/A X RMK#___

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES:

4.	Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)]	Yes ___ No ❑ N/A X RMK#___
.	If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage?	Yes ___ No ❑ N/A X RMK#___
6.	Does the LQUWH conduct any of the following activities:	
	a. Sort batteries by type?	Yes X No ___ N/A ___ RMK#___
	b. Mix battery types in one container?	Yes ___ No X N/A ___ RMK#___
	c. Discharge batteries to remove the electric charge?	Yes ___ No X N/A ___ RMK#___
	d. Regenerate used batteries?	Yes ___ No X N/A ___ RMK#___
	e. Disassemble them into individual batteries or cells?	Yes ___ No X N/A ___ RMK#___
	f. Remove batteries from consumer products?	Yes X No ___ N/A ___ RMK#___
	g. Remove the electrolyte from the battery?	Yes ___ No X N/A ___ RMK#___
	If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-33(A)(2)]	Yes ❑ No ___ N/A X RMK#___

7. If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)] — Yes ___ No ☐ N/A _X_ RMK#___

   a. If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)] — Yes ___ No ☐ N/A _X_ RMK#___

   b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)] — Yes ___ No ☐ N/A _X_ RMK#___

8. Are the battery(ies) or container(s) of batteries located with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-34(A)] — Yes X No ☐ N/A ___ RMK# 2

UNIVERSAL WASTE PESTICIDES

9. Does the LQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-33(B)(1)] — Yes ___ No ☐ N/A _X_ RMK#___

10. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-33(B)(2)] — Yes ___ No ☐ N/A _X_ RMK#___

11. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 66-992, except for paragraph (C) of 3745-66-97; rule 3745-66-991 and 3745-66-992 of the OAC met? [3745-273-33(B)(3)] — Yes ___ No ☐ N/A _X_ RMK#___

12. Is pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-33(B)(4)] — Yes ___ No ☐ N/A _X_ RMK#___

13. Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)] — Yes ___ No ☐ N/A _X_ RMK#___

14. Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)]

Yes ___ No ❑ N/A _X_ RMK#___

UNIVERSAL WASTE THERMOSTATS

15. Are thermostats that show evidence of leakage, spillage or damage that could cause leaks, properly contained? [3745-273-33(C)(1)]

Yes ___ No ❑ N/A _X_ RMK#___

16. If the thermostats are contained, are the containers closed, structurally sound, compatible with contents of the thermostats and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(C)(1)]

Yes ___ No ❑ N/A _X_ RMK#___

17. If the mercury-containing ampules are removed, does the LQUWH: [3745-273-33(C)(1)]

a. Remove the ampules in a manner to prevent breakage and is the removal done over a containment device? [3745-273-33(C)(2)(a)(b)]

Yes ___ No ❑ N/A _X_ RMK#___

b. Have a clean-up system readily available to transfer spilled material to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-33(C)(2)(c)(d)]

Yes ___ No ❑ N/A _X_ RMK#___

c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-33(C)(2)(e)]

Yes ___ No ❑ N/A _X_ RMK#___

d. Ensure employees are thoroughly familiar with proper waste handling and emergency procedures? [3745-273-33(C)(2)(f)]

Yes ___ No ❑ N/A _X_ RMK#___

e. Ensure removed ampules are stored in closed, non-leaking containers that are in good condition? [3734-273-33(C)(2)(g)]

Yes ___ No ❑ N/A _X_ RMK#___

f. Pack removed ampules in containers with packing material to prevent breaking during storage, handling and transportation? [3745-273-33(C)(2)(h)]

Yes ___ No ❑ N/A _X_ RMK#___

18. If mercury or clean-up residues resulting from spills or leaks or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-33(C)(3)(a)] — Yes ___ No ❑ N/A _X_ RMK#___

a. If the waste is characteristic, was it managed in compliance with 3745-50 through 3745-69? (*The handler is considered the generator of the mercury, residues, and/or other waste and is subject to Chapter 3745-52)* [3745-273-33(C)(3)(b)] — Yes ___ No ❑ N/A _X_ RMK#___

b. If the mercury, residues and/or other waste are not hazardous, are they managed in compliance with applicable law? [3745-273-33(C)(3)(c)] — Yes ___ No ❑ N/A _X_ RMK#___

19. Are the thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)" [3745-273-34] — Yes ___ No ❑ N/A _X_ RMK#___

ACCUMULATION TIME

20. Is the waste accumulated for less than one year? [3745-273-35(A)] — Yes _X_ No ___ N/A ___ RMK#___

a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on handler to demonstrate) [3745-273-35(B)] — Yes ___ No ❑ N/A _X_ RMK#___

NOTE: ***Accumulation is defined as date generated or date received from another handler.***

21. Has the length of time the universal waste has been accumulated documented by ***one*** of the following: [3745-273-35(C)] — Yes _X_ No ❑ N/A ___ RMK#___

a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-35(C)(1)] — Yes _X_ No _ N/A ___ RMK#_3_

b. Marking or labeling the individual item of universal waste with the date that it became a waste or was received? [3745-273-35(C)(2)] — Yes ___ No _X_ N/A ___ RMK#___

c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-35(C)(3)] — Yes ___ No _X_ N/A ___ RMK#___

d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-35(C)(4)] — Yes ___ No X N/A ___ RMK#___

e. Placing the universal waste in a specific accumulation area and identifying the earliest that any universal waste in the area became a waste or was received? [3745-273-35(C)(5] — Yes ___ No X N/A ___ RMK#___

f. Any other method which clearly demonstrates the length of time the universal waste has been accumulated from the date it became a waste or is received? [3745-273-35(C)(6)] — Yes ___ No X N/A ___ RMK#___

EMPLOYEE TRAINING

22. Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36] — Yes X No ❑ N/A ___ RMK#___

RESPONSE TO RELEASES

23. Were releases of universal waste and other residues immediately contained? [3745-273-37(A)] — Yes ___ No ❑ N/A X RMK#___

24. Was the released material characterized? [3745-273-37(B)] — Yes ___ No ❑ N/A X RMK#___

25. If the released material was a hazardous waste, was it managed as required in OAC 3745-50 through 3745-69? *(If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52)* [3745-273-37(C)] — Yes ___ No ❑ N/A X RMK#___

OFF-SITE SHIPMENTS

NOTE: ***If a LQUWH self-transports wastes, then the handler must comply with the Universal Waste transporter requirements.***

26. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)] — Yes X No ❑ N/A ___ RMK#___

NOTE: ***LQUWHs are prohibited to send waste to any other facility.***

27. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-38(C)] — Yes _X_ No ❑ N/A ___ RMK#___

28. Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)] — Yes _X_ No ❑ N/A ___ RMK#___

29. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following: — Yes ___ No ❑ N/A _X_ RMK#___

    a. Receive the waste back? [3745-273-38(E)(1)] — Yes___ No___ N/A _X_RMK#___

    b. Agree to where shipment will be sent? [3745-273-38(E)(2)] — Yes___ No___ N/A _X_RMK#___

30. If a handler rejects a partial or full load from another handler, does the receiver handler contact the originating handler and discuss one of the following: — Yes ___ No ❑ N/A _X_ RMK#___

    a. Sending the waste back to originating handler? [3745-273-38(F)(1)] — Yes___ No___ N/A _X_RMK#___

    b. Sending the shipment to a destination facility? [3745-273-38(F)(2)] — Yes___ No___ N/A _X_RMK#___

31. If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)] — Yes ___ No ❑ N/A _X_ RMK#___

32. If the handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-38(H)] — Yes ___ No ❑ N/A _X_ RMK#___

TRACKING UNIVERSAL WASTE SHIPMENTS

33. Are universal waste received from another handler? If so: Yes___ No X N/A ___RMK#___

a. Is a record of each shipment kept? [3745-273-39(A)] Yes ___ No ❑ N/A X RMK#___

NOTE: ***This record can be in the form of a log, invoice, manifest, bill of lading, or other shipping document. This also applies to question No. 35(a).***

34. Does the record include the following:

a. Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)] Yes ___ No ❑ N/A X RMK#___

b. Quantity of each type of universal waste? [3745-273-39(A)(2)] Yes ___ No ❑ N/A X RMK#___

c. Date received? [3745-273-39(A)(3)] Yes ___ No ❑ N/A X RMK#___

35. Is universal waste shipped to another handler? If so: Yes___ No___ N/A X RMK#___

a. Is a record of each shipment kept? [3745-273-39(B)] Yes ___ No ❑ N/A X RMK#___

36. Does the record include the following?

a. Name and address of universal waste handler, destination facility, or foreign destination? [3745-273-39(B)(1)] Yes ___ No ❑ N/A X RMK#___

b. Quantity of each type of universal waste? [3745-273-39(B)(2)] Yes ___ No ❑ N/A X RMK#___

c. Date shipped? [3745-273-39(B)(3)] Yes ___ No ❑ N/A X RMK#___

37. Are records kept for three years? [3745-273-39(C)(1)(2)] Yes X No ❑ N/A ___ RMK#___

EXPORTS

38. Is waste being sent to a foreign destination? If so: Yes ___ No X N/A ___ RMK#___

a. Does the large quantity handler comply with primary exporter requirements in OAC rules 3745-52-53 and 3745-52-57, and paragraphs (A)(1) - (A)(6) and (B) of 3745-52-56? [3745-273-40(A)] Yes ___ No ❑ N/A X RMK#___

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA "Acknowledgment of Consent" 37845-52-50 to -52-57? [3745-273-40(B)] Yes ___ No ❑ N/A X RMK#___

c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)] Yes ___ No ❑ N/A _X_ RMK#___

REMARKS

#2 The batteries were not individually labeled as required.
#3. The stack of baterries was labeled with the accumulation date; however the batteries were not in a container.

DR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] **If so**: Yes X No ❑ N/A ___RMK#___

   a. **For determinations based solely on knowledge of the waste:** Is supporting data retained on-site? [3745-270-07(A)(6)] Yes X No ❑ N/A ___RMK#___

   b. **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes X No ❑ N/A ___RMK#___

2. Has the generator determined each Ohio EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2), see Table 1] Yes X No ❑ N/A ___RMK#___

3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes X No ❑ N/A ___RMK#___

4. Does the generator generate a characteristic hazardous waste? **If so:** Yes X No___ N/A ___RMK#___

   a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes X No ❑ N/A ___RMK#___

NOTE: *If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.*

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] **If so:** Yes X No___ N/A ___RMK#___

   a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes X No ❑ N/A ___RMK#___

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]*

6. Has the generator **correctly** determined if restricted wastes meet or exceed treatment standards? [3745-270-07(A)(1)] Yes X No ❑ N/A ___RMK#___

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

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

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

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] — Yes ❑ No___ N/A X RMK#___

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] **If so:** — Yes___ No X N/A ___RMK#___

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

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

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

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

    a. Has the facility complied with 3745-270-04? — Yes ___ No ❑ N/A X RMK#___

REMARKS

NOTIFICATION AND CERTIFICATION REQUIREMENTS

12. If a generators' waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1? [3745-270-07(A)(2)] — Yes _X_ No ❑ N/A ___ RMK#___

13. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1? [3745-270-07(A)(3)] — Yes ___ No ❑ N/A _X_ RMK#___

14. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1? [3745-270-07(A)(4)] — Yes ___ No ❑ N/A _X_ RMK#___

15. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1? [3745-270-07(A)(9)] — Yes ___ No ❑ N/A _X_ RMK#___

16. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] **If so:** — Yes ___ No X N/A ___ RMK#___

    a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] — Yes ___ No ❑ N/A _X_ RMK#___

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

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

REMARKS

STATE PART B HAZARDOUS WASTE PERMIT INSPECTION CHECKLIST

DIVISION OF HAZARDOUS WASTE MANAGEMENT
OHIO EPA
August 2004

Table of Contents
U.S. DOE - Portsmouth Gaseous Diffusion Plant
04-66-0680

RCRA Inspection Checklist 1

General Conditions of Permit 2
- General Permit Compliance and Activities 2

Permit Modification, Revision, Revocation 5

Site Entry - Availability of Records 7

Recordkeeping Requirements 7
- Confidentiality 7
- Operating Record 7
- Annual Report Requirement 9
- Sampling/monitoring Recordkeeping Requirements 9
- Waste Minimization Requirements 10

Off-site Shipments/manifest Requirements 11
- Manifest Requirements/wastes Received On-site 11

Waste Analysis/waste Analysis Plan 11
- General Requirements 12
- Waste Analysis Quality Assurance Requirements 12

General Inspection Requirements 14

Security Provisions/facility Operation 15

Personnel Training 16

Required Equipment 16

Contingency Plan Requirements 17
- Emergency Procedures 17
- Emergency Authorities 18
- Emergency Coordinator 18
- Amendment of Plan 18
- Implementation of Plan 19

Contingency Plan Requirements 20
- Closure Plan/amendment 20
- Closure Activities 20

Requirements for Ignitable, Reactive or Incompatible Wastes 22

Storage of Hazardous Wastes in Containers 24
- Condition of Containers 25
- Inspections 25
- Containment System 26
- Required Aisle Space 27
- Closure and Post-closure 27
- Container Storage of Residual Waste 27

Land Disposal Restriction Requirements 28
- Prohibition Against Dilution 28
- Generator Requirements 28
- Notification/certification 29
- Storage of Land Disposal Restricted Wastes 31

OHIO PART B PERMITTED FACILITY
RCRA INSPECTION CHECKLIST

Facility: U.S. DOE - Portsmouth Gaseous Diffusion Plant Ohio Permit #: 04-66-0680

Co-operator: Bechtel Jacobs Company LLC

Address: 3930 U.S. Route 23 South
Piketon, OH 45661

USEPA ID#: OH7 890 008 983
Facility Phone: 740-897-5010

County: Pike Time: 8:00 -

Inspection Date: 8/9/04 - 8/11/04

Advance notice of inspection given?___(Yes) X (No)
If so, how far in advance? _____

	Name	***Agency/Title***	***Phone***
Inspector(s):	Walt Francis	U.S. EPA	312-353-4921
	Melody Stewart	Ohio EPA	740-380-5256
Facility	Russell Vranicar	USDOE	740-897-??
	Cliff Beeks	Bechtel Jacobs	740-897-3579
Representative(s):	Mary Williams	Bechtel Jacobs	740-897-5010
	Sandy Childers	Bechtel Jacobs	740-897-2336

Is facility operating as a generator? Yes X No _____

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

PERMIT STATUS

Permit Issued: March 15, 2001
Permit Effective Date: March 15, 2001
Permit Expiration Date: March 15, 2006

STORAGE		TREATMENT		DISPOSAL	
X	Container		Tank		Injection Well
	Tank		Surface Impoundment		Landfill
	Waste Pile		Incinerator		Land Application
	Surface Impoundment		Thermal Treatment		Surface Impoundment

GENERAL CONDITIONS OF PERMIT

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1. Has the expiration date of the permit passed? If so: Yes__No_X_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 _X_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? (Or upon a later date if the permittee can demonstrate good cause for late submittal.) [Condition A.6.(a)] Yes__No__ N/A _X_RMK#___

NOTE: *The permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:*

   A. The permittee has submitted a timely and complete application for a renewal permit under OAC rule 3745-50-40; and

   B. Through no fault of the permittee, a new permit has not been issued pursuant to OAC rule 3745-50-40 on or before the expiration date of the permit. [Condition A.6.(b)]

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.26] Yes_X_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? [Condition A.1.(b) and A.5] Yes__No_X_ N/A ___RMK#___

4. Have any provisions of the permit been identified as invalid? [Condition A.4.] Yes__No_X_ N/A ___RMK#___

5. Has the facility identified any instances of noncompliance with the permit, RC Chapter 3734. or the rules adopted thereunder, which may endanger human health or the environment? If so: Yes__No_X_ N/A ___RMK#___

   a. Did the facility immediately report orally the following to Ohio EPA's Emergency Response Section within 24 hours of becoming aware of the circumstance(s): [Condition A.20.(a)]

i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and — Yes__No__ N/A _X_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 or operator? — Yes__No__ N/A _X_RMK#__

B. Name, address and telephone number of the facility? — Yes__No__ N/A _X_RMK#__

C. Name and quantity of material(s) involved? — Yes__No__ N/A _X_RMK#__

D. The extent of injuries, if any? — Yes__No__ N/A _X_RMK#__

E. An assessment of the actual or potential hazard to the environment and human health outside the facility where this is applicable? — Yes__No__ N/A _X_RMK#__

F. Estimated quantity and disposition of recovered material that resulted from the incident? — Yes__No__ N/A _X_RMK#__

6. Did the permittee provide a written report to Ohio EPA's Emergency Response Section and DHWM, SEDO within five days of the time the permittee became aware of the circumstances reported in Question 5? [Condition A.21.] If so did the report contain: — Yes__No__ N/A _X_RMK#__

a. A description of the noncompliance and its cause (including exact dates and times)? — Yes__No__ N/A _X_RMK#__

b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? — Yes__No__ N/A _X_RMK#__

c. Steps taken or planned to minimize the impact on human health and the environment and to reduce and prevent recurrence of the noncompliance? — Yes__No__ N/A _X_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 becomes aware of the circumstances. [Condition A.21.(c)]*

7.	Has the permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8]	Yes__No__ N/A _X_RMK#__
8.	Has the permittee identified any other instances of noncompliance not provided for in Question 5?	Yes__No__ N/A _X_RMK#__
	a. If so, did the permittee report to the director within a month of the time at which the permittee is aware of such noncompliance? [Condition A.22.]	Yes__No__ N/A _X_RMK#__
	b. Do the reports provided contain the information set forth in Condition A.20?	Yes__No__ N/A _X_RMK#__
9.	Has the permittee planned any physical alterations or additions to the permitted facility?	Yes__No_X_ N/A ___RMK#__
	a. If so, has the facility provided Ohio EPA with notice of such changes? [Condition A.15]	Yes__No__ N/A _X_RMK#__

Note: *Such notification does not waive the permittee's duty to comply with the permit pursuant to Condition A.5.*

REMARKS

PERMIT MODIFICATION, REVISION, REVOCATION

1. Has the permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.] — Yes X No___ N/A ___RMK#___

2. Has the permit been transferred to a new owner or operator? [Condition A.18.] If so, — Yes___No X N/A ___RMK#___

   a. Has the transfer been conducted in accordance with R.C. Chapter 3734. and the rules adopted thereunder? [Condition A.18.]; and — Yes___No___ N/A X RMK#___

   b. Before transferring ownership did the permittee notify the new owner in writing of the requirements of R.C. Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.18.] — Yes___No___ N/A X RMK#___

3. Has the permittee submitted reports of compliance or noncompliance with, or any progress reports on the requirements contained 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 X RMK#___

4. Has the permittee furnished relevant information which Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, or to determine compliance with the permit? [Condition A.10] — Yes X No___ N/A ___RMK#___

5. Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10] — Yes X No___ N/A ___RMK#___

6. 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 HWFB? If so, — Yes___No X N/A ___RMK#___

   a. Has the permittee promptly submitted such facts or corrected information to the appropriate entity? [Condition A.24.] — Yes___No___ N/A X RMK#___

7.	Is the permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications to the application? [Condition A.14.(c)]	Yes_X_No___ N/A ___RMK#___
8.	Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14.(c)]	Yes_X_No___ N/A ___RMK#___

REMARKS

SITE ENTRY - AVAILABILITY OF RECORDS

1. As specified in Condition A.11., has the permittee allowed the director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection, 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 X No ___ N/A ___ RMK#___

   b. Have access to and copy any records required to be kept under the conditions of the permit? — Yes X No ___ N/A ___ RMK#___

   c. Inspect at reasonable times facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit? — Yes X No ___ N/A ___ RMK#___

   d. Sample, document, or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by R.C. Chapter 3734. and the rules adopted thereunder? — Yes X No ___ N/A ___ RMK#___

RECORDKEEPING REQUIREMENTS

CONFIDENTIALITY

1. Has the permittee requested confidentiality of any information of the permit in accordance with R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.25.] — Yes ___ No X N/A ___ RMK#___

OPERATING RECORD

2. Is the permittee maintaining a written operating record at the facility as set forth in OAC rule 3745-54-73 and Condition B.22. of the permit which contains the following elements:

   a. A description and the quantity of each hazardous waste received? — Yes X No ___ N/A ___ RMK#___

   b. Method(s) and date(s) of treatment, storage or disposal at the facility? — Yes X No ___ N/A ___ RMK#___

c. The location of each hazardous waste within the facility and the quantity at each location? Yes X No___ N/A ___RMK#___

3. Is the permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents as part of its operating record: [Condition A.28.]

a. Waste analysis plan in accordance with OAC rule 3745-54-13 and the conditions of the permit? Yes X No___ N/A ___RMK#___

b. Contingency plan in accordance with OAC rule 3745-54-53 and the conditions of the permit? Yes X No___ N/A ___RMK#___

c. Closure plan in accordance with OAC rule 3745-55-12 and the conditions of the permit? Yes X No___ N/A ___RMK#___

d. Personnel training plan and records required by OAC rule 3745-54-16 and the conditions of the permit? Yes X No___ N/A ___RMK#___

e. Inspection schedules developed in accordance with OAC rules 3745-54-15 and 3745-55-74 and the conditions of the permit? Yes X No___ N/A ___RMK#___

4. Have any of the documents identified in Question #3 been revised as required by the permit? If so, Yes X No___ N/A ___RMK#___

a. Has the permittee submitted the revisions to Ohio EPA? [Condition A.28.(b)] Yes X No___ N/A ___RMK#___

b. Has the permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.28.(b)] Yes X No___ N/A ___RMK#___

5. Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from the date of inspection? [Condition A.28.(c)] Yes X No___ N/A ___RMK#___

ANNUAL REPORT REQUIREMENT

6. 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 and the conditions of the permit? [Condition B.25.] Yes X No__ N/A ___RMK#__

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

7. In compliance with Condition A.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 X No__ N/A ___RMK#__

   b. Individual(s) who performed the sampling or measurement? Yes X No__ N/A ___RMK#__

   c. Date(s) analyses were performed? Yes X No__ N/A ___RMK#__

   d. Individual(s) who performed the analyses? Yes X No__ N/A ___RMK#__

   e. Analytical technique(s) or method(s) used? Yes X No__ N/A ___RMK#__

   f. Results of such analyses? Yes X No__ N/A ___RMK#__

8. 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 A.12.(a)] Yes X No__ N/A ___RMK#__

9. Has Ohio EPA requested submittal of any reports or other information required by the conditions of the permit from the permittee? If so, Yes__ No X N/A ___RMK#__

   a. Have the submittals been signed and certified according to OAC rules 3745-50-58(K) and 3745-50-42? [Condition A.13.] Yes__ No__ N/A X RMK#__

WASTE MINIMIZATION REQUIREMENTS

10. Has the permittee submitted a Waste Minimization Report to Ohio EPA meeting the requirements of Condition A.29. of the permit within 180 days of permit journalization? Yes X No___ N/A ___RMK#___

    a. Following the first submittal as identified above in Question #10, has the permittee submitted biennial updates to this report as required by Condition A.29.(c)? Yes X No___ N/A ___RMK#___

REMARKS

OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS

1. Is all hazardous and mixed waste transported from the facility by a properly registered transporter of hazardous and mixed waste in accordance with all applicable laws, rules and standards? [Condition A.16.] — Yes X No ___ N/A ___ RMK#___

MANIFEST REQUIREMENTS/WASTES RECEIVED ON-SITE

2. Upon receipt of the manifests, has the permittee signed and dated each copy of the manifest? [OAC 3745-54-71(A)(1); Condition B.24.] — Yes X No ___ N/A ___ RMK#___

3. For any significant discrepancies identified upon receipt of the manifest(s): did the permittee note such discrepancies on the manifest(s) in accordance with OAC rule 3745-54-71(A)(2) and Condition B.24? — Yes ___ No ___ N/A X RMK#___

   a. Did the permittee attempt to reconcile the discrepancy? [Condition B.24.] — Yes ___ No ___ N/A X RMK#___

   b. If the discrepancy was not resolved within 15 days: did the permittee submit a report, including a copy of the manifest, to the director in accordance with OAC rule 3745-54-72(B)? [Condition B.24.] — Yes ___ No ___ N/A X RMK#___

4. Does the permittee immediately give the transporter at least one copy of the signed manifest? [OAC 3745-54-71(A)(3); Condition B.24.] — Yes X No ___ N/A ___ RMK#___

5. Does the permittee provide the generator with a copy of the manifest within 30 days of receipt of waste on-site? [OAC 3745-54-71(A)(4); Condition B.24.] — Yes X No ___ N/A ___ RMK#___

6. Does the permittee retain a copy of each manifest on-site for at least three years from the date of delivery? [OAC 3745-54-71(A)(5); Condition B.24.] — Yes X No ___ N/A ___ RMK#___

7. Has the permittee received any hazardous waste or mixed waste from off-site, other than as described in Condition B.2(b)? — Yes ___ No X N/A ___ RMK#___

WASTE ANALYSIS/WASTE ANALYSIS PLAN

GENERAL REQUIREMENTS

1. Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information which is necessary to properly treat, store or dispose of the waste in accordance with OAC Chapters 3745-54 to 3745-57 and Condition B.3 of the permit (Section C of the approved permit application)? [OAC 3745-54-13(A)(1)] — Yes X No__ N/A ___RMK#___

2. Since the last inspection, were any wastes generated by the facility which were unable to be characterized through process knowledge? If so, — Yes__No X N/A ___RMK#___

   a. Were the waste analysis procedures described in Section C of the approved permit application followed? — Yes__No__ N/A X RMK#___

3. Is the permittee following the procedures described in the approved waste analysis plan (Section C of approved permit application) and the requirements of OAC rule 3745-54-13? [Condition B.3.] — Yes X No__ N/A ___RMK#___

4. Is the permittee maintaining waste analysis data in the facility's operating record as required by OAC rule 3745-54-73 and Condition B.22. of the permit? — Yes X No__ N/A ___RMK#___

WASTE ANALYSIS QUALITY ASSURANCE REQUIREMENTS

5. Is the permittee verifying the analysis of each waste stream annually as part of its quality assurance program in accordance with SW-846? [Condition B.3.] — Yes X No__ N/A ___RMK#_

6. In accordance with Condition B.3. of the permit, does the permittee's quality assurance plan ensure that the permittee is, at a minimum:

   a. Maintaining property functional instruments? — Yes X No__ N/A ___RMK#___

   b. Using approved sampling/analytical methods? — Yes X No__ N/A ___RMK#___

   c. Verifying the validity of sampling and analytical procedures and performance of correct calculations? — Yes X No__ N/A ___RMK#___

7.	If the permittee uses a contract laboratory to perform analyses, did the permittee inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this permit?	Yes X No___ N/A ___RMK#___

REMARKS

GENERAL INSPECTION REQUIREMENTS

1. Is the permittee following the inspection procedures and schedules described in Section F of the approved permit application and the requirements of OAC rule 3745-54-15? [Condition B.5.] — Yes__ No_X_ N/A ___RMK#_1_

2. Does the permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [OAC 3745-54-15(A)(1)(2)] — Yes_X_No___ N/A ___RMK#___

3. 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? — Yes_X_No___ N/A ___RMK#___

   a. Is the schedule kept at the facility? [OAC 3745-54-15(B)(2)] — Yes_X_No___ N/A ___RMK#___

   b. Does the schedule identify the types of problems which are to be looked for during the inspection? [OAC 3745-54-15(B)(3)] — Yes_X_No___ N/A ___RMK#___

   c. Does the schedule include inspection of areas subject to spills daily when in use and according to other applicable regulations when not in use? [OAC 3745-54-15(B)(4)] — Yes_X_No___ N/A ___RMK#___

4. 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_X_No___ N/A ___RMK#___

5. Is the permittee maintaining records of inspections for a minimum of three years? [Condition B.5.] — Yes_X_No___ N/A ___RMK#___

6. 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_X_No___ N/A ___RMK#___

   b. Signature of inspector? — Yes_X_No___ N/A ___RMK#___

   c. Notation of observations made? — Yes_X_No___ N/A ___RMK#___

d. Date/nature of any repairs or other remedial actions? Yes X No__ N/A ___RMK#___

SECURITY PROVISIONS/FACILITY OPERATION

1. Is the permittee complying with the security provisions of OAC rule 3745-54-14(B)(1) and B(2) and (C) and Section F of the approved permit application, including the following: [Condition B.4.]

   a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility; Yes X No__ N/A ___RMK#___

   b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility; or Yes X 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 X No__ N/A ___RMK#___

2. In accordance with OAC rule 3445-54-14(C), does the permittee have signs reading "Danger-Unauthorized Personnel Keep Out" posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? [Condition B.4.] Yes X No__ N/A ___RMK#___

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 waters? [Condition B.1.] Yes X No__ N/A ___RMK#___

REMARKS

RMK #1 - Building X-326 L Cage, inspector unable to view certain containers during weekly inspections.

PERSONNEL TRAINING

1. Is the facility conducting personnel training in accordance with Section H of the approved permit application and the following requirements of OAC rule 3745-54-16: [Condition B.6.]

   a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC 3745-54-16(A)(B)(C)] — Yes X 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 3745-54-16(B)? — Yes X No___ N/A ___RMK#___

   c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(B)? — Yes___ No X N/A ___RMK# 1

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 X No___ N/A ___RMK#___

REQUIRED EQUIPMENT

1. Is the permittee, at a minimum, maintaining the equipment set forth in the approved permit application (Section G) at the facility? [Condition B.9.] — Yes X No___ N/A ___RMK#___

2. Is the permittee inspecting, testing, and maintaining the equipment specified in Question #1 to assure its proper operation as specified in OAC rule 3745-54-33, the inspection plans and Section G of the approved permit application? [Condition B.10.] — Yes X 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 Section G of the approved permit application? [Condition B.11.] — Yes X No___ N/A ___RMK#___

CONTINGENCY PLAN REQUIREMENTS

EMERGENCY PROCEDURES

1. In compliance with Condition B.13.(a) of the permit, does the permittee:

   a. Familiarize the emergency response agencies likely to respond to an emergency at the facility with:

      i. The location and layout of the facility? Yes X No__ N/A ___RMK#___

      ii. Properties of hazardous waste and mixed waste managed at the facility and associated hazards? Yes X No__ N/A ___RMK#___

      iii. Places where facility personnel will normally be working? Yes X No__ N/A ___RMK#___

      iv. Entrances to and roads inside the facility? Yes X No__ N/A ___RMK#___

      v. Evacuation routes as depicted in Section G of the permit application? Yes X No__ N/A ___RMK#___

   b. Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the facility, and any further requirements imposed by the permit?; and Yes X No__ N/A ___RMK#___

   c. Familiarize local police and fire departments, local hospitals and other local emergency services with the properties of hazardous waste and mixed waste managed at the facility and the types of injuries which could result from fires, explosions or a release of hazardous wastes at the facility? Yes X No__ N/A ___RMK#___

2. Is the permittee in compliance with the requirements of OAC rule 3745-54-56 and Section G of the approved permit application regarding emergency procedures? [Condition B.20.] Yes X No__ N/A ___RMK#___

EMERGENCY AUTHORITIES

3. 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_X_ 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 _X_RMK#___

4. 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.] — Yes_X_No__ N/A ___RMK#___

5. Has the permittee notified the agencies in Question #4, in writing, within ten days of the effective date of any amendments or revisions to the Plan? [Condition B.18.(b)] — Yes_X_No__ N/A ___RMK#___

6. 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 in accordance with OAC rule 3745-54-53? [Condition B.18.(c)] — Yes_X_No__ N/A ___RMK#___

EMERGENCY COORDINATOR

7. Is the permittee in compliance with the requirements of OAC rule 3745-54-55 with regard to the emergency coordinator? [Condition B.19.] — Yes_X_No__ N/A ___RMK#___

AMENDMENT OF PLAN

8. Is the permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17.] — Yes_X_No__ N/A ___RMK#___

Note: *Also see Question #4 of RECORDKEEPING REQUIREMENTS to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.*

IMPLEMENTATION OF PLAN

9. Has there been a fire, explosion or release of hazardous waste or mixed waste or constituents at the facility since the last date of inspection as described by Condition B.14. of the permit? If so, — Yes__No_X_ 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? [Condition B.14.] — Yes__No__ N/A _X_RMK#___

   b. Did the permittee collect and manage released material, emergency response material and by-products as hazardous waste or mixed waste until making a demonstration to Ohio EPA that such materials are not subject to Ohio hazardous waste rules? [Condition B.16.] — Yes__No__ N/A _X_RMK#___

   c. 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 _X_RMK#___

      i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23.] ***Note:*** *See also Conditions A.21. and A.22. of the permit for additional reporting/recordkeeping requirements.* — Yes__No__ N/A _X_RMK#___

   d. 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? [Condition B.23.] — Yes__No__ N/A _X_RMK#___

REMARKS

CONTINGENCY PLAN REQUIREMENTS

CLOSURE PLAN/AMENDMENT

1. Is the permittee maintaining at the facility, the approved closure plan which contains the elements set forth in OAC rule 3745-55-12? [Condition B.29.] — Yes X No___ N/A ___RMK#___

2. Has the permittee amended the closure plan? If so, — Yes___No X N/A ___RMK#___

   a. Has the plan been amended in accordance with OAC rule 3745-55-12(C)? [Condition B.28.] — Yes___No___ N/A _X_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.*

CLOSURE ACTIVITIES

3. Has the permittee closed the facility? If so, — Yes___No X N/A ___RMK#___

   a. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26.] — Yes___No___ N/A _X_RMK#___

   b. Did the permittee carry-out the approved closure plan as set forth in the permit application and terms and conditions of the permit? [Condition B.26.] — Yes___No___ N/A _X_RMK#___

   c. After receiving the final volume of hazardous waste, did the permittee remove from the facility all hazardous waste and mixed 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 _X_RMK#___

   d. 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 _X_RMK#___

   e. Did the permittee notify Ohio EPA's Southeast District Office within five working days prior to all rinseate and soil sampling? [Condition B.32.(b)] — Yes___No___ N/A _X_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 _X_RMK#__

REMARKS

REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

1. Is the permittee following the procedures as specified in OAC rules 3745-54-17, 3745-55-77 and Section F of the approved application when managing ignitable, reactive and/or incompatible wastes? [Conditions B.7.(a) and C.10. and C.11.] Yes X No___ N/A ___RMK#___

2. Does the permittee ***not*** store incompatible waste ***except*** in accordance with OAC rules 3745-54-17(B) and 3745-55-77, and the terms and conditions of this permit? [Condition C.11.(a)] Yes X No___ N/A ___RMK#___

3. Does the permittee take precautions to prevent placing hazardous waste or mixed waste in an unwashed container that previously held an incompatible waste or material? [Condition C.11.(b)] Yes X No___ N/A ___RMK#___

4. Does the permittee ensure that all containers of incompatible wastes are physically separated from other incompatible wastes or materials by a wall, berm, dike, or other device in accordance with OAC rule 3745-55-77 and the Appendix to OAC rule 3745-55-99? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

   a. Are all containers of aqueous hazardous acids (ph $\leq$ 2) and caustics ph $\geq$ 12.5) sorted on different pallets and physically separated in different rooms? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

   b. Are aqueous acids and caustics in poly bottles, and other containers requiring nuclear criticality safety spacing physically separated in the same room by a dike? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

   c. Are containers of cyanides and sodium metals being stored in rooms physically separate from other incompatible wastes or other incompatible materials? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

5. Does the permittee provide electrical grounding for all containers, tanks and transport vehicles during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(b)] Yes X No___ N/A ___RMK#___

6.	Does the permittee provide and require the use of spark proof tools during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(c)]	Yes X No___ N/A ___RMK#___
7.	Does the permittee prohibit smoking and open flames in areas where hazardous wastes are managed and post appropriate signs? [Condition B.7.(d)]	Yes X No___ N/A ___RMK#___
8.	As required by OAC rule 3745-55-76, does the permittee store containers of ignitable or reactive wastes greater than 15 meters (50 feet) away from the Portsmouth Gaseous Diffusion Plant reservation boundary? [Condition C.10.(a)]	Yes X No___ N/A ___RMK#___

REMARKS

STORAGE OF HAZARDOUS WASTES IN CONTAINERS

NOTE: *The requirements of permit 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.*

1.	Is the permittee storing in containers, only those wastes as specified in Section A of the Part B permit application? [Condition C.1.(a), C.2.]	Yes X No___ N/A ___RMK#___
2.	Does the permittee limit the total quantity of containerized waste in the container storage area to 133,000 gallons at any given time in the permitted container areas, located in building X-326 and no more than 5,456,000 gallons at any given time in the permitted storage areas located in building X-7725? [Condition C.1.(a)]	Yes X No___ N/A ___RMK#___

NOTE: *For the purposes of compliance with the capacity limitation of the permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity. For example, a 55-gallon drum will be considered to be holding 55 gallons of waste, regardless of the actual quantity stored in the drum. [Condition C.1.(b)]*

3.	When accumulating waste within the permitted X-7725 and X-326 container storage area, does the permittee ensure that the total amount of waste (both > 90 days and < 90 days) does not exceed the maximum container storage inventory established under Condition C.1.? [Condition C.1.(c)]	Yes X No___ N/A ___RMK#___
4.	Are hazardous wastes subject to regulation by the permit stored only at the designated container storage area described in the approved permit application? (See Section D of the permit application) [Condition C.1.(a)]	Yes X No___ N/A ___RMK#___
5.	Is each container stored clearly marked to identify its contents and the date each period of accumulation/storage begins? (See Section D of the permit application) [Condition C.3.]	Yes X No___ N/A ___RMK#___
6.	Does the permittee store hazardous waste in the types of containers described in Section D of the approved permit application? [Condition C.1.(a)]	Yes X No___ N/A ___RMK#___

CONDITION OF CONTAINERS

8. Are containers holding hazardous wastes in good condition? [Condition C.3.] — Yes X No ___ N/A ___ RMK#___

   a. If not, (e.g., severe rusting, structural defects) did the permittee transfer the hazardous waste from such a container to a container that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit and OAC rule 3745-55-71? [Condition C.3.] — Yes ___ No ___ N/A X RMK#___

9. 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 C.4.] — Yes X No ___ N/A ___ RMK#___

10. Is storage conducted in the container storage containment system as described in Condition C.1. of the permit and Section D of the approved permit application? [Condition C.5.(a)] — Yes X No ___ N/A ___ RMK#___

11. 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 C.5.(b)] — Yes X No ___ N/A ___ RMK#___

12. Are lab-pack wastes handled in compliance with applicable storage requirements? [Condition C.5.(c)] — Yes X No ___ N/A ___ RMK#___

13. Are lab-pack wastes packaged in drums containing absorbent material that is compatible with the wastes? [Condition C.5.(d)] — Yes X No ___ N/A ___ RMK#___

INSPECTIONS

14. Is the permittee inspecting the container area weekly in accordance with OAC rules 3745-54-15, and 3745-54-73 and the approved inspection schedule (Section F) to detect leaking containers and deterioration of containers and the containment system? [Condition C.8.] — Yes X No ___ N/A ___ RMK#___

   a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken? [Condition C.8.] — Yes X No ___ N/A ___ RMK#___

b. On days when containerized waste are added or removed to and/or from any of the permitted areas for storage, does the permittee conduct inspections as described in Section F of the approved Part B permit application and maintain the inspection results in the facility operating record? [Condition C.8.] Yes X No__ N/A ___RMK#___

CONTAINMENT SYSTEM

15. Does the permittee maintain the containment system as described in Section D of the approved Part B permit application, including: [Condition C.6.] Yes X No__ N/A ___RMK#___

a. Sufficient design to contain 10% of the total volume of the containers or the volume of the largest container, whichever is greater? [Condition C.6.(b)] Yes X No__ N/A ___RMK#___

b. A system which is free of gaps and sufficiently impervious to contain leaks and spills? Yes X No__ N/A ___RMK#___

c. Equipped with a coating which is compatible with each waste stored in the area? Yes X No__ N/A ___RMK#___

d. *For those wastes which are deemed incompatible with liner material:* Has the permittee installed a separate secondary containment structure within the existing structure which is equipped with a compatible liner? Yes__No__ N/A _X_RMK#___

16. Has the permittee had a spill or leak of wastes or an accumulation of precipitation in the containment system? If so, Yes__No X_ N/A ___RMK#___

a. Are spilled or leaked wastes and accumulated precipitation removed from the sump or collection area in a timely manner? [Condition C.6.(c)] Yes__No__ N/A _X_RMK#___

b. Does removal of spilled/leaked wastes and accumulated precipitation occur within 24 hours from the time the spill or leak waste is discovered? [Condition C.6.(c)] Yes__No__ N/A _X_RMK#___

REQUIRED AISLE SPACE

17. Is the permittee maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in the event of an emergency to any area of the facility as required by OAC rule 3745-54-35? [Condition B.12.] — Yes X No__ N/A ___RMK#___

CLOSURE AND POST-CLOSURE

18. At closure of the container storage area, did the permittee remove all hazardous waste, hazardous waste residues, mixed waste and mixed waste residues from the containment system, in accordance with the procedures set forth in the approved closure plan (Section I of the permit application)? [Condition C.13.(a)] — Yes__No__ N/A _X_RMK#___

19. During closure, if the permittee could not demonstrate that all contaminated soils could be removed, did the permittee close the unit and perform post-closure care following a plan approved by Ohio EPA? [Condition C.13.(b)] — Yes__No__ N/A _X_RMK#___

CONTAINER STORAGE OF RESIDUAL WASTE

20. Is the permittee complying with the provisions of Section C-2E of the application as amended pursuant to Condition B.2.(b) of this permit? — Yes X No__ N/A ___RMK#__

LAND DISPOSAL RESTRICTION REQUIREMENTS

PROHIBITION AGAINST DILUTION

1. Has the permittee updated the annual Federal Facility Compliance Act Schedule? [OAC rule 3745-270-50; Condition B.36.] — Yes X No ___ N/A ___ RMK#___

2. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [OAC rule 3745-270-40 through 49; Condition B.36.(c)] — Yes ___ No X N/A ___ RMK#___

   a. As a substitute for adequate treatment to achieve compliance with LDR treatment standards? — Yes ___ No ___ N/A X RMK#___

   b. To circumvent the effective date of a prohibition (e.g., to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)? — Yes ___ No ___ N/A X RMK#___

   c. To otherwise avoid a prohibition in OAC rule 3745-270-30 through -39? — Yes ___ No ___ N/A X RMK#___

   d. To otherwise avoid a prohibition imposed by Section 3004(d) of RCRA? — Yes ___ No ___ N/A X RMK#___

NOTE: *If the answer to any of Questions 2(a) through 2(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of OAC rule 3745-270-03 [Condition B.36.]. Dilution of wastes is permissible under some conditions. See OAC rule 3745-270-03(B).*

GENERATOR REQUIREMENTS

3. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No ___ N/A ___ RMK#___

   a. ***For determinations based solely on knowledge of the waste***: Is supporting data used to make this determination being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No ___ N/A ___ RMK#___

   b. ***For determinations based upon analytical testing***: Is a copy of waste analysis data being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No ___ N/A ___ RMK#___

4. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g., wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [OAC rule 3745-270-07; Condition B.36.(e)] Yes X No___ N/A ___RMK#___

5. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [OAC rule 3745-270-07(A); Condition B.36.(e)] Yes X No___ N/A ___RMK#___

6. Does the entity generate any listed waste(s) which are restricted from land disposal? If so, Yes X No___ N/A ___RMK#___

   a. Do such wastes also exhibit hazardous waste characteristics as identified in OAC rules 3745-51-20 to 3745-51-24? Yes X No___ N/A ___RMK#___

   b. ***For listed wastes which also exhibit a characteristic*:** Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [OAC rule 3745-270-09(A)] Yes X No___ N/A ___RMK#___

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC rule 3745-270-09(B)].*

NOTIFICATION/CERTIFICATION

7. ***For wastes that do not meet treatment standards:*** Has the generator submitted a one-time written notice to the treatment/storage facility receiving the wastes, that wastes being received do not meet treatment standards? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No___ N/A ___RMK#___

   If so, does the notice including the following:

   a. EPA hazardous waste number? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No___ N/A ___RMK#___

   b. Appropriate treatment standard for the waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No___ N/A ___RMK#___

c. The manifest number associated with the first shipment of waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No__ N/A ___RMK#__

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No__ N/A ___RMK#__

e. Applicable wastewater/non-wastewater category [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No__ N/A ___RMK#__

f. For hazardous debris, list the contaminants subject to treatment, as described in paragraph (B) of OAC rule 3745-270-45; and an indication that these contaminants are being treated to comply with OAC rule 3745-270-45. — Yes X No__ N/A ___RMK#__

g. For contaminated soil list the constituents subject to treatment as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. — Yes X No__ N/A ___RMK#__

8. ***For wastes that meet treatment standards:*** Does the generator submit a one-time written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__No__ N/A _X_RMK#__

If so, does the notice/certification including the following:

a. EPA hazardous waste identification number? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__No__ N/A _X_RMK#__

b. The corresponding treatment standards and applicable prohibitions for the waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__No__ N/A _X_RMK#__

c. The manifest number associated with the shipment of waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__No__ N/A _X_RMK#__

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes__No__ N/A _X_RMK#__

e. Is the certification signed by the generator or an authorized representative? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes__No__ N/A _X_RMK#__

f. For contaminated soil list the constituents subject to treatment as described as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. Yes__No__ N/A _X_RMK#__

9. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years? [OAC rule 3745-270-07(A)(8); Condition B.36.(j)] Yes_X_No__ N/A ___RMK#__

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

NOTE: *The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate LDR wastes that do not meet treatment standards in tanks or containers. A LQG who stores LDR wastes on-site for greater than 90 days becomes a operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.*

NOTE: *The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [OAC rule 3745-270-50(E); 40 CFR 268.50(e)]*

10. Is the owner/operator storing LDR restricted wastes in containers? If so, is each container marked with the following information in accordance with OAC rule 3745-270-50(A)(2)(a) [Condition B.36(l)] Yes_X_No__ N/A ___RMK#__

a. The identification of the contents? Yes_X_No__ N/A ___RMK#__

b. The date which accumulation began? Yes_X_No__ N/A ___RMK#__

NOTE: *A TSD facility may store LDR wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [OAC rule 3745-270-50(B)]. During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.*

11. Are LDR wastes being stored at the facility for greater than one year? If so,

    a. Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [OAC rule 3745-270-50(B); Condition B.36(m)] Yes X No___ N/A ___RMK#___

OH7 890 008 983

WASTREN, Inc.

3930 US Route 23 South
Bldg. X-3012
P.O. Box 307
Piketon, OH 45661
Office (740) 897-4319
Fax (740) 897-2112
www.wastren.com

July 2, 2004
In Reply Refer to: MJN/PORTS-116/0704

Ms. Jackie France
Bechtel Jacobs Company LLC
P.O. Box 900
Piketon, Ohio 45661

Subject: Base Contract, Technical Specification 10060, Environmental Sustainability Plan

Dear Ms. France:

Attached for your review and comments is a draft of the Portsmouth Gaseous Diffusion Plant (PORTS) Environmental Sustainability Plan formerly known as the **PORTS Pollution Prevention Plan.** In addition to the normal personnel that you would have reviewing the document; would you please distribute the document to the members of PORTS' P2 Advisory Council for their review.

If you have any questions regarding the above document please direct them to Mitch Newman at extension 3827.

Sincerely,

MJ Newman for

Douglas E. Collins
Waste Management Manager

mlw:MJN:DEC

Attachment

cc: Sara Blume, *WASTREN*, Inc. (w/o attachment)
File – Waste Management – RC

PORTS Environmental Sustainability Plan

Date Issued — June 23, 2004

Prepared by

WASTREN, INC.
P.O. Box 307, Piketon, Ohio, 45661
under subcontract 23900-SC-SM046F

SHAW ENVIRONMENTAL, INC.
5050 Section Avenue
Cincinnati, Ohio 45212

Prepared for the
U.S. Department of Energy
Office of Environmental Management

BECHTEL JACOBS COMPANY LLC
managing the
Environmental Management Activities at the
East Tennessee Technology Park
Oak Ridge Y-12 Plant Oak Ridge National Laboratory
Paducah Gaseous Diffusion Plant Portsmouth Gaseous Diffusion Plant
under contract DE-AC05-98OR22700
for the
U.S. Department of Energy

Table of Contents

List of Acronyms iv
Executive Summary ES-1
1.0 Introduction 1
1.1 Purpose 1
1.2 Scope and Applicability 2
1.3 Site Description 2
1.4 PORTS Mission 2
1.5 Environmental Policy Statement 3
2.0 Regulatory Background 3
2.1 Federal Environmental Regulations 3
2.2 Greening the Government Executive Orders 4
2.3 DOE Orders 5
2.4 DEAR Clause 970.5223-2 Acquisition and Use of Environmentally Preferable Products and Services 5
3.0 Roles and Responsibilities 6
3.1 DOE PPPO Environmental Sustainability Coordinator 6
3.2 Management and Integration Contractor - BJC 6
3.3 WASTERN ESP Program Manager 6
3.4 Pollution Prevention Advisory Council 7
3.5 Green Acquisition Advocates 8
3.6 PORTS Employees 8
4.0 ESP Goal Development 9
4.1 DOE Departmental Goal Summary 9
4.2 ESP Objectives 11
4.3 ESP Strategy 12
5.0 Overview of PORTS Environmental Sustainability Program 13
5.1 Managing and Planning Resources/Budget 13
5.2 ESP Training and Continuing Education 13
5.3 Promoting ESP Awareness 14
5.3.1 Publicity, Information Exchange, and Employee Suggestion Program 14
5.3.2 Incentives Program 16
5.3.3 Public Outreach 16

Table of Contents (continued)

5.4 Tracking and Reporting 16
5.4.1 Tracking 16
5.4.2 Reporting 17
5.5 ESP Program Implementation 17
5.5.1 Environmentally Preferable Purchasing and Material/Inventory Control 17
5.5.2 Waste Minimization Program and Hazardous Material Management 18
5.5.2.1 Hazardous Material Approval and Tracking 18
5.5.2.2 Recycle and Reuse Programs 19
5.5.3 Aspect and Impact Analysis – P2 Opportunity Assessments 20
5.5.4 Ozone Depleting Substances 20
5.5.5 Energy and Water Conservation 21
5.5.6 Sustainable Design 22
5.6 Updating the Plan 22
6.0 References 22

List of Acronyms

AIA	Aspect and Impact Analysis
BJC	Bechtel Jacobs LLC
CY	Calendar Year
DOE	Department of Energy
E2	energy efficiency
EAMS	Excess Asset Management System
EMS	Environmental Management System
EO	Executive Order
EPCRA	Emergency Planning and Community Right-to-Know Act
ES	Environmental Sustainability
FEMP	Federal Energy Management Program
GET	General Employee Training
HQ	Headquarters
M&I	Management and Integration
ODS	Ozone-depleting substance
OFEE	Office of Federal Environmental Executive
P2	pollution prevention
P2/WMin	pollution prevention/waste minimization
PORTS	Portsmouth Gaseous Diffusion Plant
PPPO	Portsmouth/Paducah Project Office
PPIC	Pollution Prevention Information Clearinghouse
PPOA	Pollution Prevention Opportunity Assessment
PWTARS	PORTS Waste Tracking and Reporting System
RCRA	Resource Conservation and Recovery Act
RFD	Request for Disposal
SARA	Superfund Amendments and Reauthorization Act
SODI	Southern Ohio Development Initiative
TSCA	Toxic Substance Control Act
USEC	United States Enrichment Corporation
USEPA	United States Environmental Protection Agency
WM	Waste Management

Executive Summary

To be Developed

1.0 Introduction

PORTS is committed to reducing environmental risks, costs, wastes, and future liability by effectively integrating environmental sustainability principles into PORTS activities in a cost effective and environmentally conscious manner. The environmental sustainability program is a balanced, holistic approach linking planning, budgeting, measuring, and improving PORTS overall environmental performance to specific goals and outcomes. The PORTS approach is described in this Environmental Sustainability (ES) Plan and integrates the tenets of an environmental management system (EMS). The PORTS EMS will be the overriding environmental management document and includes successive, independent programs that emphasize environmental protection. The ES Plan is one such document and supercedes the PORTS Site Pollution Prevention Plan. The PORTS ES Program includes elements on pollution prevention (P2), waste minimization, affirmative procurement, sustainable design, and energy and water efficiency.

1.1 Purpose

The ES Plan establishes the requirements of the program as well as defines goals, establishes roles and responsibilities, and promotes the concepts, methods, and philosophies regarding ES at PORTS. The plan is to be used as a reference tool to guide managers, operations personnel, engineers, and support staff in matters concerning ES. The Plan was developed in response to the PORTS Environmental Policy Statement.

The ES Plan complies with the Pollution Prevention Act of 1990, the Resource Conservation and Recovery Act (RCRA), the Superfund Amendments and Reauthorization Act, and Ohio's Administrative Code and Ohio's Prevention First. In addition, the ES Plan also complies with PORTS RCRA Part B Permit requirements and the following Executive Orders (EO) and U.S. Department of Energy (DOE) Orders:

- EO 13101, "*Greening the Government Through Waste Prevention, Recycling, and Federal Acquisition,*"
- EO 13148, "*Greening the Government through Leadership in Environmental Management*
- DOE Order 450.1 "*Environmental Protection Program*"

Section 2.0 describes other legal documents that require a facility to have a pollution prevention/waste minimization (P2/WMin) plan.

1.2 Scope and Applicability

This plan applies to all waste generating operations and associated personnel within DOE-managed facilities at PORTS. Subcontractors at PORTS must meet the requirements of DOE Order 450.1 and this plan through contractual obligations administered by the Bechtel Jacobs Company LLC (BJC) Manager of Projects. BJC and Subcontractors at PORTS are moving towards meeting the full requirements of DOE Order 450.1 and have every intention of meeting the December 31, 2005 EMS implementation date.

1.3 Site Description

PORTS is located in south central Ohio, approximately 20 miles north of Portsmouth, Ohio and 70 miles south of Columbus, Ohio. The site is situated on a 3,700-acre federal reservation approximately four miles south of the village of Piketon.

Construction of PORTS began in late 1952 to expand the federal government's gaseous diffusion program already in place at Oak Ridge, Tennessee and Paducah, Kentucky. The facility was built to increase production of enriched uranium at rates substantially above the other two facilities, because highly-enriched uranium was required for use in nuclear submarine reactors, and low-enriched uranium was needed for commercial nuclear power plants. The first process cell went online in September 1954. A gas centrifuge uranium enrichment program was initiated in the early 1980s. However, full operation was never implemented for the centrifuge process.

1.4 PORTS Mission

PORTS has two official missions. The first mission was uranium enrichment by a gaseous diffusion process. In July 1993, the United States Enrichment Corporation (USEC), a government corporation formed under the Energy Policy Act of 1992, assumed operations of the production portion of the plant.

In June 2000, USEC announced that it intended to close the production portion of PORTS by June 2001 for financial reasons. Shortly thereafter, in October 2000, DOE announced its intent to implement a plan to keep the production plant in cold standby for five years, for possible restart in the event of a significant disruption in the nation's supply of enriched uranium. The plan calls for DOE to retain many of the plant operations, maintenance, utility, and support personnel to maintain the facility in standby status.

The second mission is to remediate contaminated soils and waters from past operating practices and to properly treat and dispose of its legacy wastes. The Department of Energy retained responsibility for the environmental restoration and related waste management activities. These activities focus on environmental remediation efforts; environmental compliance; storage treatment and/or disposition of waste; and the decommissioning of inactive and surplus facilities. The PORTS ES Program supports this second mission by providing information and guidance to perform remedial activities in a cost-effective and safe manner.

1.5 Environmental Policy Statement

The Portsmouth/Paducah Project Office (PPPO) signed a revised Environmental Policy Statement on April 22, 2004. The Policy Statement commits PORTS to being a leader in environment stewardship, to conduct its operations in a manner that protects human health and the environment, and to be in full compliance with environmental laws, regulations, and other requirements. In order to accomplish these goals, the PORTS approach is to systematically and fully integrate environmental considerations into the planning and execution of work at all levels through the development and implementation of an EMS.

2.0 Regulatory Background

2.1 Federal Environmental Regulations

PORTS must comply with numerous federal environmental regulations. The federal regulations affecting the ES Program are discussed briefly below.

The 1976 Resource Conservation and Recovery Act (RCRA) requires hazardous waste generators to establish and implement a program to reduce the volume and toxicity of waste to the degree determined by the generator to be "economically practicable." Hazardous waste generators must certify the existence of a waste minimization program by signing a statement to that effect on hazardous waste manifests. RCRA also requires generators to identify efforts undertaken during the year to reduce the volume and toxicity of wastes generated from their facility in a biennial report to the U.S. Environmental Protection Agency (USEPA). In 1995, RCRA was amended and in Section 6002 Congress added an additional requirement that Federal agencies must promote recycling by establishing preference programs to procure products containing recovered materials.

The Emergency Planning and Community Right-to-Know Act (EPCRA) establishes requirements for the management of toxic and hazardous substances and for implementing waste

minimization. EPCRA provisions help increase the public's knowledge and access to information on chemicals at individual facilities, their uses, and releases into the environment.

EPCRA has four major provisions:

- Emergency planning (Section 301-303)
- Emergency release notification (Section 304)
- Hazardous chemical storage reporting requirements (Sections 311-312), and
- Toxic chemical release inventory (Section 313).

The Pollution Prevention Act of 1990 establishes a national policy that stresses P2, source reduction, and recycling. The Act states that only after those alternatives have been considered or implemented should disposal occur, and then in a manner that minimizes the total quantity and releases to the environment.

2.2 Greening the Government Executive Orders

In addition to the federal regulations described above, PORTS must also be in compliance with the following three Greening the Government Executive Orders while implementing the ES Program.

EO 13101, Greening the Government through Waste Prevention, Recycling, and Federal Acquisition (September 1998) expands the Federal government's commitment to recycling.and buying recycled content and environmentally preferable products, including biobased products. The Order also stipulates that executive agencies must incorporate waste prevention and recycling into daily operations. Three prevention methods listed, in order of preference, are source reduction, recycling, and treatment in an environmentally safe manner. A fourth method, disposal, is used only as a measure of last resort.

EO 13148, Greening the Government through Leadership in Environmental Management (May 2000) requires Federal agencies to integrate environmental accountability into daily planning and decision making in all their activities. This is achieved through developing and implementing EMS's at Federal facilities that provide for the systematic planning, integrated execution, and evaluation of programs for pollution prevention. This EO also requires each agency to comply with environmental regulations by establishing and implementing environmental compliance audit programs and policies that emphasize P2 as a means to both achieve and maintain environmental compliance. EO 13148 also requires reductions in toxic chemical releases and reductions in the use of selected priority chemicals or in the generation of hazardous and

radioactive wastes, as well as the phase out in procurement of Class I ozone-depleting substances (ODS).

EO 13149, Greening the Government through Federal Fleet and Transportation Efficiency (April 2000) requires the Federal Government to excercise leadership in the reduction of petroleum consumption through improvements in fleet fuel efficiency and the use of alternative fuel vehicles and alternative fuels. The Order is required to be met by all agencies operating 20 or more motor vehicles within the United States and includes reducing the entire fleets annual petroleum consumption by at least 20 percent by the end of 2005 compared to FY 1999 levels.

2.3 DOE Orders

DOE Order 450.1, Environmental Protection Program. On January 15, 2003, the Deputy Secretary issued DOE Order 450.1, which implements the requirement of EO 13148 that agencies integrate environmental accountability into planning and decision making by requiring all DOE sites to incorporate an EMS into their existing DOE-required Integrated Safety Management Systems. The EMS is to provide for the planning, execution, and evaluation of departmental programs to reduce or eliminate the generation of waste, the release of pollutants to the environment, and the use of Class I ODS through good business practices such as source reduction, reuse, and recycling and by procuring recycled-content materials and environmentally preferable products and services. The performance-based DOE Order 450.1 replaces the traditional command-and-control DOE Order 5400.1. DOE Order 450.1 also compliments the affirmative procurement requirements in RCRA Section 6002 and EO 13101 with P2 provisions for the specification and procurement of departmental supplies to maximize the procurement of recycled-content materials and other environmentally preferable products.

2.4 DEAR Clause 970.5223-2 Acquisition and Use of Environmentally Preferable Products and Services

DOE amended the DOE Acquisition Regulation (48 CFR 923, 936 and 970, Acquisition Regulation: Acquisition of Products Containing Recovered Materials) to require that management contractor subcontracts include the affirmative procurement requirements of EO 13101 and flow down those requirements in circumstances involving EPA-designated products. The acquisition regulation also was amended to require management contractors to comply with the fuel efficiency goals and requirements of EO 13149, "*Greening the Government Through Federal Fleet and Transportation Efficiency.*"

3.0 PORTS Roles and Responsibilities

BJC is the Management and Integration (M&I) Contractor at PORTS, and provides the direction and contract management oversight of the ES Program for all PORTS activities and subcontracts. BJC subcontracts the development and implementation of the ES Program to *WASTREN*, Inc. Although the ES Program Manager reports to the *WASTREN* Waste Management (WM) organization, his or her job responsibilities involve working with all PORTS subcontractors to integrate ES and P2 into all applicable work activities, as directed by BJC.

3.1 DOE PPPO Environmental Sustainability Coordinator

The PPPO Environmental Sustainability Coordinator is responsible for overseeing the ESP by ensuring PORT's commitment to environmental stewardship; evaluating ESP performance; approving plans, funding, policies, goals, and milestones; reviewing reports and assessments; and ensuring all PORTS employees are trained to and aware of ESP objectives. The DOE ES Coordinator is responsible for establishing the mission and vision of the PORTS ES Program.

3.2 Management and Integrations Contractor – Bechtel Jacobs LLC (BJC) ESP Coordinator

The BJC ESP Coordinator is responsible for ensuring PORTS compliance with all environmental regulations, identifying appropriate roles and responsibilities for ESP within BJC, and designating BJC managers as members of the Pollution Prevention Advisory Council. The ESP Coordinator is responsible for ensuring that P2 is embraced by all PORTS subcontractors and is fully integrated in all PORTS work activities. The ESP Coordinator provides direction to the WASTREN Program Manager, evaluates program implementation, and reviews all ESP strategies, plans, budgets, and reports.

3.3 WASTREN ESP Program Manager

The WASTREN ESP Program Manager is responsible for collecting, tracking, and reporting ESP information while coordinating and implementing the day-to-day operations of the ESP.

The WASTREN ESP Program Manager coordinates all ES activities of DOE managed operations at PORTS at the direction of the BJC ESP Coordinator. The responsibilities of the WASTREN ESP Program Manager are to:

- develop plans and guidance for site-wide ESP implementation;
- identify program resource requirements;

- recommend, in conjunction with the P2 Advisory Council, site-wide source reduction, recycling, and programmatic goals in accordance with DOE Order 450.1 and DOE Headquarters (HQ) guidance;
- provide ESP training and awareness;
- develop and operate ESP incentive programs;
- facilitate interaction between waste generators and Waste Management to obtain support for the ESP;
- evaluate environmental aspects and impacts and recommend priorities for aspect and impact analysis in conjunction with the P2 Advisory Council;
- support material and waste tracking system improvement efforts;
- promote the implementation of ESP opportunities through the application of best management practices;
- identify and evaluate innovative technologies that will reduce waste generation and releases to the environment;
- quantify P2 accomplishments;
- track progress toward achieving program goals; and
- prepare and submit required reports.

3.4 Pollution Prevention Advisory Council

The P2 Advisory Council provides a positive forum for the initiation, discussion, and implementation of ESP elements at PORTS. The P2 Advisory Council is the PORTS forum for communication and resolution of site wide issues regarding the management of property, materials, and wastes for DOE, BJC, and subcontractor relationships. The efforts of the P2 Advisory Council focus on setting goals and priorities for effective ES management.

Another function of the P2 Advisory Council is to formulate smaller, expert teams called Aspect and Impact Analysis (AIA) Teams – formerly known as Pollution Prevention Opportunity Assessment (PPOA) Teams - to evaluate specific, priority projects and activities to ensure they maximize efficiencies and that project planning includes developing, establishing, managing, and promoting good life cycle management decisions regarding pollution prevention, waste minimization, affirmative procurement, energy and water efficiency, and sustainable design.

Section 5.5.3 discusses the role of AIA Teams. The P2 Advisory Council meets monthly and is lead by an elected chairperson.

The P2 Advisory Council team members will be DOE and contractor representatives from both programmatic and operations areas of PORTS. Members are appointed for 1-year terms. The DOE Manager appoints one individual from the PORTS DOE office and the BJC Manager of Projects appoints the following:

- Deputy Manager of Projects – Ex Officio Member
- Public/Regulatory Affairs Manager – Voting Member
- Performance/Quality Assurance Manager – Ex Officio Member
- Field Services Manager – Voting Member
- Planning and Controls Manager – Voting Member
- Engineering and Nuclear Safety Manager – Voting Member
- Environment, Safety and Health Manager – Voting Member
- Inactive Facility Removal and Infrastructure Projects Manager – Voting Member
- Environmental Projects Manager – Voting Member - (alternate months with Inactive Facility Removal and Infrastructure Projects)
- Waste Disposition Projects Manager – Ex-Officio Member
- Procurement Manager – Voting Member
- WASTREN Manager – Voting Member
- Pro2Serve Manager – Voting Member
- TetraTech Manager – Voting Member - (alternate months with WSMS/NISYS)
- WSMS/NISYS Manager – Voting Member - (alternate months with TetraTech)
- CDM/EQM Manager – Voting Member
- SEC Manager – Voting Member
- Represented Work Force – Voting Member
- Represented Guard Force – Voting Member

3.5 Green Acquisition Advocates

DOE's Senior Procurement Executive issued Acquisition Letters in Fiscal Year 2000 establishing a policy of partnership between acquisition and program staff at each DOE site and requiring sites to designate a Green Acquisition Advocate. The PORTS Green Acquisition Advocate will serve as the procurement expert and P2 Advisory Council member for ensuring the requirements of RCRA and the "Greening the Government" Executive Orders are met.

3.6 PORTS Employees

All employees working in PORTS facilities are involved in the management of materials, property, and/or waste and are responsible for making sound, cost-effective decisions regarding how these materials are managed. Employees should manage property, materials, and/or wastes

according to training, procedural requirements, and contractual requirements in order to minimize the generation of additional wastes; maximize recycle and reuse of materials and/or wastes; and promote the wise procurement, use, and disposition of such materials.

4.0 ESP Goal Development

In 1999, the Secretary of Energy established P2 leadership goals for the year 2005 and energy efficiency (E2) leadership goals for 2010. These goals were developed to reduce the environmental impact of site operations. The goals included reducing waste, increasing recycling activities, and buying items with recycled content, improving energy usage, reducing the use of ozone depleting substances, reducing greenhouse gas emissions, increasing vehicle fleet efficiency, and using alternative vehicle fuels. In 2001, the Secretary reaffirmed the use of these DOE goals to meet the requirements of EO 13148, *Greening the Government through Leadership in Environmental Management.*

A summary of the DOE Departmental Goals, their applicability at PORTS, and the PORTS status follows in Section 4.1.

4.1 DOE Departmental Goal Summary

P2 or E2 Goal	Applicability	Comment/Status
Reduce waste from routine operations by 2005, using a 1993 baseline, for these waste types: Hazardous 90 percent Low Level Radioactive 80 percent Low Level-Mixed Radioactive 80 percent Transuranic (TRU) 80 percent	 No No No No	PORTS does not perform routine operations since its mission is to remediate the site and remove the legacy wastes for treatment and/or disposal. No TRU waste generated onsite
Reduce releases of toxic chemicals subject to Toxic Chemical Release Inventory reporting by 90 percent by 2005, using a 1993 baseline.	Yes	Has been met
Reduce sanitary waste from routine by 75 percent by 2005, and 80 percent by 2010, using a 1993 baseline.	No	PORTS does not perform routine operations

P2 or E2 Goal	Applicability	Comment/Status
Recycle 45 percent of sanitary wastes from all operations by 2005 and 50 percent by 2010.	Yes	Has not been met, working towards this goal
Reduce waste resulting from cleanup, stabilization, and decommissioning activities by 10 percent on an annual basis.	Yes	Not being tracked at this time
Increase purchases of EPA-designated items with recycle content to 100 percent, except when not available competitively at reasonable price or that do not meet performance standards	Yes	Being tracked, should meet the goal
Retrofit or replace 100 percent of chillers greater than 150 tons of cooling capacity and manufactured before 1984 that use class I refrigerants by 2005.	No	Decommissioning work takes precedence over retrofits, not cost effective
Eliminate use of class I ozone depleting substances by 2010, to the extent economically practicable, and to the extent that safe alternative chemicals are available for DOE class I applications.	Yes	Working towards this goal
Reduce greenhouse gas emissions attributed to facility energy use through life-cycle cost effective measures by 25 percent by 2005 and 30 percent by 2010, using 1990 as a baseline.	No	No baseline available, decommissioning to be completed prior to 2010
Reduce energy consumption through life-cycle cost effective measures by: a) 40 percent by 2005 and by 45 percent by 2010 per gross square foot for buildings, using a 1985 baseline. b) 20 percent by 2005 and 30 percent by 2010 per gross square foot, or per other unit as applicable, for laboratory and industrial facilities, using a 1990 baseline.	Yes	No baseline established or funding to develop a baseline
Increase the purchase of electricity from clean energy sources: a) Increase purchase of electricity from renewable energy sources by including provisions for such purchase as a component of requests for bids in 100 percent of all future DOE competitive solicitations for electricity. b) Increase the purchase of electricity from less greenhouse gas-intensive sources, including, but not	Yes	Purchasing through USEC using existing power grids and energy sources in accordance with contract terms and memorandum of understanding with USEC. Need to re-negotiate contract terms.

P2 or E2 Goal	Applicability	Comment/Status
limited to, new advanced technology fossil energy systems, hydroelectric, and other highly efficient generating technologies.		
Reduce the entire fleet's annual petroleum consumption by at least 20 percent by 2005 in comparison to 1999, including improving the fuel economy of new light duty vehicle acquisitions and by other means.	No	No government-owned vehicles at PORTS
Acquire each year at least 75 percent of light duty vehicles as alternative fuel vehicles, in accordance with the requirements of the Energy Policy Act of 1992.	No	Same as above
Increase usage rate of alternative fuel in departmental alternative fuel vehicles to 75 percent by 2005 and 90 percent by 2010 in areas where alternative fuel infrastructure is available.	No	Same as above

4.2 ESP Objectives

PORTS is committed to minimizing and/or eliminating the amounts and types of wastes generated and to achieving reduced life cycle costs for managing and dispositioning property and wastes by integrating pollution prevention, energy and water efficiency, and sustainable design concepts as a good business practice in the planning, execution, and evaluation of all PORTS projects and activities.

It is difficult to establish source reduction goals at the PORTS site as most wastes are associated with previously contaminated media and handling of legacy waste. P2 activities occur on a project-by-project basis, but the overall volume of waste generated is determined primarily from previous actions or primary wastes left over from past activities. Use of innovative technologies to reduce waste volume characterized as hazardous and radioactive are at times hindered by legally defined best management practices and absence of a de minimis standard for radiologically contaminated materials. PORTS will continue to integrate P2/WMin and sustainability techniques into the planning and operational phases of all cleanup and remediation projects to the greatest extent possible.

The following broad objectives are core elements of the PORTS ESP program. These objectives are both qualitative and quantitative.

Reduce the life cycle cost and liability of PORTS programs and operations by the following:

- Eliminating, minimizing, or recycling wastes that would otherwise require storage, treatment, disposal, and long-term monitoring and surveillance.
- Eliminating or minimizing use of toxic chemicals and associated environmental releases that would otherwise require control, treatment, monitoring, and reporting.
- Maximizing the use (procurement) of recycled-content materials and environmentally preferable products and services thereby minimizing the economic and environmental impacts of managing by-products and wastes generated in the conduct of mission-related activities.
- Reducing the life-cycle cost of managing personal property at PORTS.

The P2 Advisory Council will determine more specific quantitative or numeric "goals" each Fiscal Year based upon the objectives and targets identified in the PORTS EMS. Priority will be given to eliminating RCRA mixed and Toxic Substances Control Act (TSCA) radioactive waste due to higher associated health and safety hazards and limited treatment and disposal sites for these wastes. RCRA, low-level radioactive, and sanitary/industrial wastes will also be addressed. However, individual waste streams must be independently evaluated given generation rate, cost of disposal/treatment, P2 alternatives, liability concerns, and related impacts upon human health and the environment.

4.3 ESP Strategy

Effective environmental sustainability management begins with an integrated strategy. In order to achieve the ESP objectives and targets, PORTS must develop and deploy a well-defined strategy for setting, updating, and achieving PORTS objectives and targets in line with the site EMS and in conjunction with any new DOE P2 and E2 goals.

The period of performance for the current P2 goals will expire in 2005 and the E2 goals in 2010. DOE is considering developing corporate (qualitative) P2 goals for the years 2006 through 2010, such as increasing the DOE's participation in the USEPA P2 initiatives including Waste Wise, the National Environmental Performance Track, Green Engineering, National Waste Minimization Programs, and other voluntary programs. DOE sites would participate in programs appropriate to their environmental aspects and impacts and would establish specific (quantitative) goals as part of the site EMS. Such an approach to establishing P2 goals would

shift the DOE from numeric corporate goals (one size fits all) to a performance-based (qualitative) approach.

Any new DOE P2 or E2 goals established by DOE will be evaluated and analyzed for applicability and prioritization with the PORTS EMS objectives and targets. PORTS will also continue to maintain and improve existing programs such as training, awareness and incentives, assessments, tracking, and measuring as described in Section 5.0.

5.0 Overview of PORTS Environmental Sustainability Program

PORTS currently has numerous programs and plans that address various aspects and elements of environmental sustainability, but the ESP brings these elements together into one comprehensive, overriding program addressing the life cycle management of materials and wastes at PORTS and ties this program to the future site EMS.

5.1 Managing and Planning Resources/Budget

The Greening the Government Executive Orders direct Federal agencies to give high priority to obtaining funding and resources needed for implementation of those Orders. DOE Order 450.1 requires that line management sites ensure that their program annual budgetary processes include the funding and resources to implement and monitor these programs.

Budgeting for compliance with the requirements specified in this plan is the responsibility of each PORTS organization. Adequate funds must be allocated for supporting the ESP and all elements discussed in this plan.

5.2 ESP Training and Continuing Education

The goal of ESP Training and Continuing Education Program for PORTS is for all site personnel to receive appropriate training and education to ensure successful implementation of the ESP. While upper management makes programmatic decisions regarding the ESP, it is the personnel out in the plant who implement those policy decisions. These personnel are the key to implementing a successful ESP. In addition, training emphasizes how each individual's daily activities can contribute to reducing the total amount of hazardous materials used, waste generated, or materials and property recycled and reused, as well as how energy and water consumption can be reduced. Personnel incentives or participation programs are also essential to foster ownership of the ESP and to help recognize individual or group contributions in reducing or eliminating hazardous material usage or waste generation in their daily activities.

The BJC ESP Coordinator and P2 Advisory Council are responsible for ensuring PORTS employees attend the appropriate type and level of ESP training, pursuant to EMS training requirements. Current PORTS training programs containing ESP elements include the following:

- General Employee Training (GET) Orientation Program
- Site Access Training
- Specific, targeted P2 and EMS training programs
- Radiological Worker Training
- Hazardous Waste Worker Training

Training programs for PORTS personnel are an important element of the ESP. A solid training program educates all personnel regarding ESP issues and technologies and empowers employees to evaluate their individual work activities and identify methods to cost-effectively improve operations. An effective ESP training program will foster environmentally conscious decision-making and result in reduced hazardous material usage, reduced waste generation, increased recycling and reuse, and decreased costs associated with facility operations.

5.3 Promoting ESP Awareness

General awareness among PORTS personnel regarding proper waste and material management, recycling, and material conservation initiatives is important to the success of the ESP. Maintaining ESP awareness will foster environmentally conscious decision-making in everyday operations.

The BJC ESP Coordinator will take the lead in ensuring that all environmental awareness initiatives address ESP initiatives. The three elements of the ESP Awareness Program are:

- Publicity, Information Exchange, and Employee Suggestion Program
- Incentives Program
- Public Outreach

5.3.1 Publicity, Information Exchange, and Employee Suggestion Program

Awareness of the ESP efforts taking place at PORTS is enhanced by continually publicizing successes and encouraging employees to evaluate their activities for potential waste reduction opportunities. Employees have the power to limit the successfulness of a program or to advance it beyond expectations. By encouraging ideas and acknowledging successes, PORTS can strengthen the ESP. This will be done by the following methods:

- Develop ESP success stories for the site periodicals. The BJC ESP Coordinator, in conjunction with WASTREN ES Program Manager, will take the lead on writing articles or small notices for these publications. These articles will address pollution prevention and waste minimization technologies or techniques deployed, the waste reduction and/or cost savings achieved from implemented opportunities, and a picture or description of the person or organization involved in executing the successful action. Publicizing successes and tying the success to cost savings and waste reduction will help achieve upper management support for the ESP.
- Compile a listing of best management practices to disseminate to project managers.
- Transmitting weekly electronic pollution prevention messages to all PORTS employees via the Intranet.
- Develop flyers and brochures for new employees on ESP efforts (recycling and reuse programs, affirmative procurement) and include ways for employees to be involved including participation in recycling efforts and the employee suggestion program.
- Distribute the Annual Pollution Prevention Performance Report and other Annual EO reports to appropriate PORTS managers. This will keep key personnel aware of progress and changes in the ESP program.
- Participate in annual P2 Awards Programs such as the White House Closing the Circle Awards. This award recognizes Federal employees and Federal facilities for their efforts that resulted in significant contribution to or have made a significant impact on the environment. Nomination packages are generally due to DOE Headquarters (HQ) by the end of the Calendar Year (CY) and to the Office of the Federal Environmental Executive (OFEE) by early in the CY. Visit http://www.ofee.gov for more information and details.
- Utilize the PORTS Intranet to post guidance, P2 Advisory Council meeting minutes, white papers, Fact Sheets, award nominations, etc.
- Publicize the availability and use of the following resources for ideas, lessons learned, and technologies:

    1. Pollution Prevention Information Clearinghouse (PPIC)
       http://epic.er.doe.gov/epic
    2. Environmental Protection Agency
       http://www.eps.gov/ebtpages/pollutionprevention.html
    3. DOE Lessons Learned

       http://tis.eh.doe.gov/ll/
    4. Pollution Prevention Equipment
- http://www.lakehurst.navy.mil/p2/

5.3.2 Incentives Program

To encourage employee involvement in the ESP, the BJC ESP Coordinator will provide recognition of employee's efforts. Suggestions that are selected and implemented will be highlighted in the site newsletters. Pictures of the employee will be included in the articles.

5.3.3 Public Outreach

The DOE PPPO Environmental Policy Statement stipulates that PORTS will demonstrate its corporate and environmental citizenship by continuously striving toward sustainability and good environmental stewardship. PORTS will continue to partner with the local community in publicizing environmental issues and concerns.

PORTS has been involved in public outreach and partnering over the years. Examples of continuing outreach programs include the following:

- Environmental Fairs
- Local school Speaker's Bureau
- Junior Achievement
- Earth Day activities in Ohio
- Sponsored a trip for local school children to the Center of Science and Industry
- Southern Ohio Development Initiative (SODI) – a local community reuse organization for communities surrounding PORTS
- Gifting programs to local schools of excess computers

5.4 Tracking and Reporting

5.4.1 Tracking

Tracking of environmental data at PORTS will be an essential part of an EMS program. PORTS currently has a comprehensive and computerized waste tracking system that can identify waste types, waste quantities, date generated, waste generation, and other character data fields. This system, the Portsmouth Waste Tracking and Reporting System (PWTARS), does not track sanitary and industrial waste, but it does track all TSCA, RCRA, and radioactive waste. Data to be input into the system is derived from the Request for Disposal (RFD) form. The RFD form is required for waste generated at PORTS, and completed forms are kept in a secure storage location for documentation.

The waste tracking systems are used to facilitate reporting waste minimization data and accomplishments to DOE and other federal, state, and local authorities. Hazardous materials purchased for operational purposes are tracked and accounted for through the PORTS ES&H Division.

5.4.2 Reporting

PORTS generates many types of environmental reports including data reports, status and progress reports, and regulatory compliance reports. These reports are required by a myriad of government programs and agencies and are maintained according to the requirements set forth in the PORTS EMS. These records and reports will also be used in developing PORTS Action Plans in order to achieve the objectives and targets identified in the PORTS EMS. Reports include the following:

- EPCRA Section 302 and 313 chemicals
- Clean Air Act Class I and Class II Ozone Depleting Substances
- Waste generation data and waste minimization/recycling activities for the DOE Annual Waste Generation Progress Report of Waste Reduction Performance
- Ohio EPA RCRA Annual Report
- P2 Report to Ohio EPA required as a condition of the site's RCRA Part B permit
- Purchases of environmentally preferable products
- Inventories of DOE personal property
- Disposition data (volumes and costs) on waste and excess materials and equipment

5.5 ESP Program Implementation

5.5.1 Environmentally Preferable Purchasing and Material/Inventory Control

RCRA Section 6002 requires Federal agencies to establish affirmative procurement programs for purchasing products designated by EPA that contain recycled material. EO 13101 also charges Federal agencies to purchase recycled content and other environmentally preferable products, and requires annual reporting of Federal agency performance regarding 'green' procurement. DOE Order 450.1 complements these requirements with provisions for P2 in the specification and acquisition of departmental supplies to maximize the procurement of recycled-content materials and other environmentally preferable products.

In May 2001, DOE issued a Draft *Affirmative Procurement Program for Recycled Content and Biobased Products -- Guidance for Compliance with Section 6002 of the Resource Conservation and Recovery Act and Executive Order 13101* to address DOE's Affirmative Procurement Program and recommend ways to implement successful programs at DOE sites. DOE's Affirmative Procurement Program applies to program and procurement offices and contractors operating DOE facilities for all procurements, including micro-purchases (at or below $2,500), in which an EPA-designated item is procured. EPA is required to designate products that are or can be made with recovered materials and to recommend practices for buying these products. There are currently 56 items made with recycled content designated by EPA. DOE's program includes

establishing practices and procedures for purchasing recycled-content products; actively promoting these purchases; estimating, verifying, and certifying the recycled content of the purchased products; and reviewing and reporting progress on an annual basis.

PORTS has designated a Green Acquisition Advocate as required by the DOE's Senior Procurement Executive. The PORTS Green Acquisition Advocate will serve as the procurement expert and P2 Advisory Council member for ensuring the requirements of the "Greening the Government" Executive Orders and RCRA are met. Designated items are procured unless they are not readily available, not cost competitive, or do not meet specifications.

5.5.2 Waste Minimization Program and Hazardous Material Management

The ESP provides the infrastructure to ensure that PORTS controls operations in a manner that reduces hazards associated with the work to be performed and use pollution prevention and waste minimization to improve operations as set forth in the PPPO Environmental Policy Statement.

The PORTS waste minimization program includes activities that eliminate or minimize the generation of waste by encouraging product substitution, alternate use, reuse, reclamation, recycling, or segregation of waste and materials. Hazardous and radioactive materials and wastes must be managed in a safe, compliant, and cost-effective manner.

5.5.2.1 Hazardous Material Approval and Tracking

The PORTS hazardous and material approval and tracking system implements best management practices to ensure compliance with federal and state of Ohio regulatory requirements for hazardous material use and storage. The system also formalizes a methodology to control and account for hazardous materials through identification, request, approval, and inventory for the purchase, use, and/or storage of hazardous materials.

Each material requester is required to consider the use of materials that are non-hazardous, less toxic, or produce minimal waste. Organizations are to review ongoing and especially new activities and determine if regulated materials are or will be used and consider a substitution.

Organizations must obtain pre-approval for purchasing any potentially regulated material. If an organization is known or suspected of using regulated materials, they must perform semi-annual inventory audits of the materials storage and use and identify potential substitutions.

5.5.2.2 Recycle and Reuse Programs

Recycling and reuse is a key component of a comprehensive waste minimization program. It is the responsibility of each organization to encourage the use of existing recycling and reuse programs and to expand, wherever possible, to include materials not currently being reused or recycled.

Recycling programs exist for the collection and recycle of aluminum cans, mixed waste office paper, fluorescent light bulbs, incandescent light bulbs, corrugated cardboard, lead-acid batteries, nickel-cadmium batteries, some wooden pallets, and scrap metals. PORTS participates in the local school gifting programs, whereby used computers and other electronics are given to schools for reuse. If old computers and electronics are not wanted by local schools or by the SODI, they will be sent to the National Electronic Recycle Center in Oak Ridge, TN for recycle and/or reuse.

Segregation during project operation is the key to the success of the recycling and source reduction program at PORTS. The separation of radioactively contaminated material from non radioactive material will save money and benefit recycling. Also, the separation of RCRA or TSCA materials from those that are not RCRA and/or TSCA contaminated is cost-efficient, thus aiding recycling efforts.

Through planning, PORTS will determine whether or not a waste stream will be eligible for recycling based on the following criteria: cost/benefit of recycling versus disposal, feasibility of the material for radiological release, availability of vendors to recycle the material, recycling technology, liability, and resource allocation.

Another element of the recycle and reuse program at PORTS is to try and keep potential waste (sanitary, hazardous, universal) identified as property for as long as possible. This allows the reuse pathway to remain open for a longer period of time before declaring the item a waste and determining a disposal option. PORTS will utilize the BJC Procurement Organization (Property Group), the Environmental, Safety, and Health Organization, and the Waste Disposition Organization to develop and operate an Excess Asset Management System (EAMS) for the reuse of materials and chemicals that are considered excess and non-inventoried. These organizations will be cross-trained on environmental and procurement issues in order to align the shared vision of property as an asset, not a waste. The EAMS will develop a method to routinely identify, capture, and list excess materials and chemicals in an inventory format. Every attempt will be made to publicize the items for reuse first at PORTS and then to other DOE sites and the SODI.

5.5.3 Aspect and Impact Analysis - P2 Opportunity Assessments

DOE Order 450.1 requires sites to conduct P2 Opportunity Assessments of site operations to identify opportunities for waste reduction and recycle/reuse, pollutant release reduction, procurement of environmentally preferable products, energy use reduction, use of sustainable design principles, etc. Based on the findings of these assessments, sites should implement cost-effective projects and practices. P2 Opportunity Assessments have been performed for many years by DOE sites including PORTS. P2 Opportunity Assessments are similar in scope and applicability to the EMS AIA and will be included in this process.

The PORTS EMS process will identify significant environmental aspects and impacts that will be a source of potential AIAs. The AIA will be the formalized analysis of opportunities to reduce the life cycle cost and environmental impacts of site operations. The analysis involves identifying the flow of materials into, through, and out of a particular process. It allows the investigating team to implement more effective methods, establish controls, or effect specific changes, such as initiating material substitution and recycling.

The P2 Advisory Council will identify and prioritize potential AIAs relevant to ESP initiatives and EMS objectives and targets. The P2 Advisory Council may identify AIAs based upon the following: the need to better understand a process; the potential to identify, purchase, and use environmentally appropriate products and materials; the need to investigate, and where appropriate, develop alternatives to existing material use and waste management practices. The P2 Advisory Council will identify AIA team members based upon individual expertise and the level of effort required. The AIA team then conducts the AIA and provides the analysis documentation to the P2 Advisory Council. The P2 Advisory Council evaluates the AIA and decides if the opportunity should be implemented. Completed AIAs may become part of the EMS Action Plans for achieving particular objectives and targets set forth in the EMS.

5.5.4 Ozone Depleting Substances

Since the early 1990s, DOE has instituted a number of efforts to reduce its inventory and use of Class I ODS in a cost-effective manner. The principal drivers for the Department's move toward discontinuing its use of ODS are the requirements in EO 13148, the EPA's Clean Air Act's stratospheric ozone protection regulations, and two ODS phase-out goals that are part of DOE's P2/E2 Leadership Goals.

The ODS-related goals require the retrofit or replacement of large, aging chillers that use Class I refrigerants by 2005. Since PORTS is involved in major decommissioning activities it is not cost effective to retrofit these old chillers. These chillers will be part of eventual decommissioning activities at the plant. The other ODS goal is the elimination of Class I ODS use by 2010, to the extent economically practicable. PORTS will accomplish this goal in the course of the decommissioning and remediation activities.

5.5.5 Energy and Water Conservation

The DOE is committed to reduce energy and water use and associated costs to the lowest cost-effective levels. The DOE can lead the nation in energy and water efficient building design, construction, and operation by promoting energy efficiency, water conservation, use of renewable energy products, and by fostering markets for emerging technologies. The following Executive Orders and DOE Orders provide the requirements for efficient energy and water management:

- Executive Order 13123, *"Greening the Government Through Efficient Energy Management*"" (supercedes Executive Order 12902), signed June 3, 1999
- Executive Order 13221, "*Energy-Efficient Standby Power Devices*," signed July 31, 2001
- DOE Order 430.2A, "*Departmental Energy and Utilities Management*"

PORTS currently has no energy or water consumption baselines. There is no budget available to develop baselines for tracking purposes or from which to measure energy or water reductions. PORTS is undergoing decommissioning and remediation activities and buildings are being evaluated for potential reuse or deconstruction. If a building is targeted to be reused in USEC's centrifuge enrichment project, USEC will be responsible for facility upgrades and retrofits for energy and water conservation. PORTS has retrofitted some lighting with energy efficient fixtures and has installed several timers and motion sensors in common areas. Awareness campaigns have targeted employee involvement in reducing energy consumption by turning off lights, computers, and other energy sources. PORTS will continue to publicize methods to reduce energy and water consumption in conjunction with the weekly electronic e-mail messages.

5.5.6 Sustainable Design

Sustainable design at PORTS for process/project and/or new facilities is centered around waste storage issues and remedial actions from cleanup projects. Very few new buildings or new processes are being considered at the PORTS site. If new buildings or processes are discussed, sustainable design would be addressed through use of P2 techniques developed during the planning phase of a project and documented through either the National Environmental Policy Act process, preparing a generator's waste management plan, or an AIA. Optimizing the design and material selection for a new process or facility provides the DOE with a showcase for efficient use of material resources, reduced energy consumption, and the cost-effective use of renewable energy sources.

5.6 Updating the Plan

The ES plan is a living document and will be updated as needed or in totality every three years to reflect new program goals, objectives, or strategies, new technologies, innovative investment strategies, or approved and updated environmental requirements.

6.0 References

1. Bechtel Jacobs Company, *2003 Site Pollution Prevention Plan for the Portsmouth Gaseous Diffusion Plant,* July 2003.
2. U.S DOE, *The Cost of Waste Disposal: Life Cycle Cost Analysis of Disposal of DOE Low Level Radioactive Waste at Federal and Commercial Facilities,* February 2002.

DOCUMENT FOR REVIEW

nt: Base Contract, Technical Specification 10060, Environmental Sustainability Plan
Letter Dated July 02, 2004 MJN/PORTS-116/0704

Return Date: 07/27/04

Sent Out for Review: 07/20/04

Return to: **Jackie France-Waste Disposition-Beckie Thomas**

Reviewer	Signature	Date of Review	Comments

(DO NOT THROW THIS REVIEW SHEET AWAY. This is a tracking device. If you have no comments, PLEASE SIGN/INITAL, DATE and in the review column put "No Comment." Please return on or before the indicated "RETURN DATE.")

OhioEPA
State of Ohio Environmental Protection Agency

Southeast District Office

195 Front Street
ogan, OH 43138

TELE: (740) 385-8501 FAX: (740) 385-6490

Bob Taft, Governor
Jennette Bradley, Lieutenant Governor
Christopher Jones, Director

February 23, 2004

RE: PIKE COUNTY
PORTSMOUTH GASEOUS DIFFUSION PLANT
RCRA-LQG/TSDF
OH7890008983/ 04-57-0680

Mr. Russell J. Vranicar
Deputy Site Manager
P.O. Box 700
Piketon, Ohio 45661-0700

Mr. Gilbert Drexel
Bechtel Jacobs Company LLC
P.O. Box 700
Piketon, Ohio 45661-0700

Dear Sirs:

On February 10 and 11, 2004, Jim Michnowicz and I inspected the Portsmouth Gaseous Diffusion Plant (PGDP) in Portsmouth, Ohio to determine PGDP's compliance with Ohio's hazardous waste laws, the facility's hazardous waste installation and operation permit which became effective on March 15, 2001, and the October 4, 1995, Directors Final Findings and Orders (Site Treatment Plan). Our inspection included an inspection of company operations and a review of written documentation.

During the inspection we found the following violations of the hazardous waste installation and operation permit and of Ohio's hazardous waste laws.

1. **General Permit Condition, B.6. Personnel Training OAC Rule 3745-54-16(C)**:

The Permittee shall conduct personnel training, as required by OAC rule 3745-54-16. Facility personnel shall take part in an annual review of the initial training as required by this rule.

While reviewing the personnel training records it was discovered that several employees had not received the annual training within a years time as required by this rule. USDOE/Bechtel Jacobs must develop a better procedure to ensure that employees are receiving the annual training within 365 days of the last training. USDOE/Bechtel Jacobs must provide a copy of this procedure to Ohio EPA to demonstrate compliance with this rule.

2. **General Permit Condition, A.5. Duty to Comply OAC Rule 3745-50-58(A)**:

   The Permittee shall comply with all applicable provisions of Ohio Revised Code (ORC) Chapter 3734, all applicable Ohio hazardous waste rules, and all terms and conditions of this permit, except to the extent and for the duration such noncompliance is authorized by the laws of the State of Ohio. Any permit noncompliance, other than noncompliance authorized by the laws of the State of Ohio, constitutes a violation of ORC Chapter 3734 and the rules adopted thereunder and is grounds for enforcement action, suspension, revocation, modification, revision, denial of a permit renewal application or other appropriate action.

   See violation #1.

3. **Labeling/marking - standards OAC rule 3745-273-34(A)**: Universal waste batteries (i.e., each battery), or a container or tank in which the batteries are contained, shall be labeled or marked clearly with any one of the following phrases: "Universal Waste-Battery(ies)", "Waste Battery(ies)", or "Used Battery(ies)."

   During the inspection, it was discovered that the universal waste batteries were in a pile and were not individually labeled or contained in a container. On February 12, 2004, Bechtel Jacobs submitted photographs demonstrating that the batteries had been placed in a labeled container. Based on this documentation, USDOE/Bechtel Jacobs had returned to compliance with this rule.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. You can find more information about pollution prevention, including fact sheets at the following web address: http://www.epa.state.oh.us/opp. If you would like to be considered for an in-depth on-site pollution prevention assessment or if you would like more information about pollution prevention assessments, please contact me at 740-380-5256. You can also find copies of the rules and other information on Ohio EPA's web page at http://www.epa.state.oh.us.

Enclosed you will find a copy of the checklists completed during the inspection. Should you have any questions, please feel free to contact me 740-380-5256.

Sincerely,

Melody Stewart
District Representative
Division of Hazardous Waste Management

MS:sb

Enclosure

cc: Tammy McConnell, DHWM-CO
Walt Francis, USEPA - Region V

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

As of: 06/18/04

Active Satellite Accumulation Areas

Registration #	Facility	Location	Responsible Generator	Company	Phone #
PS-08	X-622	Northeast corner of process area	Mark Pelfrey	Wastren	2393
PS-09	X-622T	Inside west wall	Mark Pelfrey	Wastren	2393
PS-11	X-624	East side of process area	Mark Pelfrey	Wastren	2393
PS-22	X-326	DMSA 1, Column F2	Jeff Riley	Wastren	5622
PS-29	X-330	DMSA 7, Column L71	Jeff Riley	Wastren	5622
PS-30	X-333	DMSA 13, Column Ux48	Jeff Riley	Wastren	5622
PS-31	X-3012	South side Maintenance Area, West Paint Room	Chris Ondera	Wastren	2344
PS-33	X-747H	East end of X-752 SCRAP YD.	Steve Allen or Bill Bellaw	BJC	2347
PS-39	X-3346	Supply Room, southeast portion of X-3346	Jim Tomlin	Wastren	3412

Active 90 Day Accumulation Areas

Registration #	Facility	Location	Responsible Generator	Company	Phone #
PN-25	X-623	Northeast Corner of Process Area	Mark Pelfrey	Wastren	2393

X-700 use [illegible] - ?

X-7446 - Go [illegible]

RCRA HAZARDOUS WASTE GENERATOR INSPECTION CHECKLIST

Company: Portsmouth Gaseous Diffusion Plant EPA ID#: OH7 890 008 983

Street: 3930 U.S. Route 23 South City: Piketon

County: Pike State: Ohio Zip: 45661

Mailing Address: _____
(If different from above)

Telephone: 740-897-5010 Fax #: _____

Owner/ Operator: _____
(If different from above)

Street: _____

City: _____ State: Ohio Zip: _____

Inspection Date(s): February 10 & 11, 2004 Time(s): 9:30 - 3:00 & 9:00 - 4:00

Inspection Announced? _____ Yes __X__ NO If so, how much advance notice given? _____

	Name	Affiliation	Telephone
Inspectors:	Jim Michnowicz	Ohio EPA	740-385-8501
	Melody Stewart	Ohio EPA	740-380-5256
Facility Representative:	Dee Perkins	USDOE	740-897-5010
	John Saluke	USDOE	740-897-5010
	Sandy Childers	BJC	740-897-5010
	Mary Williams	BJC	740-897-5010

Complete All Other Applicable Checklists

Generator Classification	Waste Management Activity
_____ Conditionally Exempt SQG (CESQG)	__X__ Containers
_____ Small Quantity Generator (SQG)	_____ Tank(s)
__X__ Large Quantity Generator (LQG)	__X__ Land Disposal Requirements (LDR)
_____ No Generation	_____ Used Oil
	__X__ Universal Waste
	_____ Other

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

PROCESS DESCRIPTION

Historically, the main function of the DOE-PORTS facility was to enrich uranium for military use (nuclear submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in UF6 feedstock which contains 0.711% U235. However, in 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). USDOE retained ownership of the ongoing site environmental restoration program as well as two permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and are leased by USEC. These include decontamination of equipment and uranium recovery (X-705 Bldg.); chemical cleaning of equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); photo and printing lab (X-100); vehicle repair (X-750); coal pile runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in DOE owned and permitted storage facilities. Waste generated by DOE from the environmental restoration is also stored in these facilities. USEC ceased the enrichment process in May 2001.

WASTE MANAGEMENT, GENERATION AND AMOUNT

Uranium contaminated hazardous wastes (mixed waste) which were/are generated by USEC and DOE are stored on-site in DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of TSDs in the U.S. which could accept mixed waste, and a May 1991 DOE moratorium on off-site waste shipment. A large percentage of the waste generated at PORTS is DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in DOE-owned storage areas. During the past year, numerous shipments of hazardous waste were manifested off-site by both DOE and USEC. This is due to an increase in treatment capacity at off-site commercial treatment facilities and DOE treatment facilities, the lifting of the moratorium, and the execution of the site treatment plans for DOE and USEC. DOE sends some waste off-site (to USDOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to DOE for storage in the interim prior to their final disposal.

Hazardous

The DOE Part B permit lists numerous hazardous waste codes for wastes that are generated by the above processes and the environmental restoration. These are stored in drums ranging in size from 30 to 110 gallon capacity, 5 gallon containers, 20 gallon lab packs, 5' cans, 4'x4'x6' boxes, 4'x4'x8' boxes, polybottles and laboratory bottles.

Nonhazardous

A wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes.

HAZARDOUS WASTE MANAGEMENT UNITS

The following DOE-owned permitted storage facilities were inspected during the CEI:

-X-7725	Container Storage Facility
-X-326	Container Storage Facility

In addition, DOE-owned and operated HWMUs and SAAs were inspected in the following buildings:

-X-326	-X-622
-X-7725	-X-624
-X-623	-X-625
-X-3012	-X-749
-X-333	-X-330
-X-622T	-X-747H

REGULATORY/ENFORCEMENT HISTORY

As a result of violations of state and federal hazardous waste regulations found during the 1987, 1988, and 1989 OEPA RCRA inspections, USDOE and OEPA entered into a Consent Decree governing restoration of the environment at DOE-PORTS. This decree includes a requirement that DOE close the X-701B, X-749, X-231B, and X-616 units within specific timeframes. The X-749, X-616 and X-231B units have now been closed. X-701B is yet to be closed.

On October 4, 1995, DFFOs were signed which allowed DOE to store LDR wastes in excess of one year, so long as waste is being stored in compliance with the orders and an approved site treatment plan. These orders supercede the May 18, 1993, DFFOs.

On February 24, 1998, DOE, LMES and Ohio signed DFFOs and a Consent Order regarding past violations and the management of DUF6 and LiOH.

On March 18, 1999, DOE and Ohio EPA signed DFFOs. These DFFOs provide exemptions to DOE and integrate the following unclosed units into the CMS/CMI process: X-749, X-231B, X-701C, X701B, X-230J7, and X-744Y.

A Part B permit was issued to DOE and its current co-operator, Bechtel Jacobs, for the X-7725 and X-326 storage facilities on March 15, 2001.

POLLUTION PREVENTION

1. Has the company undertaken any P2 activities to reduce the amount of hazardous waste generated? Yes _X_ No___N/A ___RMI

   a. ***If so,*** what has the company done to minimize hazardous waste generation?

   - ❑ A change in the process resulting in less waste.
   - ❑ A change in the product resulting in less waste.
   - ❑ Use of fewer and less toxic hazardous raw materials.
   - ❑ Better operations/improved housekeeping.
   - ❑ On-site recycling/reuse of hazardous materials.
   - ■ Sending waste off-site for recycling/reuse.
   - ❑ Other activities (specify): _____

   b. ***If so,*** what hazardous wastes have been addressed?

   - ❑ Solvents
   - ❑ Paint related wastes
   - ❑ Industrial process wastes (sludges, slags, contaminated waste waters, etc)
   - ❑ Contaminated oils/hydraulic fluids
   - ❑ Off-spec chemicals
   - ■ Fluorescent light bulbs
   - ■ Used batteries
   - ❑ Shop rags
   - ❑ Other (specify): _____

   c. ***If not,*** why hasn't the company considered P2?

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

2. Does the company plan to do P2 activities in the future? Yes_X_ No ___ N/A ___RMK#___

3. Would the company be interested in receiving additional information from Ohio EPA about P2? Yes_X_ No___ N/A ___RMK#___

4. Did you give the company information about P2 during the inspection? Yes_X_ No___ N/A ___RMK#___

5. Would the company like a P2 assessment? Yes___ No_X_ N/A ___RMK#___

If the company would like a P2 assessment done at their facility, the inspector must give the company representative a copy of the Pollution Prevention Assessments for Hazardous Waste Generators document and discuss it with them.

6. If the company does not want a P2 assessment, why not? Company has a program in place.

REMARKS

LARGE QUANTITY GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] — Yes X No ❑ N/A ___RMK#___

2. Has the generator obtained an identification number? [3745-52-12] — Yes X No ❑ N/A ___RMK#___

3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41] — Yes X No ❑ N/A ___RMK#___

WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? If so: — Yes ___ No X N/A ___RMK#____

   a. Has the generator notified U.S. EPA of export/import activity? [3745-52-53] — Yes ___ No ❑ N/A X RMK#___

   b. Has the generator complied with special manifest requirements? [3745-52-54] — Yes ___ No ❑ N/A X RMK#___

   c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] — Yes ___ No ❑ N/A X RMK#__

   d. Has an annual report been submitted to U.S. EPA? [3745-52-56] — Yes ___ No ❑ N/A X RMK#___

   e. Are export related documents being maintained on-site? [3745-52-57] — Yes ___ No ❑ N/A X RMK#___

GENERATOR CLOSURE REQUIREMENTS

5. Has the generator closed any <90-day accumulation unit(s) since the date of the last inspection? If so: — Yes ___ No X N/A ___RMK#___

   a. Describe the unit(s) which the generator has closed.
   PN-47 X-701 A/C

   b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] — Yes ___ No ❑ N/A X RMK#___

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

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

REMARKS

MANIFEST REQUIREMENTS

Are you aware of what the statement that you sign on the manifest says? Yes X No___

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

2. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] — Yes X No ❑ N/A ___RMK#___

NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]

3. Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)] — Yes X No ❑ N/A ___RMK#___

NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].

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

   a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] — Yes ___ No ❑ N/A X RMK#___

5. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)] — Yes X No ❑ N/A ___RMK#___

6. Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not: — Yes ___ No X N/A ___RMK#___

   a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)] — Yes X No ❑ N/A ___RMK#___

   b. If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)] — Yes ___ No ❑ N/A X RMK#___

7. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40] — Yes X No ❑ N/A ___RMK#___

REMARKS

PERSONNEL TRAINING

1. Does the generator keep records required by 3745-65-16(D) including:

   a. Job titles, as they relate to hazardous waste management, and the name of each employee filling *each job*? Yes _X_ No ❑ N/A ___RMK#___

   b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position? Yes _X_ No ❑ N/A ___RMK#___

   c. Type and amount of both introductory and continuing training to be given to each person filling a position? Yes _X_ No ❑ N/A ___RMK#___

   d. Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)? Yes _X_ No ❑ N/A ___RMK#___

NOTE: ***If the facility's business practices precludes written job titles/descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be used to document that all necessary employees have been trained.***

2. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to their positions? [3745-65-16(A)(2) Yes _X_ No ❑ N/A ___RMK#___

3. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]

   a. Emergency procedures? Yes _X_ No ❑ N/A ___RMK#___

   b. Emergency equipment? Yes _X_ No ❑ N/A ___RMK#___

   c. Emergency systems? Yes _X_ No ❑ N/A ___RMK#___

4. Does emergency training described in 3(a), (b) and (c) above include, *where applicable*: [3745-65-16(A)(3)(a-f)

   a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? Yes _X_ No ❑ N/A ___RMK#___

	b. Key parameters for automatic waste feed cut-off systems?	Yes _X_ No ❑ N/A ___RMK#___
	c. Communication or alarm system?	Yes _X_ No ❑ N/A ___RMK#___
	d. Response procedures for fire/explosions?	Yes _X_ No ❑ N/A ___RMK#___
	e. Response to groundwater contamination incidents?	Yes _X_ No ❑ N/A ___RMK#___
	f. Shutdown procedures?	Yes _X_ No ❑ N/A ___RMK#___
5.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes _X_ No ❑ N/A ___RMK#___
6.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes _X_ No ❑ N/A ___RMK#___
7.	Does the generator provide annual refresher training to employees? [3745-65-16(C)]	Yes ___ No ■ N/A ___RMK# 1___
8.	Are training records for current personnel kept until closure of the facility? [3745-65-16(E)]	Yes _X_ No ❑ N/A ___RMK#___
9.	Are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	Yes _X_ No ❑ N/A ___RMK#___

REMARKS

#1. Several employees did not receive the annual refresher training within a year from the last training.

CONTINGENCY PLAN

1. Does the generator have a contingency plan which describes the following: [3745-65-52(A) through (F)]

   a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? Yes _X_ No ❑ N/A ___RMK#___

   b. Arrangements/agreements with emergency authorities? [3745-65-37] Yes _X_ No ❑ N/A ___RMK#___

   c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? Yes _X_ No ❑ N/A ___RMK#___

   d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? Yes _X_ No ❑ N/A ___RMK#___

   e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary? Yes _X_ No ❑ N/A ___RMK#___

NOTE: ***If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]***

2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes _X_ No ❑ N/A ___RMK#_

3. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)(B)] Yes _X_ No ❑ N/A ___RMK#___

4. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] Yes _X_ No ❑ N/A ___RMK#___

EMERGENCY COORDINATOR

5. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes _X_ No ❑ N/A ___RMK#___

NOTE: ***The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan***

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes ___ No X N/A ___RMK#___

   a. Was the contingency plan implemented? [3745-65-51(B)] Yes ___ No ❑ N/A _X_RMK#___

   b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes ___ No ❑ N/A _X_RMK#___

   c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes ___ No ❑ N/A _X_RMK#___

NOTE: ***OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.***

REMARKS

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

1. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] — Yes _X_ No ❑ N/A ___ RMK#___

2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]

   a. Internal alarm system? — Yes _X_ No ❑ N/A ___ RMK#___

   b. Emergency communication device? — Yes _X_ No ❑ N/A ___ RMK#___

   c. Portable fire control, spill control and decon equipment? — Yes _X_ No ❑ N/A ___ RMK#___

   d. Water of adequate volume/pressure? — Yes _X_ No ❑ N/A ___ RMK#___

3. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] — Yes _X_ No ❑ N/A ___ RMK#___

4. Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33] — Yes _X_ No ❑ N/A ___ RMK#___

5. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32)*? [3745-65-34] — Yes _X_ No ❑ N/A ___ RMK#_

6. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] — Yes _X_ No ❑ N/A ___ RMK#___

7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] — Yes _X_ No ❑ N/A ___ RMK#___

   a. Where authorities have declined to enter into arrangements/agreements, has the generator documented such a refusal? [3745-65-37(B)] — Yes ___ No ❑ N/A _X_ RMK#___

REMARKS

GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)] — Yes No X N/A ___RMK#__

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

2. Does the generator ensure that satellite accumulation area(s):

   a. Are at or near a point of generation? — Yes X No ❑ N/A ___RMK#___

   b. Are under the control of the operator of the process generating the waste? — Yes X No ❑ N/A ___RMK#___

   c. Do not exceed a total of 55 gallons of hazardous waste? — Yes X No___ N/A ___RMK#___

   d Do not exceed one quart of acutely hazardous waste at any one time? — Yes X No ❑ N/A ___RMK#___

   e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? — Yes X No ❑ N/A ___RMK#___

NOTE: ***The 55 gallon limit applies to the area itself, and not to each individual waste stream accumulated in the area. The inspector should refer to Ohio EPA's November 1994 Guidance on the Location of Satellite Accumulation Areas.***

3. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so: — Yes ___ No X N/A ___RMK#___

   a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? — Yes ___ No ❑ N/A X RMK#___

   b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? — Yes ___ No ❑ N/A X RMK#___

USE AND MANAGEMENT OF CONTAINERS

4. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] — Yes X No ❑ N/A ___RMK#___

5. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes _X_ No ❑ N/A ___RMK#___

6. Are hazardous wastes stored in containers which are:

   a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes _X_ No ❑ N/A ___RMK#___

   b. In good condition? [3745-66-71] Yes _X_ No ❑ N/A ___RMK#___

   c. Compatible with wastes stored in them? [3745-66-72] Yes _X_ No ❑ N/A ___RMK#___

   d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes _X_ No ❑ N/A ___RMK#___

7. Is the container accumulation area(s) inspected weekly? [3745-66-74] (*Note location in general information section of checklist)* Yes _X_ No ❑ N/A ___RMK#___

   a. Are inspections recorded in a log or summary? [3745-66-74] Yes _X_ No ❑ N/A ___RMK#___

8. For ignitable and/or reactive hazardous waste(s):

   a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes _X_ No ❑ N/A ___RMK#___

   b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] Yes _X_ No ❑ N/A ___RMK#___

PRE-TRANSPORT REQUIREMENTS

9. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] Yes _X_ No ❑ N/A ___RMK#___

10. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes _X_ No ❑ N/A ___RMK#___

11. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes _X_ No ❑ N/A ___RMK#___

REMARKS

LARGE QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

GENERAL REQUIREMENTS

Has the LQUWH obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)] — Yes ___ No ❑ N/A X RMK#___

PROHIBITIONS

2. Did the LQUWH dispose of universal waste? [3845-273-31(A)] — Yes ■ No ___ N/A ___ RMK#___

3. Did the LQUWH dilute or treat universal waste, except when responding to releases or by managing specific wastes as provided in OAC 3745-273-33? [3745-273-31(B)] — Yes ❑ No ___ N/A X RMK#___

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES:

4. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)] — Yes ___ No ❑ N/A X RMK#___

5. If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? — Yes ___ No ❑ N/A X RMK#___

6. Does the LQUWH conduct any of the following activities:

   a. Sort batteries by type? — Yes X No ___ N/A ___ RMK#___

   b. Mix battery types in one container? — Yes ___ No X N/A ___ RMK#___

   c. Discharge batteries to remove the electric charge? — Yes ___ No X N/A ___ RMK#___

   d. Regenerate used batteries? — Yes ___ No X N/A ___ RMK#___

   e. Disassemble them into individual batteries or cells? — Yes ___ No X N/A ___ RMK#___

   f. Remove batteries from consumer products? — Yes X No ___ N/A ___ RMK#___

   g. Remove the electrolyte from the battery? — Yes ___ No X N/A ___ RMK#___

   If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-33(A)(2)] — Yes ❑ No ___ N/A X RMK#___

7. If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)] — Yes ___ No ❑ N/A X RMK#___

   a. If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)] — Yes ___ No ❑ N/A X RMK#___

   b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)] — Yes ___ No ❑ N/A X RMK#___

8. Are the battery(ies) or container(s) of batteries located with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-34(A)] — Yes ___ No ■ N/A ___ RMK#2

UNIVERSAL WASTE PESTICIDES

9. Does the LQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-33(B)(1)] — Yes ___ No ❑ N/A X RMK#___

10. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-33(B)(2)] — Yes ___ No ❑ N/A X RMK#___

11. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 66-992, except for paragraph (C) of 3745-66-97; rule 3745-66-991 and 3745-66-992 of the OAC met? [3745-273-33(B)(3)] — Yes ___ No ❑ N/A X RMK#___

12. Is pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-33(B)(4)] — Yes ___ No ❑ N/A X RMK#___

13. Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)] — Yes ___ No ❑ N/A X RMK#___

14. Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)] — Yes ___ No ❑ N/A X RMK#___

UNIVERSAL WASTE THERMOSTATS

15. Are thermostats that show evidence of leakage, spillage or damage that could cause leaks, properly contained? [3745-273-33(C)(1)] — Yes ___ No ❑ N/A X RMK#___

16. If the thermostats are contained, are the containers closed, structurally sound, compatible with contents of the thermostats and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(C)(1)] — Yes ___ No ❑ N/A X RMK#___

17. If the mercury-containing ampules are removed, does the LQUWH: [3745-273-33(C)(1)]

a. Remove the ampules in a manner to prevent breakage and is the removal done over a containment device? [3745-273-33(C)(2)(a)(b)] — Yes ___ No ❑ N/A X RMK#___

b. Have a clean-up system readily available to transfer spilled material to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-33(C)(2)(c)(d)] — Yes ___ No ❑ N/A X RMK#___

c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-33(C)(2)(e)] — Yes ___ No ❑ N/A X RMK#___

d. Ensure employees are thoroughly familiar with proper waste handling and emergency procedures? [3745-273-33(C)(2)(f)] — Yes ___ No ❑ N/A X RMK#___

e. Ensure removed ampules are stored in closed, non-leaking containers that are in good condition? [3734-273-33(C)(2)(g)] — Yes ___ No ❑ N/A X RMK#___

f. Pack removed ampules in containers with packing material to prevent breaking during storage, handling and transportation? [3745-273-33(C)(2)(h)] — Yes ___ No ❑ N/A X RMK#___

18. If mercury or clean-up residues resulting from spills or leaks or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-33(C)(3)(a)] — Yes ___ No ❑ N/A _X_ RMK#___

a. If the waste is characteristic, was it managed in compliance with 3745-50 through 3745-69? (*The handler is considered the generator of the mercury, residues, and/or other waste and is subject to Chapter 3745-52)* [3745-273-33(C)(3)(b)] — Yes ___ No ❑ N/A _X_ RMK#___

b. If the mercury, residues and/or other waste are not hazardous, are they managed in compliance with applicable law? [3745-273-33(C)(3)(c)] — Yes ___ No ❑ N/A _X_ RMK#___

19. Are the thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)" [3745-273-34] — Yes ___ No ❑ N/A _X_ RMK#___

ACCUMULATION TIME

20. Is the waste accumulated for less than one year? [3745-273-35(A)] — Yes _X_ No ___ N/A ___ RMK#___

a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on handler to demonstrate) [3745-273-35(B)] — Yes ___ No ❑ N/A _X_ RMK#___

NOTE: ***Accumulation is defined as date generated or date received from another handler.***

21. Has the length of time the universal waste has been accumulated documented by ***one*** of the following: [3745-273-35(C)] — Yes _X_ No ❑ N/A ___ RMK#___

a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-35(C)(1)] — Yes _X_ No _ N/A ___ RMK#_3_

b. Marking or labeling the individual item of universal waste with the date that it became a waste or was received? [3745-273-35(C)(2)] — Yes ___ No _X_ N/A ___ RMK#___

c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-35(C)(3)] — Yes ___ No _X_ N/A ___ RMK#___

d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-35(C)(4)] — Yes ___ No X N/A ___ RMK#___

e. Placing the universal waste in a specific accumulation area and identifying the earliest that any universal waste in the area became a waste or was received? [3745-273-35(C)(5] — Yes ___ No X N/A ___ RMK#___

f. Any other method which clearly demonstrates the length of time the universal waste has been accumulated from the date it became a waste or is received? [3745-273-35(C)(6)] — Yes ___ No X N/A ___ RMK#___

EMPLOYEE TRAINING

22. Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36] — Yes X No ❑ N/A ___ RMK#___

RESPONSE TO RELEASES

23. Were releases of universal waste and other residues immediately contained? [3745-273-37(A)] — Yes ___ No ❑ N/A X RMK#___

24. Was the released material characterized? [3745-273-37(B)] — Yes ___ No ❑ N/A X RMK#___

25. If the released material was a hazardous waste, was it managed as required in OAC 3745-50 through 3745-69? *(If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52)* [3745-273-37(C)] — Yes ___ No ❑ N/A X RMK#___

OFF-SITE SHIPMENTS

NOTE: ***If a LQUWH self-transports wastes, then the handler must comply with the Universal Waste transporter requirements.***

26. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)] — Yes X No ❑ N/A ___ RMK#___

NOTE: ***LQUWHs are prohibited to send waste to any other facility.***

27. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-38(C)] — Yes X No ❑ N/A ___ RMK#___

28. Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)] — Yes X No ❑ N/A ___ RMK#___

29. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following: — Yes ___ No ❑ N/A X RMK#___

a. Receive the waste back? [3745-273-38(E)(1)] — Yes___ No___ N/A X RMK#___

b. Agree to where shipment will be sent? [3745-273-38(E)(2)] — Yes___ No___ N/A X RMK#___

30. If a handler rejects a partial or full load from another handler, does the receiver handler contact the originating handler and discuss one of the following: — Yes ___ No ❑ N/A X RMK#___

a. Sending the waste back to originating handler? [3745-273-38(F)(1)] — Yes___ No___ N/A X RMK#___

b. Sending the shipment to a destination facility? [3745-273-38(F)(2)] — Yes___ No___ N/A X RMK#___

31. If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)] — Yes ___ No ❑ N/A X RMK#___

32. If the handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-38(H)] — Yes ___ No ❑ N/A X RMK#___

TRACKING UNIVERSAL WASTE SHIPMENTS

33. Are universal waste received from another handler? If so: Yes___ No_X_ N/A ___RMK#___

a. Is a record of each shipment kept? [3745-273-39(A)] Yes ___ No ❑ N/A _X_ RMK#___

NOTE: ***This record can be in the form of a log, invoice, manifest, bill of lading, or other shipping document. This also applies to question No. 35(a).***

34. Does the record include the following:

a. Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)] Yes ___ No ❑ N/A _X_ RMK#___

b. Quantity of each type of universal waste? [3745-273-39(A)(2)] Yes ___ No ❑ N/A _X_ RMK#___

c. Date received? [3745-273-39(A)(3)] Yes ___ No ❑ N/A _X_ RMK#___

35. Is universal waste shipped to another handler? If so: Yes___ No___ N/A _X_RMK#___

a. Is a record of each shipment kept? [3745-273-39(B)] Yes ___ No ❑ N/A _X_ RMK#___

36. Does the record include the following?

a. Name and address of universal waste handler, destination facility, or foreign destination? [3745-273-39(B)(1)] Yes ___ No ❑ N/A _X_ RMK#___

b. Quantity of each type of universal waste? [3745-273-39(B)(2)] Yes ___ No ❑ N/A _X_ RMK#___

c. Date shipped? [3745-273-39(B)(3)] Yes ___ No ❑ N/A _X_ RMK#___

37. Are records kept for three years? [3745-273-39(C)(1)(2)] Yes _X_ No ❑ N/A ___ RMK#___

EXPORTS

38. Is waste being sent to a foreign destination? If so: Yes ___ No _X_ N/A ___ RMK#___

a. Does the large quantity handler comply with primary exporter requirements in OAC rules 3745-52-53 and 3745-52-57, and paragraphs (A)(1) - (A)(6) and (B) of 3745-52-56? [3745-273-40(A)] Yes ___ No ❑ N/A _X_ RMK#___

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA "Acknowledgment of Consent" 37845-52-50 to -52-57? [3745-273-40(B)] Yes ___ No ❑ N/A _X_ RMK#___

c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)] Yes ___ No ❑ N/A _X_ RMK#___

REMARKS

#2 The batteries were not individually labeled as required.
#3. The stack of baterries was labeled with the accumulation date; however the batteries were not in a container.

LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] **If so**: Yes X No ❑ N/A ___RMK#___

   a. **For determinations based solely on knowledge of the waste:** Is supporting data retained on-site? [3745-270-07(A)(6)] Yes X No ❑ N/A ___RMK#___

   b. **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes X No ❑ N/A ___RMK#___

2. Has the generator determined each Ohio EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2), see Table 1] Yes X No ❑ N/A ___RMK#___

3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes X No ❑ N/A ___RMK#___

4. Does the generator generate a characteristic hazardous waste? **If so:** Yes X No___ N/A ___RMK#___

   a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes X No ❑ N/A ___RMK#___

NOTE: *If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.*

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] **If so:** Yes X No___ N/A ___RMK#___

   a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes X No ❑ N/A ___RMK#___

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]*

6. Has the generator **correctly** determined if restricted wastes meet or exceed treatment standards? [3745-270-07(A)(1)] Yes X No ❑ N/A ___RMK#___

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

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

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

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes ❑ No___ N/A X RMK#___

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] **If so:** Yes___ No X N/A ___RMK#___

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

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

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

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

    a. Has the facility complied with 3745-270-04? Yes ___ No ❑ N/A X RMK#___

REMARKS

NOTIFICATION AND CERTIFICATION REQUIREMENTS

12. If a generators' waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1? [3745-270-07(A)(2)] — Yes _X_ No ❑ N/A ___ RMK#___

13. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1? [3745-270-07(A)(3)] — Yes ___ No ❑ N/A _X_ RMK#___

14. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1? [3745-270-07(A)(4)] — Yes ___ No ❑ N/A _X_ RMK#___

15. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1? [3745-270-07(A)(9)] — Yes ___ No ❑ N/A _X_ RMK#___

16. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] **If so:** — Yes ___ No_X_ N/A ___ RMK#___

    a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] — Yes ___ No ❑ N/A _X_ RMK#___

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

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

REMARKS

STATE PART B HAZARDOUS WASTE PERMIT INSPECTION CHECKLIST

DIVISION OF HAZARDOUS WASTE MANAGEMENT
OHIO EPA
July 2002

Table of Contents
Portsmouth Gaseous Diffusion Plant
04-66-0680

RCRA Inspection Checklist 1

General Conditions of Permit 2
General Permit Compliance and Activities 2

Permit Modification, Revision, Revocation 5

Site Entry - Availability of Records 7

Recordkeeping Requirements 7
Confidentiality 7
Operating Record 7
Annual Report Requirement 9
Sampling/monitoring Recordkeeping Requirements 9
Waste Minimization Requirements 10

Off-site Shipments/manifest Requirements 11
Manifest Requirements/wastes Received On-site 11

Waste Analysis/waste Analysis Plan 11
General Requirements 12
Waste Analysis Quality Assurance Requirements 12

General Inspection Requirements 14

ecurity Provisions/facility Operation 15

Personnel Training 16

Required Equipment 16

Contingency Plan Requirements 17
Emergency Procedures 17
Emergency Authorities 18
Emergency Coordinator 18
Amendment of Plan 18
Implementation of Plan 19

Contingency Plan Requirements 20
Closure Plan/amendment 20
Closure Activities 20

Requirements for Ignitable, Reactive or Incompatible Wastes 22

Storage of Hazardous Wastes in Containers 24
Condition of Containers 25
Inspections 25
Containment System 26
Required Aisle Space 27
Closure and Post-closure 27
Container Storage of Residual Waste 27

Land Disposal Restriction Requirements 28
Prohibition Against Dilution 28
Generator Requirements 28

Notification/certification 29
Storage of Land Disposal Restricted Wastes 31

OHIO PART B PERMITTED FACILITY
RCRA INSPECTION CHECKLIST

acility: Portsmouth Gaseous Diffusion Plant Ohio Permit #: 04-66-0680

Co-operator: Bechtel Jacobs Company LLC

Address: 3930 U.S. Route 23 South
Piketon, OH 45661

USEPA ID#: OH7890008983
Facility Phone: 740-897-5010

County: Pike Time: 9:30 - 3:00 & 9:00 - 4:00

Inspection Date: 2/10/04 & 2/11/04

Advance notice of inspection given?___(Yes) X (No)
If so, how far in advance? _____

	Name	***Agency/Title***	***Phone***
Inspector(s):	Jim Michnowicz	Ohio EPA	740-385-8501
	Melody Stewart	Ohio EPA	740-380-5256
Facility	Dee Perkins	USDOE	740-897-5010
	John Saluke	USDOE	740-897-5010
epresentative(s):	Mary Williams	Bechtel Jacobs	740-897-2700
	Sandy Childers	Bechtel Jacobs	740-897-2700

Is facility operating as a generator? Yes X No _____

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

PERMIT STATUS

Permit Issued: March 15, 2001
Permit Effective Date: March 15, 2001
Permit Expiration Date: March 15, 2006

	STORAGE		**TREATMENT**		**DISPOSAL**
X	Container		Tank		Injection Well
	Tank		Surface Impoundment		Landfill
	Waste Pile		Incinerator		Land Application
	Surface Impoundment		Thermal Treatment		Surface Impoundment

GENERAL CONDITIONS OF PERMIT

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1. Has the expiration date of the permit passed? If so: Yes__No_X_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 _X_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? (Or upon a later date if the permittee can demonstrate good cause for late submittal.) [Condition A.6.(a)] Yes__No__ N/A _X_RMK#__

NOTE: *The permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:*

   A. The permittee has submitted a timely and complete application for a renewal permit under OAC rule 3745-50-40; and

   B. Through no fault of the permittee, a new permit has not been issued pursuant to OAC rule 3745-50-40 on or before the expiration date of the permit. [Condition A.6.(b)]

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.26] Yes_X_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? [Condition A.1.(b) and A.5] Yes__No_X_ N/A ___RMK#__

4. Have any provisions of the permit been identified as invalid? [Condition A.4.] Yes__No_X_ N/A ___RMK#__

5. Has the facility identified any instances of noncompliance with the permit, RC Chapter 3734. or the rules adopted thereunder, which may endanger human health or the environment? If so: Yes__No_X_ N/A ___RMK#__

   a. Did the facility immediately report orally the following to Ohio EPA's Emergency Response Section within 24 hours of becoming aware of the circumstance(s): [Condition A.20.(a)]

i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and — Yes__No__ N/A _X_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 or operator? — Yes__No__ N/A _X_RMK#__

B. Name, address and telephone number of the facility? — Yes__No__ N/A _X_RMK#__

C. Name and quantity of material(s) involved? — Yes__No__ N/A _X_RMK#__

D. The extent of injuries, if any? — Yes__No__ N/A _X_RMK#__

E. An assessment of the actual or potential hazard to the environment and human health outside the facility where this is applicable? — Yes__No__ N/A _X_RMK#__

F. Estimated quantity and disposition of recovered material that resulted from the incident? — Yes__No__ N/A _X_RMK#__

6. Did the permittee provide a written report to Ohio EPA's Emergency Response Section and DHWM, SEDO within five days of the time the permittee became aware of the circumstances reported in Question 5? [Condition A.21.] If so did the report contain: — Yes__No__ N/A _X_RMK#__

a. A description of the noncompliance and its cause (including exact dates and times)? — Yes__No__ N/A _X_RMK#__

b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? — Yes__No__ N/A _X_RMK#__

c. Steps taken or planned to minimize the impact on human health and the environment and to reduce and prevent recurrence of the noncompliance? — Yes__No__ N/A _X_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 becomes aware of the circumstances. [Condition A.21.(c)]*

7. Has the permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8] — Yes__No__ N/A _X_RMK#__

8. Has the permittee identified any other instances of noncompliance not provided for in Question 5? — Yes__No__ N/A _X_RMK#__

   a. If so, did the permittee report to the director within a month of the time at which the permittee is aware of such noncompliance? [Condition A.22.] — Yes__No__ N/A _X_RMK#__

   b. Do the reports provided contain the information set forth in Condition A.20? — Yes__No__ N/A _X_RMK#__

9. Has the permittee planned any physical alterations or additions to the permitted facility? — Yes__No_X_ N/A ___RMK#__

   a. If so, has the facility provided Ohio EPA with notice of such changes? [Condition A.15] — Yes__No__ N/A _X_RMK#__

Note: *Such notification does not waive the permittee's duty to comply with the permit pursuant to Condition A.5.*

REMARKS

ERMIT MODIFICATION, REVISION, REVOCATION

1. Has the permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.] — Yes X No ___ N/A ___ RMK#___

2. Has the permit been transferred to a new owner or operator? [Condition A.18.] If so, — Yes ___ No X N/A ___ RMK#___

   a. Has the transfer been conducted in accordance with R.C. Chapter 3734. and the rules adopted thereunder? [Condition A.18.]; and — Yes ___ No ___ N/A X RMK#___

   b. Before transferring ownership did the permittee notify the new owner in writing of the requirements of R.C. Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.18.] — Yes ___ No ___ N/A X RMK#___

3. Has the permittee submitted reports of compliance or noncompliance with, or any progress reports on the requirements contained 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 X RMK#___

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

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

6. 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 HWFB? If so, — Yes ___ No X N/A ___ RMK#___

   a. Has the permittee promptly submitted such facts or corrected information to the appropriate entity? [Condition A.24.] — Yes ___ No ___ N/A X RMK#___

7.	Is the permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications to the application? [Condition A.14.(c)]	Yes X No___ N/A ___RMK#___
8.	Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14.(c)]	Yes X No___ N/A ___RMK#___

REMARKS

TE ENTRY - AVAILABILITY OF RECORDS

1. As specified in Condition A.11., has the permittee allowed the director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection, 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 X No ___ N/A ___ RMK#___

   b. Have access to and copy any records required to be kept under the conditions of the permit? — Yes X No ___ N/A ___ RMK#___

   c. Inspect at reasonable times facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit? — Yes X No ___ N/A ___ RMK#___

   d. Sample, document, or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by R.C. Chapter 3734. and the rules adopted thereunder? — Yes X No ___ N/A ___ RMK#___

RECORDKEEPING REQUIREMENTS

CONFIDENTIALITY

1. Has the permittee requested confidentiality of any information of the permit in accordance with R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.25.] — Yes ___ No X N/A ___ RMK#___

OPERATING RECORD

2. Is the permittee maintaining a written operating record at the facility as set forth in OAC rule 3745-54-73 and Condition B.22. of the permit which contains the following elements:

   a. A description and the quantity of each hazardous waste received? — Yes X No ___ N/A ___ RMK#___

b. Method(s) and date(s) of treatment, storage or disposal at the facility? Yes X No___ N/A ___RMK#___

c. The location of each hazardous waste within the facility and the quantity at each location? Yes X No___ N/A ___RMK#___

3. Is the permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents as part of its operating record: [Condition A.28.]

a. Waste analysis plan in accordance with OAC rule 3745-54-13 and the conditions of the permit? Yes X No___ N/A ___RMK#___

b. Contingency plan in accordance with OAC rule 3745-54-53 and the conditions of the permit? Yes X No___ N/A ___RMK#___

c. Closure plan in accordance with OAC rule 3745-55-12 and the conditions of the permit? Yes X No___ N/A ___RMK#___

d. Personnel training plan and records required by OAC rule 3745-54-16 and the conditions of the permit? Yes X No___ N/A ___RMK#___

e. Inspection schedules developed in accordance with OAC rules 3745-54-15 and 3745-55-74 and the conditions of the permit? Yes X No___ N/A ___RMK#___

4. Have any of the documents identified in Question #3 been revised as required by the permit? If so, Yes X No___ N/A ___RMK#___

a. Has the permittee submitted the revisions to Ohio EPA? [Condition A.28.(b)] Yes X No___ N/A ___RMK#___

b. Has the permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.28.(b)] Yes X No___ N/A ___RMK#___

5. Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from the date of inspection? [Condition A.28.(c)] Yes X No___ N/A ___RMK#___

NNUAL REPORT REQUIREMENT

6. 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 and the conditions of the permit? [Condition B.25.] Yes X No___ N/A ___RMK#___

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

7. In compliance with Condition A.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 X No___ N/A ___RMK#___

   b. Individual(s) who performed the sampling or measurement? Yes X No___ N/A ___RMK#___

   c. Date(s) analyses were performed? Yes X No___ N/A ___RMK#___

   d. Individual(s) who performed the analyses? Yes X No___ N/A ___RMK#___

   e. Analytical technique(s) or method(s) used? Yes X No___ N/A ___RMK#___

   f. Results of such analyses? Yes X No___ N/A ___RMK#___

8. 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 A.12.(a)] Yes X No___ N/A ___RMK#___

9. Has Ohio EPA requested submittal of any reports or other information required by the conditions of the permit from the permittee? If so, Yes___No X N/A ___RMK#___

   a. Have the submittals been signed and certified according to OAC rules 3745-50-58(K) and 3745-50-42? [Condition A.13.] Yes___No___ N/A X RMK#___

WASTE MINIMIZATION REQUIREMENTS

10. Has the permittee submitted a Waste Minimization Report to Ohio EPA meeting the requirements of Condition A.29. of the permit within 180 days of permit journalization? Yes X No___ N/A ___RMK#___

    a. Following the first submittal as identified above in Question #10, has the permittee submitted biennial updates to this report as required by Condition A.29.(c)? Yes X No___ N/A ___RMK#___

REMARKS

FF-SITE SHIPMENTS/MANIFEST REQUIREMENTS

1. Is all hazardous and mixed waste transported from the facility by a properly registered transporter of hazardous and mixed waste in accordance with all applicable laws, rules and standards? [Condition A.16.] — Yes X No__ N/A ___RMK#___

MANIFEST REQUIREMENTS/WASTES RECEIVED ON-SITE

2. Upon receipt of the manifests, has the permittee signed and dated each copy of the manifest? [OAC 3745-54-71(A)(1); Condition B.24.] — Yes X No__ N/A ___RMK#___

3. For any significant discrepancies identified upon receipt of the manifest(s): did the permittee note such discrepancies on the manifest(s) in accordance with OAC rule 3745-54-71(A)(2) and Condition B.24? — Yes__No__ N/A X RMK#___

   a. Did the permittee attempt to reconcile the discrepancy? [Condition B.24.] — Yes__No__ N/A X RMK#___

   b. If the discrepancy was not resolved within 15 days: did the permittee submit a report, including a copy of the manifest, to the director in accordance with OAC rule 3745-54-72(B)? [Condition B.24.] — Yes__No__ N/A X RMK#___

4. Does the permittee immediately give the transporter at least one copy of the signed manifest? [OAC 3745-54-71(A)(3); Condition B.24.] — Yes X No__ N/A ___RMK#___

5. Does the permittee provide the generator with a copy of the manifest within 30 days of receipt of waste on-site? [OAC 3745-54-71(A)(4); Condition B.24.] — Yes X No__ N/A ___RMK#___

6. Does the permittee retain a copy of each manifest on-site for at least three years from the date of delivery? [OAC 3745-54-71(A)(5); Condition B.24.] — Yes X No__ N/A ___RMK#___

7. Has the permittee received any hazardous waste or mixed waste from off-site, other than as described in Condition B.2(b)? — Yes__No X N/A ___RMK#___

WASTE ANALYSIS/WASTE ANALYSIS PLAN

GENERAL REQUIREMENTS

1. Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information which is necessary to properly treat, store or dispose of the waste in accordance with OAC Chapters 3745-54 to 3745-57 and Condition B.3 of the permit (Section C of the approved permit application)? [OAC 3745-54-13(A)(1)] — Yes X No___ N/A ___RMK#___

2. Since the last inspection, were any wastes generated by the facility which were unable to be characterized through process knowledge? If so, — Yes___No X N/A ___RMK#___

   a. Were the waste analysis procedures described in Section C of the approved permit application followed? — Yes___No___ N/A X RMK#___

3. Is the permittee following the procedures described in the approved waste analysis plan (Section C of approved permit application) and the requirements of OAC rule 3745-54-13? [Condition B.3.] — Yes X No___ N/A ___RMK#___

4. Is the permittee maintaining waste analysis data in the facility's operating record as required by OAC rule 3745-54-73 and Condition B.22. of the permit? — Yes X No___ N/A ___RMK#___

WASTE ANALYSIS QUALITY ASSURANCE REQUIREMENTS

5. Is the permittee verifying the analysis of each waste stream annually as part of its quality assurance program in accordance with SW-846? [Condition B.3.] — Yes X No___ N/A ___RMK#_

6. In accordance with Condition B.3. of the permit, does the permittee's quality assurance plan ensure that the permittee is, at a minimum:

   a. Maintaining property functional instruments? — Yes X No___ N/A ___RMK#___

   b. Using approved sampling/analytical methods? — Yes X No___ N/A ___RMK#___

   c. Verifying the validity of sampling and analytical procedures and performance of correct calculations? — Yes X No___ N/A ___RMK#___

7. If the permittee uses a contract laboratory to perform analyses, did the permittee inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this permit? Yes X No___ N/A ___RMK#___

REMARKS

GENERAL INSPECTION REQUIREMENTS

1. Is the permittee following the inspection procedures and schedules described in Section F of the approved permit application and the requirements of OAC rule 3745-54-15? [Condition B.5.] Yes X No___ N/A ___RMK#___

2. Does the permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [OAC 3745-54-15(A)(1)(2)] Yes X No___ N/A ___RMK#___

3. 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? Yes X No___ N/A ___RMK#___

   a. Is the schedule kept at the facility? [OAC 3745-54-15(B)(2)] Yes X No___ N/A ___RMK#___

   b. Does the schedule identify the types of problems which are to be looked for during the inspection? [OAC 3745-54-15(B)(3)] Yes X No___ N/A ___RMK#___

   c. Does the schedule include inspection of areas subject to spills daily when in use and according to other applicable regulations when not in use? [OAC 3745-54-15(B)(4)] Yes X No___ N/A ___RMK#___

4. 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 X No___ N/A ___RMK#___

5. Is the permittee maintaining records of inspections for a minimum of three years? [Condition B.5.] Yes X No___ N/A ___RMK#___

6. 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 X No___ N/A ___RMK#___

   b. Signature of inspector? Yes X No___ N/A ___RMK#___

c. Notation of observations made? Yes X No___ N/A ___RMK#___

d. Date/nature of any repairs or other remedial actions? Yes X No___ N/A ___RMK#___

SECURITY PROVISIONS/FACILITY OPERATION

1. Is the permittee complying with the security provisions of OAC rule 3745-54-14(B)(1) and B(2) and (C) and Section F of the approved permit application, including the following: [Condition B.4.]

   a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility; Yes X No___ N/A ___RMK#___

   b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility; or Yes X 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 X No___ N/A ___RMK#___

2. In accordance with OAC rule 3445-54-14(C), does the permittee have signs reading "Danger-Unauthorized Personnel Keep Out" posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? [Condition B.4.] Yes X No___ N/A ___RMK#___

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 waters? [Condition B.1.] Yes X No___ N/A ___RMK#___

PERSONNEL TRAINING

1. Is the facility conducting personnel training in accordance with Section H of the approved permit application and the following requirements of OAC rule 3745-54-16: [Condition B.6.]

   a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC 3745-54-16(A)(B)(C)] — Yes X 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 3745-54-16(B)? — Yes X No ___ N/A ___ RMK#___

   c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(B)? — Yes ___ No X N/A ___ RMK# 1

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 X No ___ N/A ___ RMK#___

REQUIRED EQUIPMENT

1. Is the permittee, at a minimum, maintaining the equipment set forth in the approved permit application (Section G) at the facility? [Condition B.9.] — Yes X No ___ N/A ___ RMK#___

2. Is the permittee inspecting, testing, and maintaining the equipment specified in Question #1 to assure its proper operation as specified in OAC rule 3745-54-33, the inspection plans and Section G of the approved permit application? [Condition B.10.] — Yes X 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 Section G of the approved permit application? [Condition B.11.] — Yes X No ___ N/A ___ RMK#___

ONTINGENCY PLAN REQUIREMENTS

EMERGENCY PROCEDURES

1. In compliance with Condition B.13.(a) of the permit, does the permittee:

   a. Familiarize the emergency response agencies likely to respond to an emergency at the facility with:

      i. The location and layout of the facility? Yes X No__ N/A ___RMK#___

      ii. Properties of hazardous waste and mixed waste managed at the facility and associated hazards? Yes X No__ N/A ___RMK#___

      iii. Places where facility personnel will normally be working? Yes X No__ N/A ___RMK#___

      iv. Entrances to and roads inside the facility? Yes X No__ N/A ___RMK#___

      v. Evacuation routes as depicted in Section G of the permit application? Yes X No__ N/A ___RMK#___

   b. Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the facility, and any further requirements imposed by the permit?; and Yes X No__ N/A ___RMK#___

   c. Familiarize local police and fire departments, local hospitals and other local emergency services with the properties of hazardous waste and mixed waste managed at the facility and the types of injuries which could result from fires, explosions or a release of hazardous wastes at the facility? Yes X No__ N/A ___RMK#___

2. Is the permittee in compliance with the requirements of OAC rule 3745-54-56 and Section G of the approved permit application regarding emergency procedures? [Condition B.20.] Yes X No__ N/A ___RMK#___

EMERGENCY AUTHORITIES

3. 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_X_ 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 _X_RMK#___

4. 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.] — Yes_X_No___ N/A ___RMK#___

5. Has the permittee notified the agencies in Question #4, in writing, within ten days of the effective date of any amendments or revisions to the Plan? [Condition B.18.(b)] — Yes_X_No___ N/A ___RMK#___

6. 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 in accordance with OAC rule 3745-54-53? [Condition B.18.(c)] — Yes_X_No___ N/A ___RMK#___

EMERGENCY COORDINATOR

7. Is the permittee in compliance with the requirements of OAC rule 3745-54-55 with regard to the emergency coordinator? [Condition B.19.] — Yes_X_No___ N/A ___RMK#___

AMENDMENT OF PLAN

8. Is the permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17.] — Yes_X_No___ N/A ___RMK#___

Note: *Also see Question #4 of RECORDKEEPING REQUIREMENTS to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.*

IPLEMENTATION OF PLAN

9. Has there been a fire, explosion or release of hazardous waste or mixed waste or constituents at the facility since the last date of inspection as described by Condition B.14. of the permit? If so, — Yes__No_X_ 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? [Condition B.14.] — Yes__No__ N/A _X_RMK#___

   b. Did the permittee collect and manage released material, emergency response material and by-products as hazardous waste or mixed waste until making a demonstration to Ohio EPA that such materials are not subject to Ohio hazardous waste rules? [Condition B.16.] — Yes__No__ N/A _X_RMK#___

   c. 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 _X_RMK#___

      i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23.] ***Note:*** *See also Conditions A.21. and A.22. of the permit for additional reporting/recordkeeping requirements.* — Yes__No__ N/A _X_RMK#___

   d. 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? [Condition B.23.] — Yes__No__ N/A _X_RMK#___

REMARKS

CONTINGENCY PLAN REQUIREMENTS

CLOSURE PLAN/AMENDMENT

1. Is the permittee maintaining at the facility, the approved closure plan which contains the elements set forth in OAC rule 3745-55-12? [Condition B.29.] — Yes X No___ N/A ___RMK#___

2. Has the permittee amended the closure plan? If so, — Yes___No X N/A ___RMK#___

   a. Has the plan been amended in accordance with OAC rule 3745-55-12(C)? [Condition B.28.] — Yes___No___ N/A _X_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.*

CLOSURE ACTIVITIES

3. Has the permittee closed the facility? If so, — Yes___No X N/A ___RMK#___

   a. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26.] — Yes___No___ N/A _X_RMK#___

   b. Did the permittee carry-out the approved closure plan as set forth in the permit application and terms and conditions of the permit? [Condition B.26.] — Yes___No___ N/A _X_RMK#___

   c. After receiving the final volume of hazardous waste, did the permittee remove from the facility all hazardous waste and mixed 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 _X_RMK#___

   d. 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 _X_RMK#___

   e. Did the permittee notify Ohio EPA's Southeast District Office within five working days prior to all rinseate and soil sampling? [Condition B.32.(b)] — Yes___No___ N/A _X_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 _X_RMK#__

REMARKS

REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

1. Is the permittee following the procedures as specified in OAC rules 3745-54-17, 3745-55-77 and Section F of the approved application when managing ignitable, reactive and/or incompatible wastes? [Conditions B.7.(a) and C.10. and C.11.] Yes X No___ N/A ___RMK#___

2. Does the permittee ***not*** store incompatible waste ***except*** in accordance with OAC rules 3745-54-17(B) and 3745-55-77, and the terms and conditions of this permit? [Condition C.11.(a)] Yes X No___ N/A ___RMK#___

3. Does the permittee take precautions to prevent placing hazardous waste or mixed waste in an unwashed container that previously held an incompatible waste or material? [Condition C.11.(b)] Yes X No___ N/A ___RMK#___

4. Does the permittee ensure that all containers of incompatible wastes are physically separated from other incompatible wastes or materials by a wall, berm, dike, or other device in accordance with OAC rule 3745-55-77 and the Appendix to OAC rule 3745-55-99? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

   a. Are all containers of aqueous hazardous acids (ph $\leq$ 2) and caustics ph $\geq$ 12.5) sorted on different pallets and physically separated in different rooms? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

   b. Are aqueous acids and caustics in poly bottles, and other containers requiring nuclear criticality safety spacing physically separated in the same room by a dike? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

   c. Are containers of cyanides and sodium metals being stored in rooms physically separate from other incompatible wastes or other incompatible materials? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

5. Does the permittee provide electrical grounding for all containers, tanks and transport vehicles during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(b)] Yes X No___ N/A ___RMK#___

	Does the permittee provide and require the use of spark proof tools during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(c)]	Yes X No___ N/A ___RMK#___
7.	Does the permittee prohibit smoking and open flames in areas where hazardous wastes are managed and post appropriate signs? [Condition B.7.(d)]	Yes X No___ N/A ___RMK#___
8.	As required by OAC rule 3745-55-76, does the permittee store containers of ignitable or reactive wastes greater than 15 meters (50 feet) away from the Portsmouth Gaseous Diffusion Plant reservation boundary? [Condition C.10.(a)]	Yes X No___ N/A ___RMK#___

REMARKS

STORAGE OF HAZARDOUS WASTES IN CONTAINERS

NOTE: *The requirements of permit 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.*

1. Is the permittee storing in containers, only those wastes as specified in Section A of the Part B permit application? [Condition C.1.(a), C.2.] Yes X No___ N/A ___RMK#___

2. Does the permittee limit the total quantity of containerized waste in the container storage area to 133,000 gallons at any given time in the permitted container areas, located in building X-326 and no more than 5,456,000 gallons at any given time in the permitted storage areas located in building X-7725? [Condition C.1.(a)] Yes X No___ N/A ___RMK#___

NOTE: *For the purposes of compliance with the capacity limitation of the permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity. For example, a 55-gallon drum will be considered to be holding 55 gallons of waste, regardless of the actual quantity stored in the drum. [Condition C.1.(b)]*

3. When accumulating waste within the permitted X-7725 and X-326 container storage area, does the permittee ensure that the total amount of waste (both > 90 days and < 90 days) does not exceed the maximum container storage inventory established under Condition C.1.? [Condition C.1.(c)] Yes X No___ N/A ___RMK#___

4. Are hazardous wastes subject to regulation by the permit stored only at the designated container storage area described in the approved permit application? (See Section D of the permit application) [Condition C.1.(a)] Yes X No___ N/A ___RMK#___

5. Is each container stored clearly marked to identify its contents and the date each period of accumulation/storage begins? (See Section D of the permit application) [Condition C.3.] Yes X No___ N/A ___RMK#___

6. Does the permittee store hazardous waste in the types of containers described in Section D of the approved permit application? [Condition C.1.(a)] Yes X No___ N/A ___RMK#___

Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g., wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [OAC rule 3745-270-07; Condition B.36.(e)] Yes X No___ N/A ___RMK#___

5. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [OAC rule 3745-270-07(A); Condition B.36.(e)] Yes X No___ N/A ___RMK#___

6. Does the entity generate any listed waste(s) which are restricted from land disposal? If so, Yes X No___ N/A ___RMK#___

   a. Do such wastes also exhibit hazardous waste characteristics as identified in OAC rules 3745-51-20 to 3745-51-24? Yes X No___ N/A ___RMK#___

   b. ***For listed wastes which also exhibit a characteristic*:** Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [OAC rule 3745-270-09(A)] Yes X No___ N/A ___RMK#___

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC rule 3745-270-09(B)].*

NOTIFICATION/CERTIFICATION

7. ***For wastes that do not meet treatment standards:*** Has the generator submitted a one-time written notice to the treatment/storage facility receiving the wastes, that wastes being received do not meet treatment standards? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No___ N/A ___RMK#___

   If so, does the notice including the following:

   a. EPA hazardous waste number? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No___ N/A ___RMK#___

   b. Appropriate treatment standard for the waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No___ N/A ___RMK#___

c. The manifest number associated with the first shipment of waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No___ N/A ___RMK#___

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No___ N/A ___RMK#___

e. Applicable wastewater/non-wastewater category [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No___ N/A ___RMK#___

f. For hazardous debris, list the contaminants subject to treatment, as described in paragraph (B) of OAC rule 3745-270-45; and an indication that these contaminants are being treated to comply with OAC rule 3745-270-45. — Yes X No___ N/A ___RMK#___

g. For contaminated soil list the constituents subject to treatment as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. — Yes X No___ N/A ___RMK#___

8. ***For wastes that meet treatment standards:*** Does the generator submit a one-time written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes___No___ N/A _X_RMK#___

If so, does the notice/certification including the following:

a. EPA hazardous waste identification number? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes___No___ N/A _X_RMK#___

b. The corresponding treatment standards and applicable prohibitions for the waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes___No___ N/A _X_RMK#___

c. The manifest number associated with the shipment of waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes___No___ N/A _X_RMK#___

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__No__ N/A _X_RMK#__

e. Is the certification signed by the generator or an authorized representative? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__No__ N/A _X_RMK#__

f. For contaminated soil list the constituents subject to treatment as described as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. — Yes__No__ N/A _X_RMK#__

9. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years? [OAC rule 3745-270-07(A)(8); Condition B.36.(j)] — Yes_X_No__ N/A ___RMK#__

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

NOTE: *The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate LDR wastes that do not meet treatment standards in tanks or containers. A LQG who stores LDR wastes on-site for greater than 90 days becomes a operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.*

NOTE: *The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [OAC rule 3745-270-50(E); 40 CFR 268.50(e)]*

10. Is the owner/operator storing LDR restricted wastes in containers? If so, is each container marked with the following information in accordance with OAC rule 3745-270-50(A)(2)(a) [Condition B.36(l)] — Yes_X_No__ N/A ___RMK#__

a. The identification of the contents? — Yes_X_No__ N/A ___RMK#__

b. The date which accumulation began? — Yes_X_No__ N/A ___RMK#__

NOTE: *A TSD facility may store LDR wastes on-site for the purpose of accumulating a sufficient amount c waste for proper recovery, treatment or disposal. [OAC rule 3745-270-50(B)]. During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.*

11. Are LDR wastes being stored at the facility for greater than one year? If so,

    a. Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [OAC rule 3745-270-50(B); Condition B.36(m)] — Yes_X_No___ N/A ___RMK#___

Land and Chemicals Division

Type of Document:
_ Notice of Violation and Inspection Report/Checklist
X No Violation Letter and Inspection Report/Checklist
_ Letter of Acknowledgment
_ Information Request
_ Pre-Filing and Opportunity to Confer
_ State Notification of Enforcement Action

Facility Name : Portsmouth Gaseous Diffusion Plant

Facility Location: 3930 U.S. Route 23 South

City: Piketon **State: Ohio**

U.S. EPA ID# OH7 890 008 983

Assigned Staff W. Francis **Phone: 312-353-4921**

Name	Signature	Date
Author **W. Francis**	W.	5/23/2011
Regional Counsel	----------	
Section Chief **P. Little**		5-23-11
Acting Branch Chief **M. Setnicar**		5/23/11

MG 5/23

Directions/Request for Clerical Support:
After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file.
3. Make any additional copies for cc=s or bcc=s.
4. Mail the original certified mail and distribute office copies and cc=s and bcc=s.
   Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 2 4 2011

REPLY TO THE ATTENTION OF LR-8J

CERTIFIED MAIL 7009 1680 0000 7672 2124
RETURN RECEIPT REQUESTED

William E. Murphie
Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

Mr. Woodrow B. Jameson
Fluor-B&W Portsmouth, LLC
P.O. Box 548
Piketon, Ohio 45661

Re: Compliance Evaluation Inspection
Portsmouth Gaseous Diffusion Plant, Piketon, Ohio
OH7 890 008 983

Dear Messrs Murphie and Jameson:

On July 12, 2010, representatives of the U. S. Environmental Protection Agency and Ohio Environmental Protection Agency (Ohio EPA) inspected the Portsmouth Gaseous Diffusion Plant located near Piketon, Ohio (the facility). The purpose of the inspection was to evaluate your facility's compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA) and your RCRA Permit, specifically the standards applicable to generators of hazardous waste, storage of hazardous waste, universal waste, and used oil. Enclosed, please find a copy of the inspection report.

As of this writing, based upon information available to EPA and Ohio EPA, our review of the inspection has not resulted in the detection of violations of any of the specific RCRA requirements under evaluation. This determination does not limit the applicability of the requirements evaluated, other RCRA regulations, or regulations under other environmental statutes. EPA and Ohio EPA will continue to evaluate your facility in the future.

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

If you have any questions or concerns regarding this matter, please contact Walt Francis, of my staff, at 312-353-4921.

Sincerely,

Mary S. Setnicar
Acting Chief, RCRA Branch
Land and Chemicals Division

Enclosures

cc: Melody Stewart, Ohio EPA - Southeast District Office
(melody.stewart@epa.state.oh.us)

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME:	**PORTSMOUTH GASEOUS DIFFUSION PLANT**
FACILITY U.S. EPA ID NO.:	**OH7 890 008 983**
FACILITY TYPE:	**Large Quantity Generator/Container Storage Facility**
FACILITY ADDRESS:	3930 US Route 23 South Piketon, Ohio 45661
U.S. EPA REPRESENTATIVE:	Walt Francis
DATE(S) OF INSPECTION:	July 12, 2010
SIC CODE:	**2819** - Industrial Inorganic Chemicals, Not Elsewhere Classified
NAICS CODE:	**325188** - All Other Basic Inorganic Chemical Manufacturing

PREPARED BY: Walt Francis — 8/2/2010

Walt Francis
Environmental Scientist
Date

ACCEPTED BY: for — 8/2/10

Paul Little, Chief
Compliance Section 2
RCRA Branch
Date

Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the U.S. Department of Energy Portsmouth Gaseous Diffusion Plant (Portsmouth), Piketon, Ohio to determine its compliance with the Resource Conservation and Recovery Act (RCRA), the Ohio Administrative Code (OAC), and the RCRA Permit requirements with respect to U.S. DOE's management of hazardous waste, universal waste and used oil.

Participants

U.S. Environmental Protection Agency (U.S. EPA) Inspector -
Walt Francis, Environmental Scientist

Ohio Environmental Protection Agency (Ohio EPA) Inspector -
Melody Stewart, Hazardous Waste Inspector

Representatives of U.S. DOE, LATA/Parallax, and Wastren-EnergyX Mission Support, LLC (WEMS) -
Kristi Wiehle, U.S. DOE
Rosemary Richmond, LATA/Parallax Portsmouth, LLC
Robert Anderson, Wastren-EnergyX Mission Support, LLC (WEMS)
Chris Guilliams, LATA/Parallax Portsmouth, LLC
Mike Kienbusch, LATA/Parallax Portsmouth, LLC
Mitch Newman, LATA/Parallax Portsmouth, LLC
Amy Lawson, Restoration Services, Inc.

Site Description/Background Information

Historically, the main function of the Portsmouth facility was to enrich uranium for military use (nuclear submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in uranium hexafluoride (UF6) feedstock which contains 0.711% U235. The Plant had produced enriched uranium continuously since September 1954. In 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). U.S. DOE retained ownership of the ongoing site environmental restoration program as well as two permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and are leased by USEC. These include decontamination of equipment and uranium recovery (X-705 Bldg.); chemical cleaning of equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); photo and printing lab (X-100); vehicle repair (X-750); coal pile

runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in U.S. DOE owned and permitted storage facilities. Waste generated by U.S. DOE and LATA/Parallax from the environmental restoration is also stored in these facilities. USEC also generates non mixed radioactive hazardous waste which is shipped out of Building XT-847. USEC ceased the enrichment process in May 2001.

Uranium contaminated hazardous wastes (mixed waste) which were/are generated by USEC and U.S. DOE are stored on-site in U.S. DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of treatment, storage and disposal (TSD) facilities in the United States which could accept mixed waste, and a May 1991 U.S. DOE moratorium on off-site waste shipment. A large percentage of the waste generated at Portsmouth is U.S. DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in U.S. DOE-owned storage areas. U.S. DOE sends some waste off-site (to U.S. DOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to U.S. DOE - Portsmouth for storage in the interim prior to their final disposal.

U.S. DOE/LATA Parallax generated hazardous wastes are primarily shipped to Energy Solutions, Clive, Utah, Perma-Fix, Gainesville, Florida, and Diversified Scientific Services, Inc. (DSSI), Kingston, Tennessee. In addition, a wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes. Uranium Disposition Services is working on a project to recover material from depleted uranium hexafluoride cylinders.

U.S. DOE has received $118 million dollars from the American Recovery and Reinvestment Act of 2009 for several projects including: decontamination and decommissioning (D&D) of the X-633 Recirculating Cooling Water Tower Complex; D&D of the X-760 Chemical Engineering Building; X-701B Groundwater Plume Removal; Repackaging and Disposition of Excess Uranium Materials; and D&D of the X-533 Switchyard Complex.

Opening Conference

On July 12, 2010, Walt Francis and Melody Stewart arrived at Building X-1000 at approximately 8:00 a.m. and informed the U.S. DOE and LATA/Parallax representatives of the nature, scope, and procedures for the RCRA inspection. The inspection was conducted by U.S. EPA and OEPA personnel as a Federal lead inspection. The facility representatives provided the team with a brief update of the facility since the last inspection, and a list of current hazardous waste satellite accumulation area (SAA) containers, hazardous waste less than 90 day accumulation areas, and universal waste accumulation areas. Ms. Rosemary Richmond allowed the inspectors access to the facility to conduct the inspection.

Site Tour

The walk-through began in Building X-720 where WEMS maintains a universal waste lamp accumulation area. The inspectors observed several containers of used fluorescent lamps. Inspector Francis observed that the cardboard boxes had universal waste labels with accumulation dates of "6/29/2010" and "6/16/2010". Mr. Robert Anderson told the inspectors that the used fluorescent bulbs are picked up by USA Recycling, Cincinnati, Ohio. The inspection continued to Building X-700, where Mr. Anderson showed the inspectors several SAA containers, several containers of used oil and an area for accumulation of universal waste. Inspector Francis observed three SAA containers: a container labeled "Rags/Paint Debris" (F005); a container labeled "Aerosol Cans" (D001); and a container labeled "Paint Shop" (D001/F005). The universal waste area included containers of used batteries and used fluorescent lamps. Inspector Francis observed that the boxes of used fluorescent lamps were labeled with a "6/9/2010" accumulation date. The inspection continued to Building X-326. Mr. Guilliams showed the inspectors an area at Column H-73 where U.S. DOE was storing five gaylord boxes of spent vapor phase hazardous waste (F001). Inspector Francis noted an accumulation date of "3/26/2010" on one of the containers. The inspection continued to the Building X-326 L-Cage permitted storage area. The inspectors toured the L-Cage area. The inspection continued in Building X-326 to DMSA #3 where the inspectors observed a 55-gallon SAA container of drip leg liquid (D008) and PCBs. The inspection continued in Building X-326 to DMSA #7 and DMSA #13 where the inspectors observed a 55-gallon container of drip leg liquid (D008) and PCBs in each area. The inspection continued to Building X-334 where U.S. DOE maintains a universal waste accumulation area. The inspectors observed one container of universal waste and a tank of waste anhydrous ammonia. The inspection continued to the Building X-770 pad less than 90 day hazardous waste accumulation area. The inspectors did not observe any waste containers in this area. The inspection continued to Building X-345. Mr. Guilliams showed the inspectors an area for accumulation of universal waste lamps, circuit boards, a 55-gallon container of mercury (D009) waste, and a container of "Pump Vent Oil" that was labeled "Pending Analysis 5/6/10". The inspection continued to Building X-623 where Mr. Greg Thompsen showed the inspectors where U.S. DOE maintains a less than 90 day hazardous waste accumulation area and an SAA container for waste TCE. Inspector Francis observed that the hazardous waste less-than-90 day area did not contain any containers of hazardous waste. The inspectors also reviewed the weekly inspection logs for Building X-623. The inspection continued to Building X-627 where Mr. Greg Thompsen showed the inspectors a 55-gallon SAA container. Inspector Francis observed a 55-gallon container that was labeled Waste "PPE/Carbon Bag Filters F001" and a 55-gallon container labeled "Waste TCE." The inspection continued to Building X-624 where U.S. DOE maintains a SAA container. The inspectors observed a 55-gallon container of PPE, filters and debris (F001). The inspection continued to Building X-622 where U.S. DOE maintains a 55-gallon SAA container of PPE/Bag Filters (F001). The walkthrough continued to Building X-749 area, where Mr. Guilliams showed the inspectors fourteen 55-gallon containers of soil cuttings labeled "Pending Analysis" and two poly tanks of well development water. The inspection continued to Building X-770 pad less than 90 day hazardous waste accumulation area. The inspectors observed approximately 85 sacks ranging

from 15,000 pounds to 20,175 pounds of removed soil from Building X-770, to be shipped to Clive, Utah via rail. Inspector Francis noted that the oldest bag had an accumulation date of 5/20/2010, and some hazardous waste labels were fading from the sunlight. The inspection continued to Building X-744S where the inspectors observed a 55-gallon container of used oil. The inspection continued to Building X-633 area. Mr. Guilliams introduced Mr. Dave Richards to the inspectors. The inspectors did not observe any universal waste in this area. The inspection continued to Building X-701B where U.S. DOE maintains two SAA areas and a less than 90 day accumulation area. Inspector Francis observed a 55-gallon SAA container labeled "Waste PPE and Filters." The inspection continued to a gravel area north of Switchyard Building X-533 where U.S. DOE maintains a less than 90 day hazardous waste accumulation area. Mr. Guilliams showed the inspectors a 55-gallon container of used aerosol cans with an accumulation date of 6/29/2010, a small container labeled "Pending Analysis" with an accumulation date of "4/19/2010", several cylinders of sulfur hexafluoride with accumulation dates of 6/17/2010, and a 55-gallon container labeled "Pending Analysis" with an accumlation date of 4/15/2010. Mr. Guilliams told the inspectors that the sulfur hexafluoride cylinders would be shipped off-site as a D003 reactive waste.

The inspection continued to Building X-326. The inspectors returned to inspect the RCRA Permitted storage areas number 3 and number 5. Mr. Guilliams told the inspectors that they could not enter the areas due to a "Limiting Condition of Operations" (LCO) radioactive posting by USEC and could not remove the LCO posting within the timeframe that was needed to complete the inspection.

The inspectors then returned to Building X-1000 to review records.

Records Review

A record review was conducted. The inspection team requested to review hazardous waste manifests, land disposal restriction forms, mixed-waste shipment documentation, universal waste and used oil shipping records, personnel training information, weekly inspection logs, waste profiles for hazardous waste in storage, and the latest version of the contingency plan. The inspectors reviewed hazardous waste manifests since the date of the last inspection, two years of personnel training records, waste profiles, and weekly inspection logs. The inspectors reviewed a Contingency Plan that was last updated on March 31, 2010.

Closing Conference

The inspectors conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. U.S. DOE and LATA/Parallax would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, and completed inspection checklists. Inspector Francis noted that during the inspection of Building X-533 less than 90 day area the inspectors observed a container with a date of "4/15/2010." Mr. Guilliams said that the container would be moved into the

Permitted Storage Area. Inspector Francis also mentioned that during the inspection of the concrete pad by Building X-752 that some of the labels on the sacks of remediation soil were faded.

Attachments
Inspection Checklists.

RCRA HAZARDOUS WASTE GENERATOR INSPECTION CHECKLIST

ompany: U.S. DOE Portsmouth Gaseous Diffusion Plant EPA ID#: OH7 890 008 983

Street: 3930 US Route 23 South City: Piketon

County: Pike State: Ohio Zip: 45661

Mailing Address: Same
(If different from above)

Telephone: _____ Fax #: _____

Owner/ Operator: _____
(If different from above)

Street: _____

City: _____ State: Ohio Zip: _____

Inspection Date(s): 7/12/2010 Time(s): 8:00 am

Inspection Announced? _____ Yes __x__ NO If so, how much advance notice given? _____

	Name	Affiliation	Telephone
Inspectors:	Walt Francis	U.S. EPA	312-353-4921
	Melody Stewart	Ohio EPA	740-380-5256
Facility Representative:	Rosemary Richmond	LPP	740-897-2967
	Kristi Wiehle	U.S. DOE	740-897-5020

Complete All Other Applicable Checklists

Generator Classification	Waste Management Activity
____ Conditionally Exempt SQG (CESQG)	__X__ Containers
____ Small Quantity Generator (SQG)	____ Tank(s)
__X__ Large Quantity Generator (LQG)	____ Land Disposal Requirements (LDR)
____ No Generation	__X__ Used Oil
	__X__ Universal Waste
	____ Other

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

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

NOTE TO THE INSPECTOR

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

ESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
QG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]		Yes ☒ No ☐ N/A ☐
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]		Yes ☒ No ☐ N/A ☐
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]		Yes ☒ No ☐ N/A ☐
4.	Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)]		Yes ☒ No ☐ N/A ☐
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]		Yes ☒ No ☐ N/A ☐
6.	Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]		Yes ☐ No ☒ N/A ☐
7.	Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]		Yes ☐ No ☒ N/A ☐
8.	Does the generator accumulate hazardous waste?		Yes ☒ No ☐ N/A ☐
NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.			
9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?		Yes ☐ No ☒ N/A ☐
NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).			
10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]		
	a.	Container that meets 3745-66-70 to 3745-66-77?	Yes ☐ No ☒ N/A ☐
	b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes ☐ No ☒ N/A ☐
	c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes ☐ No ☒ N/A ☐
	d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes ☐ No ☒ N/A ☐
NOTE: Complete appropriate checklist for each unit.			
NOTE: If waste is treated to meet LDRs, use LDR checklist.			
11.	Does the generator export hazardous waste? If so:		Yes ☐ No ☒ N/A ☐
	a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes ☐ No ☐ N/A ☐
	b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes ☐ No ☐ N/A ☐
	c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes ☐ No ☐ N/A ☐
	d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes ☐ No ☐ N/A ☐

	e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes ☐ No ☐ N/A ☒
MANIFEST REQUIREMENTS			
12.		Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes ☒ No ☐ N/A ☐
13.		Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes ☒ No ☐ N/A ☐
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]			
14.		Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes ☒ No ☐ N/A ☐
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].			
15.		If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes ☒ No ☐ N/A ☐
16.		Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes ☒ No ☐ N/A ☐
17.		If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	Yes ☐ No ☐ N/A ☒
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.			
18.		If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes ☒ No ☐ N/A ☐
19.		If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes ☒ No ☐ N/A ☐
20.		Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes ☒ No ☐ N/A ☐
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.			
PERSONNEL TRAINING			
21.		Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes ☒ No ☐ N/A ☐
22.		Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)]	Yes ☒ No ☐ N/A ☐
23.		Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes ☒ No ☐ N/A ☐
24.		Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes ☒ No ☐ N/A ☐
25.		Does the generator provide annual refresher training to employees? [3745-65-16(C)]	Yes ☒ No ☐ N/A ☐
26.		Does the generator keep records and documentation of:	
	a.	Job titles? [3745-65-16D(1)]	Yes ☒ No ☐ N/A ☐

	b.	Job descriptions? [3745-65-16D(2)]	Yes ☒ No ☐ N/A ☐
	c.	Type and amount of training given to each person? [3745-65-16D(3)]	Yes ☒ No ☐ N/A ☐
	d.	Completed training or job experience required? [3745-65-16D(4)]	Yes ☒ No ☐ N/A ☐
27.		Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	Yes ☒ No ☐ N/A ☐

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the -job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained
Waste Manager	MITCH NEWMAN	4/19/10
"	CHRIS GUILLIAMS	6/17/10
"	MARK CRABTREE	5/5/10

CONTINGENCY PLAN

28.		Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]	Yes ☒ No ☐ N/A ☐
29.		Does the plan describe the following:	
	a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes ☒ No ☐ N/A ☐
	b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes ☒ No ☐ N/A ☐
	c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes ☒ No ☐ N/A ☐
	d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes ☒ No ☐ N/A ☐
	e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes ☒ No ☐ N/A ☐

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]

30.		Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]	Yes ☒ No ☐ N/A ☐
31.		Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes ☒ No ☐ N/A ☐
32.		Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes ☒ No ☐ N/A ☐

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan: (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

EMERGENCY PROCEDURES

33.		Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes ☐ No ☐ N/A ☒
	a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes ☐ No ☐ N/A ☒
	b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes ☐ No ☐ N/A ☒

	c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)?	Yes ☐ No ☐ N/A ☒

NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

PREPAREDNESS AND PREVENTION			
34.		Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes ☒ No ☐ N/A ☐
35.		Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:	
	a.	Internal communications or alarm system? [3745-65-32(A)]	Yes ☒ No ☐ N/A ☐
	b.	Emergency communication device? [3745-65-32(B)]	Yes ☒ No ☐ N/A ☐
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes ☒ No ☐ N/A ☐
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes ☒ No ☐ N/A ☐
NOTE: Verify that the equipment is listed in the contingency plan.			
36.		Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes ☒ No ☐ N/A ☐
37.		Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes ☒ No ☐ N/A ☐
38.		Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes ☒ No ☐ N/A ☐
39.		If there is only one employee on the premises, is there immediate access to a device (eg., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes ☒ No ☐ N/A ☐
40.		Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes ☒ No ☐ N/A ☐
41.		Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes ☒ No ☐ N/A ☐
42.		Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes ☒ No ☐ N/A ☐
SATELLITE ACCUMULATION AREA REQUIREMENTS			
43.		Does the generator ensure that satellite accumulation area(s):	
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes ☒ No ☐ N/A ☐
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes ☒ No ☐ N/A ☐
	f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes ☒ No ☐ N/A ☐
44.		Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes ☐ No ☐ N/A ☒

	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes ☐ No ☐ N/A ☒
	b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes ☐ No ☐ N/A ☒
NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less then 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.			
USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS			
45.		Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes ☒ No ☐ N/A ☐
46.		Is the accumulation date on each container? [3745-52-34(A)(2)]	Yes ☒ No ☐ N/A ☐
47.		Are hazardous wastes stored in containers which are:	
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes ☒ No ☐ N/A ☐
	b.	In good condition? [3745-66-71]	Yes ☒ No ☐ N/A ☐
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes ☒ No ☐ N/A ☐
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes ☒ No ☐ N/A ☐
NOTE: Record location on process summary sheets, photograph the area, and record on facility map.			
48.		Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days.	Yes ☒ No ☐ N/A ☐
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes ☒ No ☐ N/A ☐
49.		Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes ☒ No ☐ N/A ☐
50.		Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes ☒ No ☐ N/A ☐
51.		If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes ☒ No ☐ N/A ☐
52.		If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes ☒ No ☐ N/A ☐
NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.			
53.		If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745- 66-11? [3745-52-34(A)(1)]	Yes ☐ No ☐ N/A ☒
NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]			
PRE-TRANSPORT REQUIREMENTS			
54.		Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes ☒ No ☐ N/A ☐
55.		Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes ☒ No ☐ N/A ☐

56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes ☑ No ☐ N/A ☐

STATE PART B HAZARDOUS WASTE PERMIT INSPECTION CHECKLIST

DIVISION OF HAZARDOUS WASTE MANAGEMENT
OHIO EPA
July 2002

Table of Contents
Portsmouth Gaseous Diffusion Plant
04-66-0680

RCRA Inspection Checklist

General Conditions of Permit 2
General Permit Compliance and Activities 2

Permit Modification, Revision, Revocation 5

Site Entry - Availability of Records 7

Recordkeeping Requirements 7
Confidentiality 7
Operating Record 7
Annual Report Requirement 9
Sampling/monitoring Recordkeeping Requirements 9
Waste Minimization Requirements 10

Off-site Shipments/manifest Requirements 11
Manifest Requirements/wastes Received On-site 11

Waste Analysis/waste Analysis Plan 11
General Requirements 12
Waste Analysis Quality Assurance Requirements 12

General Inspection Requirements 14

Security Provisions/facility Operation 15

Personnel Training 16

Required Equipment 16

Contingency Plan Requirements 17
Emergency Procedures 17
Emergency Authorities 18
Emergency Coordinator 18
Amendment of Plan 18
Implementation of Plan 19

Contingency Plan Requirements 20
Closure Plan/amendment 20
Closure Activities 20

Requirements for Ignitable, Reactive or Incompatible Wastes 22

Storage of Hazardous Wastes in Containers 24
Condition of Containers 25
Inspections 25
Containment System 26
Required Aisle Space 27
Closure and Post-closure 27
Container Storage of Residual Waste 27

Land Disposal Restriction Requirements 28
Prohibition Against Dilution 28
Generator Requirements 28
Notification/certification 29
Storage of Land Disposal Restricted Wastes 31

OHIO PART B PERMITTED FACILITY
RCRA INSPECTION CHECKLIST

ility: Portsmouth Gaseous Diffusion Plant Ohio Permit #: 04-66-0680

Co-operator: LATA/Parallax Portsmouth, LLC

Address: 3930 U.S. Route 23 South
Piketon, OH 45661

USEPA ID#: OH7890008983
Facility Phone: 740-897-5010

County: Pike

Time: 8:00 a.m. - 5:00 p.m.

Inspection Date: 7/12/2010

Advance notice of inspection given?___(Yes) __X_(No)
If so, how far in advance? _____

	Name	***Agency/Title***	***Phone***
Inspector(s):	Walt Francis	U.S. EPA	312-353-4921
	Melody Stewart	Ohio EPA	740-380-5256
Facility Representative(s):	Rosemary Richmond	LPP	740-897-2967
	Kristi Wiehle	U.S. DOE	740-897-5020

Is facility operating as a generator? Yes __X_____ No _____

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

PERMIT STATUS

Permit Issued:	March 15, 2001
Permit Effective Date:	March 15, 2001
Permit Expiration Date:	March 15, 2011

STORAGE		**TREATMENT**		**DISPOSAL**	
X	Container		Tank		Injection Well
	Tank		Surface Impoundment		Landfill
	Waste Pile		Incinerator		Land Application
	Surface Impoundment		Thermal Treatment		Surface Impoundment

PROCESS DESCRIPTION

Historically, the main function of the DOE-PORTS facility was to enrich uranium for military use (nuclear submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in UF6 feedstock which contains 0.711% U235. However, in 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). USDOE retained ownership of the ongoing site environmental restoration program as well as two permitted hazardous waste storage facilities.

Numerous other activities associated with the plant=s main function also occur on-site and are leased by USEC. These include decontamination of equipment and uranium recovery (X-705 Bldg.); chemical cleaning of equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); photo and printing lab (X-100); vehicle repair (X-750); coal pile runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in DOE owned and permitted storage facilities. Waste generated by DOE from the environmental restoration is also stored in these facilities. USEC ceased the enrichment process in May 2001.

WASTE MANAGEMENT, GENERATION AND AMOUNT

Uranium contaminated hazardous wastes (mixed waste) which were/are generated by USEC and DOE are stored on-site in DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of TSDs in the U.S. which could accept mixed waste, and a May 1991 DOE moratorium on off-site waste shipment. A large percentage of the waste generated at PORTS is DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in DOE-owned storage areas. During the past year, numerous shipments of hazardous waste were manifested off-site by both DOE and USEC. This is due to an increase in treatment capacity at off-site commercial treatment facilities and DOE treatment facilities, the lifting of the moratorium, and the execution of the site treatment plans for DOE and USEC. DOE sends some waste off-site (to USDOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to DOE for storage in the interim prior to their final disposal.

Hazardous

The DOE Part B permit lists numerous hazardous waste codes for wastes that are generated by the above processes and the environmental restoration. These are stored in drums ranging in size from 30 to 110 gallon capacity, 5 gallon containers, 20 gallon lab packs, 5' cans, 4'x4'x6' boxes, 4'x4'x8' boxes, polybottles and laboratory bottles.

Nonhazardous

A wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes.

HAZARDOUS WASTE MANAGEMENT UNITS

The following DOE-owned permitted storage facilities were inspected during the CEI:

-X-326 Container Storage Facility

In addition, DOE-owned and operated HWMUs and SAAs were inspected in the following buildings:

-X-326	-X-622	-X-701B
-X-627	-X-624	-X-334
-X-623	-X-627	-X-720
-X-333	-X-330	
-X-770	-X-746	
-X-345	-X-700	

REGULATORY/ENFORCEMENT HISTORY

As a result of violations of state and federal hazardous waste regulations found during the 1987, 1988, and 1989 OEPA RCRA inspections, USDOE and OEPA entered into a Consent Decree governing restoration of the environment at DOE-PORTS. This decree includes a requirement that DOE close the X-701B, X-749, X-231B, and X-616 units within specific timeframes. The X-749, X-616 and X-231B units have now been closed. X-701B is yet to be closed.

On October 4, 1995, DFFOs were signed which allowed DOE to store LDR wastes in excess of one year, so long as waste is being stored in compliance with the orders and an approved site treatment plan. These orders supercede the May 18, 1993, DFFOs.

On February 24, 1998, DOE, LMES and Ohio signed DFFOs and a Consent Order regarding past violations and the management of DUF6 and LiOH. This order was amended on March 12, 2004 and June 23, 2005. The latest amendment added LLP and UDS to the order.

On March 18, 1999, DOE and Ohio EPA signed DFFOs. These DFFOs provide exemptions to DOE and integrate the following unclosed units into the CMS/CMI process: X-749, X-231B, X-701C, X701B, X-230J7, and X-744Y.

A Part B permit was issued to DOE and its current co-operator, Bechtel Jacobs, for the X-7725 and X-326 storage facilities on March 15, 2001.

GENERAL CONDITIONS OF PERMIT

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1. Has the expiration date of the permit passed? If so: Yes__No X 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 _X_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? (Or upon a later date if the permittee can demonstrate good cause for late submittal.) [Condition A.6.(a)] Yes__No__ N/A _X_RMK#___

NOTE: *The permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:*

   A. The permittee has submitted a timely and complete application for a renewal permit under OAC rule 3745-50-40; and

   B. Through no fault of the permittee, a new permit has not been issued pursuant to OAC rule 3745-50-40 on or before the expiration date of the permit. [Condition A.6.(b)]

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.26] Yes X 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? [Condition A.1.(b) and A.5] Yes__No X N/A ___RMK#___

4. Have any provisions of the permit been identified as invalid? [Condition A.4.] Yes__No X N/A ___RMK#___

5. Has the facility identified any instances of noncompliance with the permit, RC Chapter 3734. or the rules adopted thereunder, which may endanger human health or the environment? If so: Yes__No X N/A ___RMK#___

a. Did the facility immediately report orally the following to Ohio EPA's Emergency Response Section within 24 hours of becoming aware of the circumstance(s): [Condition A.20.(a)]

i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and — Yes__No__ N/A _X_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 or operator? — Yes__No__ N/A _X_RMK#__

B. Name, address and telephone number of the facility? — Yes__No__ N/A _X_RMK#__

C. Name and quantity of material(s) involved? — Yes__No__ N/A _X_RMK#__

D. The extent of injuries, if any? — Yes__No__ N/A _X_RMK#__

E. An assessment of the actual or potential hazard to the environment and human health outside the facility where this is applicable? — Yes__No__ N/A _X_RMK#__

F. Estimated quantity and disposition of recovered material that resulted from the incident? — Yes__No__ N/A _X_RMK#__

6. Did the permittee provide a written report to Ohio EPA's Emergency Response Section and DHWM, SEDO within five days of the time the permittee became aware of the circumstances reported in Question 5? [Condition A.21.] If so did the report contain: — Yes__No__ N/A _X_RMK#__

a. A description of the noncompliance and its cause (including exact dates and times)? — Yes__No__ N/A _X_RMK#__

b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? — Yes__No__ N/A _X_RMK#__

c. Steps taken or planned to minimize the impact on human health and the environment and to reduce and prevent recurrence of the noncompliance?

Yes__No__ N/A _X_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 becomes aware of the circumstances. [Condition A.21.(c)]*

7. Has the permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8] Yes__No__ N/A _X_RMK#__

8. Has the permittee identified any other instances of noncompliance not provided for in Question 5? Yes__No__ N/A _X_RMK#__

   a. If so, did the permittee report to the director within a month of the time at which the permittee is aware of such noncompliance? [Condition A.22.] Yes__No__ N/A _X_RMK#__

   b. Do the reports provided contain the information set forth in Condition A.20? Yes__No__ N/A _X_RMK#__

9. Has the permittee planned any physical alterations or additions to the permitted facility? Yes__No_X_ N/A ___RMK#__

   a. If so, has the facility provided Ohio EPA with notice of such changes? [Condition A.15] Yes__No__ N/A _X_RMK#__

Note: *Such notification does not waive the permittee's duty to comply with the permit pursuant to Condition A.5.*

REMARKS

RMIT MODIFICATION, REVISION, REVOCATION

1. Has the permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.] — Yes X No ___ N/A ___ RMK#___

2. Has the permit been transferred to a new owner or operator? [Condition A.18.] If so, — Yes ___ No X N/A ___ RMK#___

   a. Has the transfer been conducted in accordance with R.C. Chapter 3734. and the rules adopted thereunder? [Condition A.18.]; and — Yes ___ No ___ N/A X RMK#___

   b. Before transferring ownership did the permittee notify the new owner in writing of the requirements of R.C. Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.18.] — Yes ___ No ___ N/A X RMK#___

3. Has the permittee submitted reports of compliance or noncompliance with, or any progress reports on the requirements contained 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 X RMK#___

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

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

6. 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 HWFB? If so, — Yes ___ No X N/A ___ RMK#___

a. Has the permittee promptly submitted such facts or corrected information to the appropriate entity? [Condition A.24.] Yes__No__ N/A _X_RMK#__

7. Is the permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications to the application? [Condition A.14.(c)] Yes_X_No__ N/A ___RMK#__

8. Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14.(c)] Yes_X_No__ N/A ___RMK#__

REMARKS

E ENTRY - AVAILABILITY OF RECORDS

1. As specified in Condition A.11., has the permittee allowed the director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection, 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 X No__ N/A ___RMK#__

   b. Have access to and copy any records required to be kept under the conditions of the permit? — Yes X No__ N/A ___RMK#__

   c. Inspect at reasonable times facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit? — Yes X No__ N/A ___RMK#__

   d. Sample, document, or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by R.C. Chapter 3734. and the rules adopted thereunder? — Yes X No__ N/A ___RMK#__

RECORDKEEPING REQUIREMENTS

CONFIDENTIALITY

1. Has the permittee requested confidentiality of any information of the permit in accordance with R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.25.] — Yes__No X N/A ___RMK#__

OPERATING RECORD

2. Is the permittee maintaining a written operating record at the facility as set forth in OAC rule 3745-54-73 and Condition B.22. of the permit which contains the following elements:

a. A description and the quantity of each hazardous waste received? Yes X No__ N/A ___RMK#__

b. Method(s) and date(s) of treatment, storage or disposal at the facility? Yes X No__ N/A ___RMK#__

c. The location of each hazardous waste within the facility and the quantity at each location? Yes X No__ N/A ___RMK#__

3. Is the permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents as part of its operating record: [Condition A.28.]

a. Waste analysis plan in accordance with OAC rule 3745-54-13 and the conditions of the permit? Yes X No__ N/A ___RMK#__

b. Contingency plan in accordance with OAC rule 3745-54-53 and the conditions of the permit? Yes X No__ N/A ___RMK#__

c. Closure plan in accordance with OAC rule 3745-55-12 and the conditions of the permit? Yes X No__ N/A ___RMK#__

d. Personnel training plan and records required by OAC rule 3745-54-16 and the conditions of the permit? Yes X No__ N/A ___RMK#__

e. Inspection schedules developed in accordance with OAC rules 3745-54-15 and 3745-55-74 and the conditions of the permit? Yes X No__ N/A ___RMK#__

4. Have any of the documents identified in Question #3 been revised as required by the permit? If so, Yes X No__ N/A ___RMK#__

a. Has the permittee submitted the revisions to Ohio EPA? [Condition A.28.(b)] Yes X No__ N/A ___RMK#__

b. Has the permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.28.(b)] Yes X No__ N/A ___RMK#__

5. Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from the date of inspection? [Condition A.28.(c)] Yes X No__ N/A ___RMK#__

NUAL REPORT REQUIREMENT

.	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 and the conditions of the permit? [Condition B.25.]	Yes X No__ N/A ___RMK#__

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

7.	In compliance with Condition A.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 X No__ N/A ___RMK#__
	b. Individual(s) who performed the sampling or measurement?	Yes X No__ N/A ___RMK#__
	c. Date(s) analyses were performed?	Yes X No__ N/A ___RMK#__
	d. Individual(s) who performed the analyses?	Yes X No__ N/A ___RMK#__
	e. Analytical technique(s) or method(s) used?	Yes X No__ N/A ___RMK#__
	f. Results of such analyses?	Yes X No__ N/A ___RMK#__
8.	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 A.12.(a)]	Yes X No__ N/A ___RMK#__
9.	Has Ohio EPA requested submittal of any reports or other information required by the conditions of the permit from the permittee? If so,	Yes__No X N/A ___RMK#__
	a. Have the submittals been signed and certified according to OAC rules 3745-50-58(K) and 3745-50-42? [Condition A.13.]	Yes__No__ N/A _X_RMK#__

WASTE MINIMIZATION REQUIREMENTS

10. Has the permittee submitted a Waste Minimization Report to Ohio EPA meeting the requirements of Condition A.29. of the permit within 180 days of permit journalization? Yes X No__ N/A ___RMK#__

    a. Following the first submittal as identified above in Question #10, has the permittee submitted biennial updates to this report as required by Condition A.29.(c)? Yes X No__ N/A ___RMK#__

REMARKS

F-SITE SHIPMENTS/MANIFEST REQUIREMENTS

Is all hazardous and mixed waste transported from the facility by a properly registered transporter of hazardous and mixed waste in accordance with all applicable laws, rules and standards? [Condition A.16.] — Yes X No__ N/A __RMK#__

MANIFEST REQUIREMENTS/WASTES RECEIVED ON-SITE

2. Upon receipt of the manifests, has the permittee signed and dated each copy of the manifest? [OAC 3745-54-71(A)(1); Condition B.24.] — Yes X No__ N/A __RMK#__

3. For any significant discrepancies identified upon receipt of the manifest(s): did the permittee note such discrepancies on the manifest(s) in accordance with OAC rule 3745-54-71(A)(2) and Condition B.24? — Yes__No__ N/A X RMK#__

   a. Did the permittee attempt to reconcile the discrepancy? [Condition B.24.] — Yes__No__ N/A X RMK#__

   b. If the discrepancy was not resolved within 15 days: did the permittee submit a report, including a copy of the manifest, to the director in accordance with OAC rule 3745-54-72(B)? [Condition B.24.] — Yes__No__ N/A X RMK#__

4. Does the permittee immediately give the transporter at least one copy of the signed manifest? [OAC 3745-54-71(A)(3); Condition B.24.] — Yes X No__ N/A __RMK#__

5. Does the permittee provide the generator with a copy of the manifest within 30 days of receipt of waste on-site? [OAC 3745-54-71(A)(4); Condition B.24.] — Yes X No__ N/A __RMK#__

6. Does the permittee retain a copy of each manifest on-site for at least three years from the date of delivery? [OAC 3745-54-71(A)(5); Condition B.24.] — Yes X No__ N/A __RMK#__

7. Has the permittee received any hazardous waste or mixed waste from off-site, other than as described in Condition B.2(b)? — Yes__No X N/A __RMK#__

WASTE ANALYSIS/WASTE ANALYSIS PLAN

GENERAL REQUIREMENTS

1. Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information which is necessary to properly treat, store or dispose of the waste in accordance with OAC Chapters 3745-54 to 3745-57 and Condition B.3 of the permit (Section C of the approved permit application)? [OAC 3745-54-13(A)(1)] — Yes X No__ N/A ___RMK#__

2. Since the last inspection, were any wastes generated by the facility which were unable to be characterized through process knowledge? If so, — Yes X No_ N/A ___RMK#__

   a. Were the waste analysis procedures described in Section C of the approved permit application followed? — Yes X No__ N/A __RMK#__

3. Is the permittee following the procedures described in the approved waste analysis plan (Section C of approved permit application) and the requirements of OAC rule 3745-54-13? [Condition B.3.] — Yes X No__ N/A ___RMK#__

4. Is the permittee maintaining waste analysis data in the facility's operating record as required by OAC rule 3745-54-73 and Condition B.22. of the permit? — Yes X No__ N/A ___RMK#__

WASTE ANALYSIS QUALITY ASSURANCE REQUIREMENTS

5. Is the permittee verifying the analysis of each waste stream annually as part of its quality assurance program in accordance with SW-846? [Condition B.3.] — Yes X No__ N/A ___RMK#_

6. In accordance with Condition B.3. of the permit, does the permittee's quality assurance plan ensure that the permittee is, at a minimum:

   a. Maintaining property functional instruments? — Yes X No__ N/A ___RMK#__

   b. Using approved sampling/analytical methods? — Yes X No__ N/A ___RMK#__

c. Verifying the validity of sampling and analytical procedures and performance of correct calculations? Yes X No___ N/A ___RMK#___

7. If the permittee uses a contract laboratory to perform analyses, did the permittee inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this permit? USEC + OTHER (MB) Yes X No___ N/A ___RMK#___

REMARKS

GENERAL INSPECTION REQUIREMENTS

1. Is the permittee following the inspection procedures and schedules described in Section F of the approved permit application and the requirements of OAC rule 3745-54-15? [Condition B.5.] Yes X No__ N/A ___RMK#__

2. Does the permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [OAC 3745-54-15(A)(1)(2)] Yes X No__ N/A ___RMK#__

3. 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? Yes X No__ N/A ___RMK#__

   a. Is the schedule kept at the facility? [OAC 3745-54-15(B)(2)] Yes X No__ N/A ___RMK#__

   b. Does the schedule identify the types of problems which are to be looked for during the inspection? [OAC 3745-54-15(B)(3)] Yes X No__ N/A ___RMK#__

   c. Does the schedule include inspection of areas subject to spills daily when in use and according to other applicable regulations when not in use? [OAC 3745-54-15(B)(4)] Yes X No__ N/A ___RMK#__

4. 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 X No__ N/A ___RMK#__

5. Is the permittee maintaining records of inspections for a minimum of three years? [Condition B.5.] Yes X No__ N/A ___RMK#__

6. 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 X No__ N/A ___RMK#__

b. Signature of inspector? Yes X No__ N/A ___RMK#__

c. Notation of observations made? Yes X No__ N/A ___RMK#__

d. Date/nature of any repairs or other remedial actions? Yes X No__ N/A ___RMK#__

SECURITY PROVISIONS/FACILITY OPERATION

1. Is the permittee complying with the security provisions of OAC rule 3745-54-14(B)(1) and B(2) and (C) and Section F of the approved permit application, including the following: [Condition B.4.]

   a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility; Yes X No__ N/A ___RMK#__

   b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility; or Yes X 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 X No__ N/A ___RMK#__

2. In accordance with OAC rule 3445-54-14(C), does the permittee have signs reading ADanger-Unauthorized Personnel Keep Out@ posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? [Condition B.4.] Yes X No__ N/A ___RMK#__

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 waters? [Condition B.1.] Yes X No__ N/A ___RMK#__

PERSONNEL TRAINING

1. Is the facility conducting personnel training in accordance with Section H of the approved permit application and the following requirements of OAC rule 3745-54-16: [Condition B.6.]

   a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC 3745-54-16(A)(B)(C)] — Yes X 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 3745-54-16(B)? — Yes X No__ N/A ___RMK#__

   c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(B)? — Yes X 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 X No__ N/A ___RMK#__

REQUIRED EQUIPMENT

1. Is the permittee, at a minimum, maintaining the equipment set forth in the approved permit application (Section G) at the facility? [Condition B.9.] — Yes X No__ N/A ___RMK#__

2. Is the permittee inspecting, testing, and maintaining the equipment specified in Question #1 to assure its proper operation as specified in OAC rule 3745-54-33, the inspection plans and Section G of the approved permit application? [Condition B.10.] — Yes X 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 Section G of the approved permit application? [Condition B.11.] — Yes X No__ N/A ___RMK#__

NTINGENCY PLAN REQUIREMENTS

EMERGENCY PROCEDURES

1. In compliance with Condition B.13.(a) of the permit, does the permittee:

   a. Familiarize the emergency response agencies likely to respond to an emergency at the facility with:

      i. The location and layout of the facility? Yes X No__ N/A ___RMK#__

      ii. Properties of hazardous waste and mixed waste managed at the facility and associated hazards? Yes X No__ N/A ___RMK#__

      iii. Places where facility personnel will normally be working? Yes X No__ N/A ___RMK#__

      iv. Entrances to and roads inside the facility? Yes X No__ N/A ___RMK#__

      v. Evacuation routes as depicted in Section G of the permit application? Yes X No__ N/A ___RMK#__

   b. Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the facility, and any further requirements imposed by the permit?; and Yes X No__ N/A ___RMK#__

   c. Familiarize local police and fire departments, local hospitals and other local emergency services with the properties of hazardous waste and mixed waste managed at the facility and the types of injuries which could result from fires, explosions or a release of hazardous wastes at the facility? Yes X No__ N/A ___RMK#__

2. Is the permittee in compliance with the requirements of OAC rule 3745-54-56 and Section G of the approved permit application regarding emergency procedures? [Condition B.20.] Yes X No__ N/A ___RMK#__

EMERGENCY AUTHORITIES

3. 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_X_ 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 _X_RMK#__

4. 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.] — Yes_X_No__ N/A ___RMK#__

5. Has the permittee notified the agencies in Question #4, in writing, within ten days of the effective date of any amendments or revisions to the Plan? [Condition B.18.(b)] — Yes_X_No__ N/A ___RMK#__

6. 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 in accordance with OAC rule 3745-54-53? [Condition B.18.(c)] — Yes_X_No__ N/A ___RMK#__

EMERGENCY COORDINATOR

7. Is the permittee in compliance with the requirements of OAC rule 3745-54-55 with regard to the emergency coordinator? [Condition B.19.] — Yes_X_No__ N/A ___RMK#__

Darryl Anderson

AMENDMENT OF PLAN

8. Is the permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17.] — Yes_X_No__ N/A ___RMK#__

Note: *Also see Question #4 of RECORDKEEPING REQUIREMENTS to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.*

LEMENTATION OF PLAN

9. Has there been a fire, explosion or release of hazardous waste or mixed waste or constituents at the facility since the last date of inspection as described by Condition B.14. of the permit? If so, — Yes__No_X_ 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? [Condition B.14.] — Yes__No__ N/A _X_RMK#__

   b. Did the permittee collect and manage released material, emergency response material and by-products as hazardous waste or mixed waste until making a demonstration to Ohio EPA that such materials are not subject to Ohio hazardous waste rules? [Condition B.16.] — Yes__No__ N/A _X_RMK#__

   c. 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 _X_RMK#__

      i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23.] ***Note:*** *See also Conditions A.21. and A.22. of the permit for additional reporting/recordkeeping requirements.* — Yes__No__ N/A _X_RMK#__

   d. 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? [Condition B.23.] — Yes__No__ N/A _X_RMK#__

REMARKS

CONTINGENCY PLAN REQUIREMENTS

CLOSURE PLAN/AMENDMENT

1. Is the permittee maintaining at the facility, the approved closure plan which contains the elements set forth in OAC rule 3745-55-12? [Condition B.29.] — Yes X No__ N/A ___RMK#__

2. Has the permittee amended the closure plan? If so, — Yes__No X N/A ___RMK#__

   a. Has the plan been amended in accordance with OAC rule 3745-55-12(C)? [Condition B.28.] — Yes__No__ N/A _X_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.*

CLOSURE ACTIVITIES

3. Has the permittee closed the facility? If so, — Yes__No X N/A ___RMK#__

   a. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26.] — Yes__No__ N/A _X_RMK#__

   b. Did the permittee carry-out the approved closure plan as set forth in the permit application and terms and conditions of the permit? [Condition B.26.] — Yes__No__ N/A _X_RMK#__

   c. After receiving the final volume of hazardous waste, did the permittee remove from the facility all hazardous waste and mixed 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 _X_RMK#__

   d. 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 _X_RMK#__

e. Did the permittee notify Ohio EPA's Southeast District Office within five working days prior to all rinseate and soil sampling? [Condition B.32.(b)] Yes__No__ N/A _X_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 _X_RMK#__

REMARKS

REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

1. Is the permittee following the procedures as specified in OAC rules 3745-54-17, 3745-55-77 and Section F of the approved application when managing ignitable, reactive and/or incompatible wastes? [Conditions B.7.(a) and C.10. and C.11.] — Yes X No ___ N/A ___ RMK#___

2. Does the permittee ***not*** store incompatible waste ***except*** in accordance with OAC rules 3745-54-17(B) and 3745-55-77, and the terms and conditions of this permit? [Condition C.11.(a)] — Yes X No ___ N/A ___ RMK#___

3. Does the permittee take precautions to prevent placing hazardous waste or mixed waste in an unwashed container that previously held an incompatible waste or material? [Condition C.11.(b)] — Yes X No ___ N/A ___ RMK#___

4. Does the permittee ensure that all containers of incompatible wastes are physically separated from other incompatible wastes or materials by a wall, berm, dike, or other device in accordance with OAC rule 3745-55-77 and the Appendix to OAC rule 3745-55-99? [Condition C.11.(c)] — Yes X No ___ N/A ___ RMK#___

   a. Are all containers of aqueous hazardous acids (ph $\leq$ 2) and caustics ph $\geq$ 12.5) sorted on different pallets and physically separated in different rooms? [Condition C.11.(c)] — Yes X No ___ N/A ___ RMK#___

   b. Are aqueous acids and caustics in poly bottles, and other containers requiring nuclear criticality safety spacing physically separated in the same room by a dike? [Condition C.11.(c)] — Yes X No ___ N/A ___ RMK#___

   c. Are containers of cyanides and sodium metals being stored in rooms physically separate from other incompatible wastes or other incompatible materials? [Condition C.11.(c)] — Yes X No ___ N/A ___ RMK#___

	Does the permittee provide electrical grounding for all containers, tanks and transport vehicles during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(b)]	Yes X No__ N/A ___RMK#___
6.	Does the permittee provide and require the use of spark proof tools during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(c)]	Yes X No__ N/A ___RMK#___
7.	Does the permittee prohibit smoking and open flames in areas where hazardous wastes are managed and post appropriate signs? [Condition B.7.(d)]	Yes X No__ N/A ___RMK#___
8.	As required by OAC rule 3745-55-76, does the permittee store containers of ignitable or reactive wastes greater than 15 meters (50 feet) away from the Portsmouth Gaseous Diffusion Plant reservation boundary? [Condition C.10.(a)]	Yes X No__ N/A ___RMK#___

REMARKS

STORAGE OF HAZARDOUS WASTES IN CONTAINERS

NOTE: *The requirements of permit 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.*

1. Is the permittee storing in containers, only those wastes as specified in Section A of the Part B permit application? [Condition C.1.(a), C.2.] Yes X No__ N/A ___RMK#__

2. Does the permittee limit the total quantity of containerized waste in the container storage area to 133,000 gallons at any given time in the permitted container areas, located in building X-326? [Condition C.1.(a)] Yes X No__ N/A ___RMK#__

NOTE: *For the purposes of compliance with the capacity limitation of the permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity. For example, a 55-gallon drum will be considered to be holding 55 gallons of waste, regardless of the actual quantity stored in the drum. [Condition C.1.(b)]*

3. When accumulating waste within the permitted X-326 container storage area, does the permittee ensure that the total amount of waste (both > 90 days and < 90 days) does not exceed the maximum container storage inventory established under Condition C.1.? [Condition C.1.(c)] Yes X No__ N/A ___RMK#__

4. Are hazardous wastes subject to regulation by the permit stored only at the designated container storage area described in the approved permit application? (See Section D of the permit application) [Condition C.1.(a)] Yes X No__ N/A ___RMK#__

5. Is each container stored clearly marked to identify its contents and the date each period of accumulation/storage begins? (See Section D of the permit application) [Condition C.3.] Yes X No__ N/A ___RMK#__

6. Does the permittee store hazardous waste in the types of containers described in Section D of the approved permit application? [Condition C.1.(a)] Yes X No__ N/A ___RMK#__

NDITION OF CONTAINERS

8. Are containers holding hazardous wastes in good condition? [Condition C.3.] Yes X No__ N/A __RMK#__

   a. If not, (e.g., severe rusting, structural defects) did the permittee transfer the hazardous waste from such a container to a container that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit and OAC rule 3745-55-71? [Condition C.3.] Yes__No__ N/A X RMK#__

9. 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 C.4.] Yes X No__ N/A __RMK#__

10. Is storage conducted in the container storage containment system as described in Condition C.1. of the permit and Section D of the approved permit application? [Condition C.5.(a)] Yes X No__ N/A __RMK#__

11. 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 C.5.(b)] Yes X No__ N/A __RMK#__

12. Are lab-pack wastes handled in compliance with applicable storage requirements? [Condition C.5.(c)] Yes X No__ N/A __RMK#__

13. Are lab-pack wastes packaged in drums containing absorbent material that is compatible with the wastes? [Condition C.5.(d)] Yes X No__ N/A __RMK#__

INSPECTIONS

14. Is the permittee inspecting the container area weekly in accordance with OAC rules 3745-54-15, and 3745-54-73 and the approved inspection schedule (Section F) to detect leaking containers and deterioration of containers and the containment system? [Condition C.8.] Yes X No__ N/A __RMK#__

a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken? [Condition C.8.] — Yes X No__ N/A ___RMK#__

b. On days when containerized waste are added or removed to and/or from any of the permitted areas for storage, does the permittee conduct inspections as described in Section F of the approved Part B permit application and maintain the inspection results in the facility operating record? [Condition C.8.] — Yes X No__ N/A ___RMK#__

CONTAINMENT SYSTEM

15. Does the permittee maintain the containment system as described in Section D of the approved Part B permit application, including: [Condition C.6.] — Yes X No__ N/A ___RMK#__

a. Sufficient design to contain 10% of the total volume of the containers or the volume of the largest container, whichever is greater? [Condition C.6.(b)] — Yes X No__ N/A ___RMK#__

b. A system which is free of gaps and sufficiently impervious to contain leaks and spills? — Yes X No__ N/A ___RMK#__

c. Equipped with a coating which is compatible with each waste stored in the area? — Yes X No__ N/A ___RMK#__

d. *For those wastes which are deemed incompatible with liner material:* Has the permittee installed a separate secondary containment structure within the existing structure which is equipped with a compatible liner? — Yes__No__ N/A X RMK#__

16. Has the permittee had a spill or leak of wastes or an accumulation of precipitation in the containment system? If so, — Yes__No X N/A ___RMK#__

a. Are spilled or leaked wastes and accumulated precipitation removed from the sump or collection area in a timely manner? [Condition C.6.(c)] — Yes__No__ N/A X RMK#__

b. Does removal of spilled/leaked wastes and accumulated precipitation occur within 24 hours from the time the spill or leak waste is discovered? [Condition C.6.(c)] — Yes__No__ N/A X RMK#__

REQUIRED AISLE SPACE

17. Is the permittee maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in the event of an emergency to any area of the facility as required by OAC rule 3745-54-35? [Condition B.12.] Yes X No__ N/A ___RMK#___

CLOSURE AND POST-CLOSURE

18. At closure of the container storage area, did the permittee remove all hazardous waste, hazardous waste residues, mixed waste and mixed waste residues from the containment system, in accordance with the procedures set forth in the approved closure plan (Section I of the permit application)? [Condition C.13.(a)] Yes__No__ N/A _X_RMK#__

19. During closure, if the permittee could not demonstrate that all contaminated soils could be removed, did the permittee close the unit and perform post-closure care following a plan approved by Ohio EPA? [Condition C.13.(b)] Yes__No__ N/A _X_RMK#__

CONTAINER STORAGE OF RESIDUAL WASTE

20. Is the permittee complying with the provisions of Section C-2E of the application as amended pursuant to Condition B.2.(b) of this permit? Yes X No__ N/A ___RMK#_

LAND DISPOSAL RESTRICTION REQUIREMENTS

PROHIBITION AGAINST DILUTION

1. Has the permittee updated the annual Federal Facility Compliance Act Schedule? [OAC rule 3745-270-50; Condition B.36.] — Yes X No__ N/A ___RMK#__

2. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [OAC rule 3745-270-40 through 49; Condition B.36.(c)] — Yes__No X N/A ___RMK#__

   a. As a substitute for adequate treatment to achieve compliance with LDR treatment standards? — Yes__No__ N/A X RMK#__

   b. To circumvent the effective date of a prohibition (e.g., to dilute a Anon-wastewater@ waste to a Awastewater@ to avoid complying with the Anon-wastewater@ treatment standard)? — Yes__No__ N/A X RMK#__

   c. To otherwise avoid a prohibition in OAC rule 3745-270-30 through -39? — Yes__No__ N/A X RMK#__

   d. To otherwise avoid a prohibition imposed by Section 3004(d) of RCRA? — Yes__No__ N/A X RMK#__

NOTE: *If the answer to any of Questions 2(a) through 2(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of OAC rule 3745-270-03 [Condition B.36.]. Dilution of wastes is permissible under some conditions. See OAC rule 3745-270-03(B).*

GENERATOR REQUIREMENTS

3. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No_ N/A ___RMK#_

   a. ***For determinations based solely on knowledge of the waste:*** Is supporting data used to make this determination being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No__ N/A ___RMK#__

b. ***For determinations based upon analytical testing:*** Is a copy of waste analysis data being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] Yes X No__ N/A ___RMK#__

4. Has the generator determined the correct Atreatability group@ for each waste restricted from land disposal (e.g., wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [OAC rule 3745-270-07; Condition B.36.(e)] Yes X No__ N/A ___RMK#__

5. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [OAC rule 3745-270-07(A); Condition B.36.(e)] Yes X No__ N/A ___RMK#__

6. Does the entity generate any listed waste(s) which are restricted from land disposal? If so, Yes X No__ N/A ___RMK#__

a. Do such wastes also exhibit hazardous waste characteristics as identified in OAC rules 3745-51-20 to 3745-51-24? Yes X No__ N/A ___RMK#__

b. ***For listed wastes which also exhibit a characteristic:*** Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [OAC rule 3745-270-09(A)] Yes X No__ N/A ___RMK#__

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC rule 3745-270-09(B)].*

NOTIFICATION/CERTIFICATION

7. ***For wastes that do not meet treatment standards:*** Has the generator submitted a one-time written notice to the treatment/storage facility receiving the wastes, that wastes being received do not meet treatment standards? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No__ N/A ___RMK#__

If so, does the notice including the following:

a. EPA hazardous waste number? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No__ N/A ___RMK#__

b. Appropriate treatment standard for the waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No__ N/A ___RMK#__

c. The manifest number associated with the first shipment of waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No__ N/A ___RMK#__

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No__ N/A ___RMK#__

e. Applicable wastewater/non-wastewater category [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No__ N/A ___RMK#__

f. For hazardous debris, list the contaminants subject to treatment, as described in paragraph (B) of OAC rule 3745-270-45; and an indication that these contaminants are being treated to comply with OAC rule 3745-270-45. Yes X No__ N/A ___RMK#__

g. For contaminated soil list the constituents subject to treatment as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. Yes X No__ N/A ___RMK#__

8. ***For wastes that meet treatment standards:*** Does the generator submit a one-time written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes X No__ N/A __RMK#__

If so, does the notice/certification including the following:

a. EPA hazardous waste identification number? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes X No__ N/A __RMK#__

b. The corresponding treatment standards and applicable prohibitions for the waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes X No__ N/A __RMK#__

c. The manifest number associated with the shipment of waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes X No__ N/A __RMK#__

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes X No__ N/A __RMK#__

e. Is the certification signed by the generator or an authorized representative? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes X No__ N/A __RMK#__

f. For contaminated soil list the constituents subject to treatment as described as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. — Yes X No__ N/A __RMK#__

9. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years? [OAC rule 3745-270-07(A)(8); Condition B.36.(j)] — Yes X No__ N/A __RMK#__

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

NOTE: *The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate LDR wastes that do not meet treatment standards in tanks or containers. A LQG who stores LDR wastes on-site for greater than 90 days becomes a operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.*

NOTE: *The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [OAC rule 3745-270-50(E); 40 CFR 268.50(e)]*

10. Is the owner/operator storing LDR restricted wastes in containers? If so, is each container marked with the following information in accordance with OAC rule 3745-270-50(A)(2)(a) [Condition B.36(l)] — Yes X No__ N/A __RMK#__

a. The identification of the contents? — Yes X No__ N/A __RMK#__

b. The date which accumulation began?

NOTE: *A TSD facility may store LDR wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [OAC rule 3745-270-50(B)]. During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.*

11. Are LDR wastes being stored at the facility for greater than one year? If so,

a. Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [OAC rule 3745-270-50(B); Condition B.36(m)]

Yes X No___ N/A ___RMK#___

LARGE QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS			
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more			
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less			
GENERAL REQUIREMENTS			
1.	Has the LQUWH obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)]		Yes ☑ No ☐ N/A ☐
PROHIBITIONS			
2.	Did the LQUWH dispose of universal waste? [3745-273-31(A)]		Yes ☐ No ☒ N/A ☐
3.	Did the LQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-37 or managing specific wastes as provided in OAC rule 3745-273-33? [3745-273-31(B)] (this change makes it like the SQUWH checklist)		Yes ☐ No ☑ N/A ☐
WASTE MANAGEMENT AND LABELING/MARKING			
UNIVERSAL WASTE BATTERIES			
4.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)]		Yes ☒ No ☐ N/A ☐
5.	If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(A)(1)]		Yes ☒ No ☐ N/A ☐
6.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-33(A)]		Yes ☐ No ☒ N/A ☐
7.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)(3)]		Yes ☐ No ☐ N/A ☒
	a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)]	Yes ☒ No ☐ N/A ☐
	b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)]	Yes ☒ No ☐ N/A ☐
8.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-34(A)]		Yes ☒ No ☐ N/A ☐
UNIVERSAL WASTE PESTICIDES			
9.	Does the LQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-33(B)(1)]		Yes ☒ No ☐ N/A ☐
10.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-33(B)(2)]		Yes ☒ No ☐ N/A ☐
11.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97; 3745-66-100 and 3745-66-101 of the OAC met? [3745-273-33(B)(3)]		Yes ☐ No ☐ N/A ☒
12.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-33(B)(4)]		Yes ☐ No ☐ N/A ☒
13.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)]		Yes ☒ No ☐ N/A ☐

14.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(C)(1)&(2)]		Yes ☒ No ☐ N/A ☐
UNIVERSAL WASTE THERMOSTATS			
15.	Have thermostats that show evidence of leakage, spillage or damage that could cause leaks been contained in a container that is closed, structurally sound, compatible with contents of the thermostats and lacks evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(C)(1)]		Yes ☒ No ☐ N/A ☐
16.	If the mercury-containing ampules are removed, does the LQUWH: [3745-273-33(C)(2)]		
	a.	Remove the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-33(C)(2)(a)&(b)]	Yes ☒ No ☐ N/A ☐
	b.	Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-33(C)(2)(c)&(d)]	Yes ☒ No ☐ N/A ☐
	c.	Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-33(C)(2)(e)]	Yes ☒ No ☐ N/A ☐
	d.	Ensure that employees are thoroughly familiar with proper waste handling and emergency procedures? [3745-273-33(C)(2)(f)]	Yes ☒ No ☐ N/A ☐
	e.	Ensure removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-33(C)(2)(g)]	Yes ☒ No ☐ N/A ☐
	f.	Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-33(C)(2)(h)]	Yes ☒ No ☐ N/A ☐
17.	When removing mercury containing ampules from thermostats if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining thermostat units), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-33(C)(3)(a)]		Yes ☒ No ☐ N/A ☐
	a.	If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-33(C)(3)(b)]	Yes ☒ No ☐ N/A ☐
18.	Are the thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)?" [3745-273-34(D)]		Yes ☒ No ☐ N/A ☐
UNIVERSAL WASTE LAMPS			
19.	Does the LQUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(D)(1)]		Yes ☒ No ☐ N/A ☐
20.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous constituents to the environment? [3745-273-33(D)(2)]		Yes ☒ No ☐ N/A ☐

NOTE: ***Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted***

for such activities [3745-273-31(B)]. *A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.*		
21.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamps?" [3745-273-34(E)]	Yes ☒ No ☐ N/A ☐
ACCUMULATION TIME		
22.	Is the waste accumulated for less than one year? [3745-273-35(A)]	Yes ☒ No ☐ N/A ☐
	a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate.) [3745-273-35(B)]	Yes ☒ No ☐ N/A ☐
NOTE: Accumulation is defined as date generated or date received from another handler.		
23.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-35(C)] If yes, describe below: [illegible]	Yes ☒ No ☐ N/A ☐
EMPLOYEE TRAINING		
24.	Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36]	Yes ☒ No ☐ N/A ☐
RESPONSE TO RELEASES		
25.	Are releases of universal waste and other residues immediately contained? [3745-273-37(A)]	Yes ☒ No ☐ N/A ☐
26.	Is the material released characterized? [3745-273-37(B)]	Yes ☒ No ☐ N/A ☐
27.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-37(C)]	Yes ☒ No ☐ N/A ☐
OFF-SITE SHIPMENTS		
NOTE: If a LQUWH self-transports wastes, then the handler must comply with the Universal Waste transporter requirements.		
28.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)]	Yes ☒ No ☐ N/A ☐
29.	Is the handler aware of DOT requirements for packaging and shipping? If not, make aware of 40 CFR 171-180.	Yes ☒ No ☐ N/A ☐
30.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)]	Yes ☒ No ☐ N/A ☐
31.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes ☐ No ☒ N/A ☐
	a. If yes, did the originating handler receive the waste back or agree to where shipment was sent? [3745-273-38(E)(2)]	Yes ☐ No ☐ N/A ☒
32.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler to discuss and do <u>one of the following</u>:	Yes ☐ No ☐ N/A ☒

	a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-38(F)(2)]	Yes ☒ No ☐ N/A ☐
33.		If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)]	Yes ☒ No ☐ N/A ☐
TRACKING UNIVERSAL WASTE SHIPMENTS			
34.		Are universal wastes received from another handler? If so:	Yes ☐ No ☒ N/A ☐
	a.	Is a record (log, invoice, manifest, bill of lading, or other shipping document) of each shipment kept? [3745-273-39(A)]	Yes ☐ No ☐ N/A ☒
35.		Does the record include the following:	
	a.	Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)]	Yes ☐ No ☐ N/A ☐
	b.	Quantity of each type of universal waste? [3745-273-39(A)(2)]	Yes ☐ No ☐ N/A ☐
	c.	Date received? [3745-273-39(A)(3)]	Yes ☐ No ☐ N/A ☐
36.		Is universal waste shipped to another handler? If so:	Yes ☐ No ☒ N/A ☐
	a.	Is a record of each shipment kept? [3745-273-39(B)]	Yes ☐ No ☐ N/A ☒
37.		Does the record include the following?	
	a.	Name and address of universal waste handler, destination facility, or foreign destination? [3745-273-39(B)(1)]	Yes ☐ No ☐ N/A ☐
	b.	Quantity of each type of universal waste? [3745-273-39(B)(2)]	Yes ☐ No ☐ N/A ☐
	c.	Date shipped? [3745-273-39(B)(3)]	Yes ☐ No ☐ N/A ☐
38.		Are records kept for three years? [3745-273-39(C)(1)&(2)]	Yes ☐ No ☐ N/A ☐
EXPORTS			
39.		Is waste being sent to a foreign destination? If so:	Yes ☐ No ☒ N/A ☐
	a.	Does the large quantity handler comply with primary exporter requirements in OAC rules 3745-52-53. 3745-52-56 and 3745-52-57? [3745-273-40(A)]	Yes ☐ No ☐ N/A ☐
	b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-40(B)]	Yes ☐ No ☐ N/A ☐
	c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)]	Yes ☐ No ☐ N/A ☐

TSD LDR CHECKLIST			
TREATING FACILITIES WHICH TREAT WASTE TO MEET LDR STANDARDS			
1.	Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-13? [3745-270-07(B)]		Yes ☐ No ☐ N/A ☒
2.	Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745 27 007(B)(3)]		Yes ☒ No ☐ N/A ☒
NOTE: No further notification is necessary until such time that the waste changes or the receiving facility changes.			
3.	Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07? [3745-270-07(B)(3)]		Yes ☒ No ☐ N/A ☐
4.	Are wastes or treatment residues being sent to another TSD to be further managed? If so:		Yes ☒ No ☐ N/A ☐
	a.	Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)]	
5.	Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-266-20? If so:		Yes ☒ No ☐ N/A ☐
	a.	Has the treatment facility (recycler) sent to the director a notice (with information listed in 3745-270-07(B)(3) excluding the manifest number), with each shipment of waste? [3745-270-07(B)(6)]	Yes ☒ No ☐ N/A ☐
	b.	Has the treatment facility (recycler) sent to the director a certification (as described in 3745-270-07(B)(4)),with each shipment of waste? [3745-270-07(B)(6)]	Yes ☒ No ☐ N/A ☐
6.	Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)]		Yes ☒ No ☐ N/A ☐
7.	Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have:		Yes ☒ No ☐ N/A ☐
	a.	Copies of all notices and certifications required in 3745-270?	Yes ☒ No ☐ N/A ☐
	b.	Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49?	Yes ☒ No ☐ N/A ☐
	c.	The testing frequency specified in the facility's WAP and have they followed the protocol?	Yes ☒ No ☐ N/A ☐
HAZARDOUS DEBRIS			
8.	Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)?		Yes ☒ No ☐ N/A ☐
9.	Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49?		Yes ☒ No ☐ N/A ☐
10.	Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so:		Yes ☒ No ☐ N/A ☐
	a.	Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)]	Yes ☒ No ☐ N/A ☐
NOTE: If immobilization has been used in a treatment train, it must be the last treatment technology used.			
11.	Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so:		Yes ☐ No ☐ N/A ☒
	a.	Was immobilization the last treatment technology used? [3745-270-45(A)(3)]	Yes ☐ No ☐ N/A ☒
12.	Is the waste a PCB waste under 40 CFR Part 761? If so:		Yes ☐ No ☒ N/A ☐
	a.	Has the waste been treated to the most stringent standard in 40 CFR 761 or 3745-270-45? [3745-270-45(A)(5)]	Yes ☐ No ☐ N/A ☒

13.	Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)]		Yes ☐ No ☐ N/A ☒
14.	Does the owner/operator of a treatment facility that claims the debris is excluded from regulation as a hazardous waste under 3745-51-03(F)(1) maintain the following information?		Yes ☐ No ☐ N/A ☒
	a.	Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)]	Yes ☐ No ☐ N/A ☐
	b.	Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)]	Yes ☐ No ☐ N/A ☐
	c.	A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)]	Yes ☐ No ☐ N/A ☐
15.	Does the notification of an owner/operator who first claims the debris is excluded under 3745-51-03(F)(1) have the following information: [3745-270-07(D)(3)]		Yes ☐ No ☐ N/A ☐
	a.	Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)]	Yes ☐ No ☐ N/A ☐
	b.	Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)]	Yes ☐ No ☐ N/A ☐
	c.	Technology used from Table 1? [3745-270-07(D)(1)(c)]	Yes ☐ No ☐ N/A ☐
16.	Has the above notification been sent to the director? [3745-270-07(D)(1)]		Yes ☐ No ☐ N/A ☐

USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

OTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and as an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS			
1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:		Yes ☐ No ☒ N/A ☐
	a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes ☐ No ☐ N/A ☒
NOTE: For example, used oil contaminated scrap metal stored in a pile.			
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]		Yes ☐ No ☒ N/A ☐
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?		Yes ☐ No ☒ N/A ☐
NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).			
GENERATOR STANDARDS			
4.	Does the generator mix hazardous waste with used oil? If so,		Yes ☐ No ☒ N/A ☐
	a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes ☐ No ☐ N/A ☒
NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.			
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 ☐
NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.			
6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]		Yes ☐ No ☒ N/A ☐
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 ☐
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 ☐
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]		Yes ☒ No ☐ N/A ☐
	a.	Stopped the release?	Yes ☒ No ☐ N/A ☐
	b.	Contained the release?	Yes ☒ No ☐ N/A ☐
	c.	Cleaned up and properly managed the used oil and other materials?	Yes ☒ No ☐ N/A ☐
	d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes ☒ No ☐ N/A ☐
ON-SITE BURNING IN SPACE HEATER			
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:		
	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 ☐

	b.	Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour?	Yes ☐ No ☐ N/A ☐
	c.	Are the combustion gases from heater vented to the ambient air?	Yes ☐ No ☐ N/A ☐
NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).			
GENERATOR TRANSPORTATION			
11.		Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes ☒ No ☐ N/A ☐
12.		If the generator self-transports used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
	a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes ☐ No ☒ N/A ☐
	b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes ☐ No ☐ N/A ☒
NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).			
COLLECTION CENTERS AND AGGREGATION POINTS			
13.		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 ☒
14.		Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes ☐ No ☐ N/A ☐
15.		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 ☐
NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.			

Land and Chemicals Division

Type of Document:
- ☒ Notice of Violation Letter and Letter of Acknowledgment
- ☐ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action

Facility Name: Portsmouth Gaseous Diffuson Plant

Facility Location: 3930 US Route 23 South

City: Piketon **State:** Ohio

U.S. EPA ID# OH7 890 008 983

Assigned Staff W. Francis **Phone:** 312-353-4921

Name	Signature	Date
Author **W. Francis**	W.	2/2/2010
Regional Counsel **T. Thurlow**	T Thurlow	3/4/10
Section Chief **P. Little**		3-8-10
Branch Chief **W. Harris**	WHH	3/8/10

RTC MG 3/9

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
   Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 1 02010

REPLY TO THE ATTENTION OF
LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William E. Murphie
Manager
Portsmouth/Paducah Project Office
U.S. Department of Energy
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

Mr. W.A. Franz
Project Manager
LATA/Parallax Portsmouth, LLC
P.O. Box 855
Piketon, Ohio 45661

Re: Notice of Violation/Return to Compliance
RCRA Compliance Inspection
Portsmouth Gaseous Diffusion Plant
Piketon, Ohio
OH7 890 008 983

Dear Messrs. Murphie and Franz:

On June 22 and June 23, 2009, representatives of the U.S. Environmental Protection Agency and Ohio Environmental Protection Agency (OEPA) inspected your installation located at 3930 US Route 23 South, Piketon, Ohio. The purpose of the inspection was to evaluate compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based upon information provided by U.S. Department of Energy (DOE) and LATA/Parallax Portsmouth, LLC (LATA/Parallax) personnel, review of records, and physical observations by the inspectors, EPA has determined that DOE and LATA/Parallax violated a certain requirement of the Ohio Administrative Code (OAC) and the United States Code of Federal Regulations (CFR). We find that DOE and LATA/Parallax were in noncompliance with the following requirement:

- A large quantity generator storing containers of hazardous waste must comply with OAC Rule 3745-52-34(C)(1)(b) [40 CFR § 262.34(c)(1)(ii)], which requires that each

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

hazardous waste container, while being accumulated on-site, must be labeled with the words "Hazardous Waste" or with other words that identify the contents of the container. See, OAC Rule 3745-52-34(C)(1)(b).

During the inspection of Building X-627, the inspectors observed one 55-gallon container labeled "Trichloroethylene." The 55-gallon container was missing the words hazardous waste or other words identifying the contents as waste, as required by OAC Rule 3745-52-34(C)(1)(b). At the time of the inspection, DOE & LATA/Parallax, therefore, failed to comply with the above-referenced hazardous waste generator requirement. Later in the inspection, DOE and LATA/Parallax personnel provided the inspectors with a photograph of the 55-gallon SAA container in Building X-627, labeled "Waste Trichloroethylene." Based on this information, DOE and LATA/Parallax have resolved the violation of OAC Rule 3745-52-34(C)(1)(b) [40 CFR ' 262.34(c)(1)(ii)].

This letter is to inform you that EPA has reviewed the referenced information, and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA and the Ohio EPA will continue to evaluate DOE and LATA/Parallax in the future.

If you have any questions regarding this letter, please contact Walt Francis, of my staff, at (312) 353-4921.

Sincerely,

Willie H. Harris, P.E.
Chief, RCRA Branch
Land and Chemicals Division

Enclosure

cc: Melody Stewart, OEPA – Southeast District Office

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME:	**PORTSMOUTH GASEOUS DIFFUSION PLANT**
FACILITY U.S. EPA ID NO.:	**OH7 890 008 983**
FACILITY TYPE:	**Large Quantity Generator/Container Storage Facility**
FACILITY ADDRESS:	3930 US Route 23 South Piketon, Ohio 45661
U.S. EPA REPRESENTATIVE:	Walt Francis
DATE(S) OF INSPECTION:	June 22nd and June 23rd, 2009
SIC CODE:	**2819** - Industrial Inorganic Chemicals, Not Elsewhere Classified
NAICS CODE:	**325188** - All Other Basic Inorganic Chemical Manufacturing

PREPARED BY: _____ 7/8/09
Walt Francis **Date**
Environmental Scientist

ACCEPTED BY: _____ 7-13-09
Paul Little, Chief **Date**
Compliance Section 2
RCRA Branch

Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the U.S. Department of Energy Portsmouth Gaseous Diffusion Plant (Portsmouth), Piketon, Ohio to determine its compliance with the Resource Conservation and Recovery Act (RCRA), the Ohio Administrative Code (OAC), and the RCRA Permit requirements with respect to U.S. DOE's management of hazardous waste, universal waste and used oil.

Participants

U.S. Environmental Protection Agency (U.S. EPA) Inspector -
Walt Francis, Environmental Scientist

Ohio Environmental Protection Agency (Ohio EPA) Inspector -
Melody Stewart, Hazardous Waste Inspector

Representatives of U.S. DOE, LATA/Parallax, and Theta/Pro2Serve Management Company (TPMC) -
Melda Rafferty, U.S. DOE
Rosemary Richmond, LATA/Parallax Portsmouth, LLC
James Tomlin, Theta/Pro2Serve Management Company

Site Description/Background Information

Historically, the main function of the Portsmouth facility was to enrich uranium for military use (nuclear submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in uranium hexafluoride (UF6) feedstock which contains 0.711% U235. The Plant had produced enriched uranium continuously since September 1954. In 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). U.S. DOE retained ownership of the ongoing site environmental restoration program as well as two permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and are leased by USEC. These include decontamination of equipment and uranium recovery (X-705 Bldg.); chemical cleaning of equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); photo and printing lab (X-100); vehicle repair (X-750); coal pile runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in U.S. DOE owned and permitted storage

facilities. Waste generated by U.S. DOE and LATA/Parallax from the environmental restoration is also stored in these facilities. USEC also generates non mixed radioactive hazardous waste which is shipped out of Building XT-847. USEC ceased the enrichment process in May 2001.

Uranium contaminated hazardous wastes (mixed waste) which were/are generated by USEC and U.S. DOE are stored on-site in U.S. DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of treatment, storage and disposal (TSD) facilities in the United States which could accept mixed waste, and a May 1991 U.S. DOE moratorium on off-site waste shipment. A large percentage of the waste generated at Portsmouth is U.S. DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in U.S. DOE-owned storage areas. U.S. DOE sends some waste off-site (to U.S. DOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to U.S. DOE - Portsmouth for storage in the interim prior to their final disposal.

U.S. DOE/LATA Parallax generated hazardous wastes are primarily shipped to Energy Solutions, Clive, Utah, Perma-Fix, Gainesville, Florida, and Diversified Scientific Services, Inc. (DSSI), Kingston, Tennessee. In addition, a wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes. UDS is working on a project to recover material from depleted uranium hexafluoride cylinders.

Opening Conference

On June 22, 2009, Walt Francis and Melody Stewart arrived at Building X-1000 at approximately 8:00 a.m. and informed the U.S. DOE and LATA/Parallax representatives of the nature, scope, and procedures for the RCRA inspection. The inspection was conducted by U.S. EPA and OEPA personnel as a Federal lead inspection. The facility representatives provided the team with a brief update of the facility since the last inspection. Ms. Rosemary Richmond allowed the inspectors access to the facility to conduct the inspection.

Site Tour

The walk-through began in Building X-720 where TPMC maintains a universal waste lamp accumulation area. The inspectors observed several containers of used fluorescent lamps. The inspection continued to Building X-700, where Mr. James Tomlin showed the inspectors several satellite accumulation area (SAA) containers, several containers of used oil and an area for accumulation of universal waste. Inspector Francis observed three SAA containers: a 30-gallon container labeled "Rags/Paint Debris"; a 10-gallon container labeled "Aerosol Cans"; and a 5-gallon container labeled "Paint and Solvents". The universal waste area included containers of used circuit boards, used batteries and used fluorescent lamps. Inspector Francis observed that the boxes of used fluorescent lamps were labeled with a "6/11/2009" accumulation date. Inspector Stewart located a spill control kit in the Paint Shop area. The inspection continued to Building X-623 where Mr. Greg Thompsen showed the inspectors where U.S. DOE maintains a less than 90 day hazardous waste accumulation area and a SAA for waste TCE. Inspector

Francis observed that the hazardous waste less-than-90 day area did not contain any containers of hazardous waste. The inspectors also reviewed the weekly inspection logs for Building X-623. The inspection continued to the X-701B area where U.S. DOE maintains a less than 90 day accumulation area. The inspectors observed an emergency response spill kit and a weekly inspection log. The walkthrough continued at Building X-627 where Mr. Greg Thompsen showed the inspectors a 55-gallon SAA container. Inspector Francis observed a 55-gallon container that was labeled Waste "PPE/Bag Filters F001". The inspection continued to Building X-624 where U.S. DOE maintains a SAA container. The inspectors observed a 55-gallon container of PPE, filters and debris. Inspector Francis observed a 55-gallon container labeled "TCE" which was connected to the groundwater pump and treat system. The walkthrough continued at Building X-345, where Ms. Bridgette Eslinger showed the inspectors an empty SAA area and explained the small cylinder processing procedure. The walkthrough continued to Building X-770, where the inspectors observed a less-than 90 day hazardous waste accumulation area, which was empty and then to Building X-334. At Building X-334, Mr. Doug Questa showed the inspectors a universal waste accumulation area, which contained used batteries, and used fluorescent lamps,

The inspection continued at Building X-624 where U.S. DOE maintains an SAA area for "PPE/Filters F001". The inspection continued to the west L-Cage area in Building X-326. Inspector Francis observed approximately thirty 55-gallon containers labeled "Gunk D007/D008 3/3/1992" and approximately twelve 55-gallon containers labeled "Ash D006/D007/D008/D009/D011 3/3/92". The walk-through continued to Area #1, which was empty and then to Area 5, and then to Area 2. The inspection continued to Area 4, and then to an SAA in Building X-326. The inspection continued to an SAA in Building X-330 and then to an SAA in building X-333.

The inspectors then returned to Building X-1000 to review records.

Records Review

A record review was conducted. The inspection team requested to review hazardous waste manifests, land disposal restriction forms, mixed-waste shipment documentation, universal waste and used oil shipping records, personnel training information, weekly inspection logs, waste profiles for hazardous waste in storage, and the latest version of the contingency plan. The inspectors reviewed hazardous waste manifests since the date of the last inspection, two years of personnel training records, waste profiles, and weekly inspection logs. The inspectors reviewed a Contingency Plan that was last updated on June 20, 2007.

Closing Conference

The inspectors conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. U.S. DOE and LATA/Parallax would then receive a letter from U.S. EPA regarding the inspection including a

copy of the inspection report, and completed inspection checklists. Inspector Francis said that during the inspection of Building X-627, he observed an SAA container labeled "TCE", not "Waste TCE". Inspector Stewart said that the weekly inspection logs should include SAA spill kits.

Attachments
Inspection Checklists.

Land and Chemicals Division

Type of Document:
- ☐ Notice of Violation and Inspection Report/Checklist
- ☒ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action

Facility Name : Portsmouth Gaseous Diffusion Plant

Facility Location: 3930 U.S Route 23 South

City: Piketon **State: Ohio**

U.S. EPA ID# OH7 890 008 983

Assigned Staff W. Francis **Phone: 312-353-4921**

Name	Signature	Date
Author **W. Francis**	W. F	7/28/09
Regional Counsel	----------	
Section Chief **P. Little**		7-28-09
Branch Chief	W H H	8/4/09

MG 8/3

RT MG 7/31

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's. Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 0 4 2009

REPLY TO THE ATTENTION OF LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William E. Murphie
Manager
Portsmouth/Paducah Project Office
U.S. Department of Energy
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

Mr. W.A. Franz
Project Manager
LATA/Parallax Portsmouth, LLC
P.O. Box 855
Piketon, Ohio 45661

Re: RCRA Compliance Inspection
Portsmouth Gaseous Diffusion Plant
Piketon, Ohio
OH7 890 008 983

Dear Messrs. Murphie and Franz:

On June 9, 2008, U.S. Environmental Protection Agency and Ohio Environmental Protection Agency (Ohio EPA) representatives inspected your installation located in Piketon, Ohio. The purpose of the inspection was to evaluate compliance with certain requirements of the Resource Conservation and Recovery Act; specifically, those regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

As of this writing, based upon information available to EPA and Ohio EPA, our review of the inspection has not resulted in the detection of violations of any of the specific RCRA requirements under evaluation. This determination does not limit the applicability of the requirements evaluated, other RCRA regulations, or regulations under other environmental statutes. EPA and Ohio EPA will continue to evaluate your facility in the future.

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

If you have any questions regarding this letter, please contact Walt Francis, of my staff, at (312) 353-4921.

Sincerely,

Willie H. Harris, P.E.
Chief, RCRA Branch
Land and Chemicals Division

Enclosures

cc: Melody Stewart, Ohio EPA – Southeast District Office

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME:	**PORTSMOUTH GASEOUS DIFFUSION PLANT**
FACILITY U.S. EPA ID NO.:	**OH7 890 008 983**
FACILITY TYPE:	**Large Quantity Generator/Container Storage Facility**
FACILITY ADDRESS:	3930 US Route 23 South Piketon, Ohio 45661
U.S. EPA REPRESENTATIVE:	Walt Francis
DATE(S) OF INSPECTION:	June 9, 2008
SIC CODE:	**2819** - Industrial Inorganic Chemicals, Not Elsewhere Classified
NAICS CODE:	**325188** - All Other Basic Inorganic Chemical Manufacturing

PREPARED BY: _____ 6/24/08
Walt Francis **Date**
Environmental Scientist

ACCEPTED BY: _____ _____
Paul Little, Chief **Date**
Compliance Section 2
RCRA Branch

Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the U.S. Department of Energy Portsmouth Gaseous Diffusion Plant (Portsmouth), Piketon, Ohio to determine its compliance with the Resource Conservation and Recovery Act (RCRA), the Ohio Administrative Code (OAC), and the RCRA Permit requirements with respect to U.S. DOE's management of hazardous waste, universal waste and used oil.

Participants

U.S. Environmental Protection Agency (U.S. EPA) Inspector -
Walt Francis, Environmental Scientist

Ohio Environmental Protection Agency (Ohio EPA) Inspector -
Melody Stewart, Hazardous Waste Inspector

Representatives of U.S. DOE, Theta/Pro2Serve Management Company (TPMC), and LATA/Parallax -
Melda Rafferty, U.S. DOE
Rosemary Richmond, LATA/Parallax Portsmouth, LLC
Chris Guilliams, LATA/Parallax Portsmouth, LLC

Site Description/Background Information

Historically, the main function of the Portsmouth facility was to enrich uranium for military use (nuclear submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in uranium hexafluoride (UF6) feedstock which contains 0.711% U235. The Plant had produced enriched uranium continuously since September 1954. In 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). U.S. DOE retained ownership of the ongoing site environmental restoration program as well as two permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and are leased by USEC. These include decontamination of equipment and uranium recovery (X-705 Bldg.); chemical cleaning of equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); photo and printing lab (X-100); vehicle repair (X-750); coal pile runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in U.S. DOE owned and permitted storage

facilities. Waste generated by U.S. DOE and LATA/Parallax from the environmental restoration is also stored in these facilities. USEC also generates non mixed radioactive hazardous waste which is shipped out of Building XT-847. USEC ceased the enrichment process in May 2001.

Uranium contaminated hazardous wastes (mixed waste) which were/are generated by USEC and U.S. DOE are stored on-site in U.S. DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of TSDs in the United States which could accept mixed waste, and a May 1991 U.S. DOE moratorium on off-site waste shipment. A large percentage of the waste generated at Portsmouth is U.S. DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in U.S. DOE-owned storage areas. During the past year, numerous shipments of hazardous waste were manifested off-site by both U.S. DOE and USEC. This is due to an increase in treatment capacity at off-site commercial treatment facilities and U.S. DOE treatment facilities, the lifting of the moratorium, and the execution of the site treatment plans for U.S. DOE and USEC. U.S. DOE sends some waste off-site (to U.S. DOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to U.S. DOE - Portsmouth for storage in the interim prior to their final disposal.

U.S. DOE/LATA Parallax generated hazardous wastes are primarily shipped to Envirocare of Utah, Inc., Clive, Utah. In addition, a wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes. UDS is working on a project to recover material from depleted uranium hexafluoride cylinders.

Opening Conference

On June 9, 2008, Walt Francis and Melody Stewart arrived at Building X-1000 at approximately 8:00 a.m. and informed the U.S. DOE and LATA/Parallax representatives of the nature, scope, and procedures for the RCRA inspection. The inspection was conducted by U.S. EPA and OEPA personnel as a Federal lead inspection. The facility representatives provided the team with a brief update of the facility since the last inspection. Ms. Rosemary Richmond allowed the inspectors access to the facility to conduct the inspection.

Site Tour

The walk-through began in Building X-622 where U.S. DOE maintains a satellite accumulation area (SAA) container for waste personal protective equipment and bag filters. The inspectors observed one 55-gallon SAA container which was labeled as a F001 hazardous waste. The inspection continued to the X-749 area where U.S. DOE maintains a less than 90 day accumulation area. The inspectors observed two metal boxes utilized to accumulate soil contaminated with TCE laden groundwater from a spill. The boxes were labeled as F001 hazardous waste with 5/2/08 as the accumulation date. The inspectors also reviewed the weekly inspection log at this location. The inspection continued to Building X-624 where U.S. DOE maintains a SAA container. The inspectors observed a 55-gallon container of PPE, filters and

debris. The inspection continued to Building X-747H at the Scrap Yard southwest corner, where U.S. DOE maintains an SAA container. The inspectors observed one 55-gallon SAA container. The inspection continued to Building X-752 where the inspectors observed several containers of scrap metal and a container of used oil. The inspection continued to Building X-623 where Mr. Greg Thompsen showed the inspectors where U.S. DOE maintains a less than 90 day hazardous waste accumulation area and a satellite accumulation area (SAA) for waste TCE. Inspector Francis observed four 55-gallon containers in the less than 90 day hazardous waste accumulation area. Three of the containers were marked "Waste TCE" with an accumulation date of 3/18/08, and hazardous waste code F001 (spent halogenated solvents), one of the containers was marked F001, "DOE, PPE, and Plastic" with a 3/18/08 accumulation date . The walkthrough continued to an area outside of Building X-701B, where the inspectors met Mr. Jeremy Galloway and observed a less than 90 day hazardous waste accumulation area containing three 55-gallon containers. Inspector Francis observed that the containers were marked "Soil and PPE" with an accumulation date of 5/30/08. The walkthrough continued at Building X-627 where Mr. Greg Thompsen showed the inspectors a 55-gallon SAA container. Inspector Francis observed a 55-gallon container that was labeled Waste TCE F001 "PPE/Bag Filters". The inspection continued at Building X-700, where the inspectors met Mr. Gary Coriel, Mr. Phil Moore, and Mr. Cliff Beeks, who showed the inspectors several SAA containers and an area for accumulation of universal waste. Inspector Francis observed three SAA containers, a 30-gallon container labeled "Rags/Paint Debris". A 10-gallon container labeled "Aerosol Cans", and a 5-gallon container labeled "Paint and Solvents". The Universal Waste area included containers of used circuit boards and used fluorescent lamps. Inspector Francis observed that the boxes of used fluorescent lamps were labeled with accumulation dates. The walkthrough continued to Building X-702, where the inspectors observed an area for the accumulation of universal waste.

The inspection continued at Building X-326 where U.S. DOE maintains several areas for storage of hazardous waste. The walk-through started at Area #2, where the inspectors observed 55-gallon containers of hazardous waste which included "Soil F001 8/7/07", "PCB Oil D018, 2/4/08", and "Alum Sand D009, 3/24/00". The inspection continued to Area #4 where the inspectors observed a 55-gallon container labeled "D002, Mixed Acids 9/4/90", "D018 Lube Oil, 10/31/86". The inspection continued to Area Number 3 and Area Number 5. The inspection continued to the L-Cage in Building X-326, where the inspectors observed hazardous waste containers in storage. The inspection continued to an SAA area in Building X-326. The inspectors observed one 55-gallon SAA container at Column F-32 labeled "PCB Drip Leg, D009, 2/4/04". The inspectors then returned to Building X-1000 for lunch.

The inspection continued to Building X-334, where U.S. DOE maintains an accumulation area for Universal Waste. The inspectors observed boxes of used universal waste lamps, incandescent lamps, and circuit boards. The inspection continued to Building X-333, where U.S. DOE has a SAA container at DMSA #13. The inspectors observed a 55-gallon container utilized for PCB oil. The inspection continued to Building X-330, where U.S. DOE has a SAA container at DMSA #7. The inspectors observed a 55-gallon container utilized for PCB oil.

The inspectors then returned to Building X-1000 to review records.

Records Review

A record review was conducted. The inspection team requested to review hazardous waste manifests, land disposal restriction forms, mixed-waste shipment documentation, universal waste and used oil shipping records, personnel training information, weekly inspection logs, waste profiles for hazardous waste in storage, and the latest version of the contingency plan. The inspectors reviewed hazardous waste manifests since the date of the last inspection, two years of personnel training records, waste profiles, and weekly inspection logs. The inspectors reviewed a Contingency Plan that was last updated on June 20, 2007.

Closing Conference

The inspectors conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. U.S. DOE and LATA/Parallax would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, and completed inspection checklists. Inspector Francis noted that during the records review the inspectors reviewed a 10/17/07 hazardous waste manifest from LATA/Parallax, Piketon, Ohio to Lata/Parallax, Piketon, Ohio. Ms. Rafferty explained that this shipment was a returned 55-gallon container from the U.S. DOE Nevada Test Site, Mercury, Nevada that contained lead and cadmium. In addition, Inspector Francis discussed the niobium shipment as a D001 ignitable waste. Inspector Stewart said that she would follow up on the shipments of PCB waste to an incinerator.

Attachments
Inspection Checklists.

STATE PART B HAZARDOUS WASTE PERMIT
INSPECTION CHECKLIST

DIVISION OF HAZARDOUS WASTE MANAGEMENT
OHIO EPA
June 2008

Table of Contents
U.S. DOE - Portsmouth Gaseous Diffusion Plant
04-66-0680

RCRA Inspection Checklist .....

General Conditions of Permit 2
General Permit Compliance and Activities 2

Permit Modification, Revision, Revocation 5

Site Entry - Availability of Records 7

Recordkeeping Requirements 7
Confidentiality 7
Operating Record 7
Annual Report Requirement 9
Sampling/monitoring Recordkeeping Requirements 9
Waste Minimization Requirements 10

Off-site Shipments/manifest Requirements 11
Manifest Requirements/wastes Received On-site 11

Waste Analysis/waste Analysis Plan 11
General Requirements 12
Waste Analysis Quality Assurance Requirements 12

General Inspection Requirements 14

Security Provisions/facility Operation 15

Personnel Training 16

Required Equipment 16

Contingency Plan Requirements 17
Emergency Procedures 17
Emergency Authorities 18
Emergency Coordinator 18
Amendment of Plan 18
Implementation of Plan 19

Contingency Plan Requirements 20
Closure Plan/amendment 20
Closure Activities 20

Requirements for Ignitable, Reactive or Incompatible Wastes 22

Storage of Hazardous Wastes in Containers 24
Condition of Containers 25
Inspections 25
Containment System 26
Required Aisle Space 27
Closure and Post-closure 27
Container Storage of Residual Waste 27

Land Disposal Restriction Requirements 28
Prohibition Against Dilution 28
Generator Requirements 28
Notification/certification 29
Storage of Land Disposal Restricted Wastes 31

OHIO PART B PERMITTED FACILITY
RCRA INSPECTION CHECKLIST

Facility: Portsmouth Gaseous Diffusion Plant Ohio Permit #: 04-66-0680

Co-operator: LATA/Parallax Portsmouth, LLC

Address: 3930 U.S. Route 23 South
Piketon, OH 45661

USEPA ID#: OH7 890 008 983
Facility Phone: 740-897-5010

County: Pike

Time: 8:00 -

Inspection Date: 6/9/08

Advance notice of inspection given? ___(Yes) __X__(No)
If so, how far in advance? _____

	Name	***Agency/Title***	***Phone***
Inspector(s):	Walt Francis	U.S. EPA	312-353-4921
	Melody Stewart	Ohio EPA	740-380-5256
Facility	Melda Rafferty	U.S. DOE	740-897-5521
Representative(s):	Rosemary Richmond	Lata/Parallax	740-897-2967

Is facility operating as a generator? Yes __X__ No

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

PERMIT STATUS

Permit Issued: March 15, 2006
Permit Effective Date: March 15, 2006
Permit Expiration Date: March 15, 2011

STORAGE		**TREATMENT**		**DISPOSAL**	
X	Container		Tank		Injection Well
	Tank		Surface Impoundment		Landfill
	Waste Pile		Incinerator		Land Application
	Surface Impoundment		Thermal Treatment		Surface Impoundment

GENERAL CONDITIONS OF PERMIT

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1. Has the expiration date of the permit passed? If so: Yes__ No X N/A ___ RMK# 2011

   a. Is the permittee continuing any activity regulated by the permit after the expiration date of the permit? Yes__ No__ N/A X 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? (Or upon a later date if the permittee can demonstrate good cause for late submittal.) [Condition A.6.(a)] Yes__ No__ N/A X RMK#

NOTE: *The permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:*

   A. The permittee has submitted a timely and complete application for a renewal permit under OAC rule 3745-50-40; and

   B. Through no fault of the permittee, a new permit has not been issued pursuant to OAC rule 3745-50-40 on or before the expiration date of the permit. [Condition A.6.(b)]

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.26] Yes X 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? [Condition A.1.(b) and A.5] Yes__ No X N/A ___ RMK#

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

5. Has the facility identified any instances of noncompliance with the permit, RC Chapter 3734. or the rules adopted thereunder, which may endanger human health or the environment? If so: Yes__ No X N/A ___ RMK#

a. Did the facility immediately report orally the following to Ohio EPA's Emergency Response Section within 24 hours of becoming aware of the circumstance(s): [Condition A.20.(a)]

i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and — Yes__No__ N/A _X_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 or operator? — Yes__No__ N/A _X_RMK#

B. Name, address and telephone number of the facility? — Yes__No__ N/A _X_RMK#

C. Name and quantity of material(s) involved? — Yes__No__ N/A _X_RMK#

D. The extent of injuries, if any? — Yes__No__ N/A _X_RMK#

E. An assessment of the actual or potential hazard to the environment and human health ~~outside the facility~~ where this is applicable? — Yes__No__ N/A _X_RMK#

F. Estimated quantity and disposition of recovered material that resulted from the incident? — Yes__No__ N/A _X_RMK#

6. Did the permittee provide a written report to Ohio EPA's Emergency Response Section and DHWM, SEDO within five days of the time the permittee became aware of the circumstances reported in Question 5? [Condition A.21.] If so did the report contain: — Yes__No__ N/A _X_RMK#

a. A description of the noncompliance and its cause (including exact dates and times)? — Yes__No__ N/A _X_RMK#

b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? — Yes__No__ N/A _X_RMK#

c. Steps taken or planned to minimize the impact on — Yes__No__ N/A _X_RMK#

human health and the environment and to reduce and prevent recurrence of the noncompliance?

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 becomes aware of the circumstances. [Condition A.21.(c)]*

7. Has the permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8] — Yes__No__ N/A _X_RMK#

8. Has the permittee identified any other instances of noncompliance not provided for in Question 5? — Yes__No__ N/A _X_RMK#

   a. If so, did the permittee report to the director within a month of the time at which the permittee is aware of such noncompliance? [Condition A.22.] — Yes__No__ N/A _X_RMK#

   b. Do the reports provided contain the information set forth in Condition A.20? — Yes__No__ N/A _X_RMK#

9. Has the permittee planned any physical alterations or additions to the permitted facility? — Yes__No X_ N/A ___RMK#

   a. If so, has the facility provided Ohio EPA with notice of such changes? [Condition A.15] — Yes__No__ N/A _X_RMK#

Note: *Such notification does not waive the permittee's duty to comply with the permit pursuant to Condition A.5.*

REMARKS

PERMIT MODIFICATION, REVISION, REVOCATION

1. Has the permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.] Yes__No__X_ N/A ___RMK#

2. Has the permit been transferred to a new owner or operator? [Condition A.18.] If so, Yes__No_X_ N/A ___RMK#

   a. Has the transfer been conducted in accordance with R.C. Chapter 3734. and the rules adopted thereunder? [Condition A.18.]; and Yes__No__ N/A _X_RMK#

   b. Before transferring ownership did the permittee notify the new owner in writing of the requirements of R.C. Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.18.] Yes__No__ N/A _X_RMK#

3. Has the permittee submitted reports of compliance or noncompliance with, or any progress reports on the requirements contained 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 _X_RMK#

4. Has the permittee furnished relevant information which Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, or to determine compliance with the permit? [Condition A.10] Yes_X_No__ N/A ___RMK#

5. Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10] Yes_X_No__ N/A ___RMK#

6. 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 HWFB? If so, Yes__No_X_N/A ___RMK#

a. Has the permittee promptly submitted such facts or corrected information to the appropriate entity? [Condition A.24.]

Yes
No
N/A
X
RMK #
7.

Is the permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications to the application? [Condition A.14.(c)]

Yes X No__ N/A ___RMK#

8. Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14.(c)]

Yes X No__ N/A ___RMK#

REMARKS

ITE ENTRY - AVAILABILITY OF RECORDS

As specified in Condition A.11., has the permittee allowed the director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection, 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 X No__ N/A ___RMK#

b. Have access to and copy any records required to be kept under the conditions of the permit? Yes X No__ N/A ___RMK#

c. Inspect at reasonable times facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit? Yes X No__ N/A ___RMK#

d. Sample, document, or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by R.C. Chapter 3734. and the rules adopted thereunder? Yes X No__ N/A ___RMK#

RECORDKEEPING REQUIREMENTS

CONFIDENTIALITY

1. Has the permittee requested confidentiality of any information of the permit in accordance with R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.25.] Yes__No X N/A ___RMK#

OPERATING RECORD

2. Is the permittee maintaining a written operating record at the facility as set forth in OAC rule 3745-54-73 and Condition B.22. of the permit which contains the following elements:

a. A description and the quantity of each hazardous waste received? Yes X No__ N/A ___RMK#

b. Method(s) and date(s) of treatment, storage or disposal at the facility?

Yes X No

c. The location of each hazardous waste within the facility and the quantity at each location? Yes X No__ N/A __RMK#

N/A

RMK #

3. Is the permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents as part of its operating record: [Condition A.28.]

a. Waste analysis plan in accordance with OAC rule 3745-54-13 and the conditions of the permit? Yes X No__ N/A __RMK#

June 2007

b. Contingency plan in accordance with OAC rule 3745-54-53 and the conditions of the permit? Yes X No__ N/A __RMK#

c. Closure plan in accordance with OAC rule 3745-55-12 and the conditions of the permit? Yes X No__ N/A __RMK#

d. Personnel training plan and records required by OAC rule 3745-54-16 and the conditions of the permit? Yes X No__ N/A __RMK#

e. Inspection schedules developed in accordance with OAC rules 3745-54-15 and 3745-55-74 and the conditions of the permit? Yes X No__ N/A __RMK#

4. Have any of the documents identified in Question #3 been revised as required by the permit? If so, Yes X No__ N/A __RMK#

a. Has the permittee submitted the revisions to Ohio EPA? [Condition A.28.(b)] Yes X No__ N/A __RMK#

b. Has the permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.28.(b)] Yes X No__ N/A __RMK#

5. Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from the date of inspection? [Condition A.28.(c)] Yes X No__ N/A __RMK#

NUAL REPORT REQUIREMENT

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 and the conditions of the permit? [Condition B.25.] Yes X No__ N/A ___RMK#

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

7. In compliance with Condition A.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 X No__ N/A ___RMK#

   b. Individual(s) who performed the sampling or measurement? Yes X No__ N/A ___RMK#

   c. Date(s) analyses were performed? Yes X No__ N/A ___RMK#

   d. Individual(s) who performed the analyses? Yes X No__ N/A ___RMK#

   e. Analytical technique(s) or method(s) used? Yes X No__ N/A ___RMK#

   f. Results of such analyses? Yes X No__ N/A ___RMK#

8. 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 A.12.(a)] Yes X No__ N/A ___RMK#

9. Has Ohio EPA requested submittal of any reports or other information required by the conditions of the permit from the permittee? If so, Yes__ No X N/A ___RMK#

   a. Have the submittals been signed and certified according to OAC rules 3745-50-58(K) and 3745-50-42? [Condition A.13.] Yes__ No__ N/A X RMK#

WASTE MINIMIZATION REQUIREMENTS

10. Has the permittee submitted a Waste Minimization Report to Ohio EPA meeting the requirements of Condition A.29. of the permit within 180 days of permit journalization? Yes X No__ N/A ___RMK#

    a. Following the first submittal as identified above in Question #10, has the permittee submitted biennial updates to this report as required by Condition A.29.(c)? Yes X No__ N/A ___RMK#

REMARKS

OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS

	Is all hazardous and mixed waste transported from the facility by a properly registered transporter of hazardous and mixed waste in accordance with all applicable laws, rules and standards? [Condition A.16.]	Yes X No__ N/A __RMK#

MANIFEST REQUIREMENTS/WASTES RECEIVED ON-SITE

2.	Upon receipt of the manifests, has the permittee signed and dated each copy of the manifest? [OAC 3745-54-71(A)(1); Condition B.24.]	Yes X No__ N/A __RMK#
3.	For any significant discrepancies identified upon receipt of the manifest(s): did the permittee note such discrepancies on the manifest(s) in accordance with OAC rule 3745-54-71(A)(2) and Condition B.24?	Yes__No__ N/A X RMK#
	a. Did the permittee attempt to reconcile the discrepancy? [Condition B.24.]	Yes__No__ N/A X RMK#
	b. If the discrepancy was not resolved within 15 days: did the permittee submit a report, including a copy of the manifest, to the director in accordance with OAC rule 3745-54-72(B)? [Condition B.24.]	Yes__No__ N/A X RMK#
4.	Does the permittee immediately give the transporter at least one copy of the signed manifest? [OAC 3745-54-71(A)(3); Condition B.24.]	Yes X No__ N/A __RMK#
5.	Does the permittee provide the generator with a copy of the manifest within 30 days of receipt of waste on-site? [OAC 3745-54-71(A)(4); Condition B.24.]	Yes X No__ N/A __RMK#
6.	Does the permittee retain a copy of each manifest on-site for at least three years from the date of delivery? [OAC 3745-54-71(A)(5); Condition B.24.]	Yes X No__ N/A __RMK#
7.	Has the permittee received any hazardous waste or mixed waste from off-site, other than as described in Condition B.2(b)?	Yes__No X N/A __RMK#

WASTE ANALYSIS/WASTE ANALYSIS PLAN

GENERAL REQUIREMENTS

1. Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information which is necessary to properly treat, store or dispose of the waste in accordance with OAC Chapters 3745-54 to 3745-57 and Condition B.3 of the permit (Section C of the approved permit application)? [OAC 3745-54-13(A)(1)] — Yes X No ___ N/A ___ RMK#

2. Since the last inspection, were any wastes generated by the facility which were unable to be characterized through process knowledge? If so, — Yes ___ No X N/A ___ RMK#

   a. Were the waste analysis procedures described in Section C of the approved permit application followed? — Yes ___ No ___ N/A X RMK#

3. Is the permittee following the procedures described in the approved waste analysis plan (Section C of approved permit application) and the requirements of OAC rule 3745-54-13? [Condition B.3.] — Yes X No ___ N/A ___ RMK#

4. Is the permittee maintaining waste analysis data in the facility's operating record as required by OAC rule 3745-54-73 and Condition B.22. of the permit? — Yes X No ___ N/A ___ RMK#

WASTE ANALYSIS QUALITY ASSURANCE REQUIREMENTS

5. Is the permittee verifying the analysis of each waste stream annually as part of its quality assurance program in accordance with SW-846? [Condition B.3.] — Yes X No ___ N/A ___ RMK#

6. In accordance with Condition B.3. of the permit, does the permittee's quality assurance plan ensure that the permittee is, at a minimum:

   a. Maintaining property functional instruments? — Yes X No ___ N/A ___ RMK#

   b. Using approved sampling/analytical methods? — Yes X No ___ N/A ___ RMK#

c. Verifying the validity of sampling and analytical procedures and performance of correct calculations?

Yes
X
No

N/A

RMK
#
7.

If the permittee uses a contract laboratory to perform analyses, did the permittee inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this permit? [illegible].

Yes X No___ N/A ___RMK#

REMARKS

GENERAL INSPECTION REQUIREMENTS

1. Is the permittee following the inspection procedures and schedules described in Section F of the approved permit application and the requirements of OAC rule 3745-54-15? [Condition B.5.] Yes X No N/A RMK#

2. Does the permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [OAC 3745-54-15(A)(1)(2)] Yes X No N/A RMK#

3. 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? Yes X No N/A RMK#

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

   b. Does the schedule identify the types of problems which are to be looked for during the inspection? [OAC 3745-54-15(B)(3)] Yes X No N/A RMK#

   c. Does the schedule include inspection of areas subject to spills daily when in use and according to other applicable regulations when not in use? [OAC 3745-54-15(B)(4)] Yes X No N/A RMK#

4. 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 X No N/A RMK#

5. Is the permittee maintaining records of inspections for a minimum of three years? [Condition B.5.] Yes X No N/A RMK#

6. 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 X No N/A RMK#

   b. Signature of inspector? Yes X No N/A RMK#

c. Notation of observations made?

es
X
No

d. Date/nature of any repairs or other remedial actions? Yes X No__ N/A ___RMK#

N/A

RMK
#

SECURITY PROVISIONS/FACILITY OPERATION

1. Is the permittee complying with the security provisions of OAC rule 3745-54-14(B)(1) and B(2) and (C) and Section F of the approved permit application, including the following: [Condition B.4.]

   a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility; Yes X No__ N/A ___RMK#

   b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility; or Yes X 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 X No__ N/A ___RMK#

2. In accordance with OAC rule 3445-54-14(C), does the permittee have signs reading "Danger-Unauthorized Personnel Keep Out" posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? [Condition B.4.] Yes X No__ N/A ___RMK#

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 waters? [Condition B.1.] Yes X No__ N/A ___RMK#

REMARKS

PERSONNEL TRAINING

1. Is the facility conducting personnel training in accordance with Section H of the approved permit application and the following requirements of OAC rule 3745-54-16: [Condition B.6.]

   a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC 3745-54-16(A)(B)(C)] — Yes X 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 3745-54-16(B)? — Yes X No__ N/A ___RMK#

   c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(B)? — Yes X 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 X No__ N/A ___RMK#

REQUIRED EQUIPMENT

1. Is the permittee, at a minimum, maintaining the equipment set forth in the approved permit application (Section G) at the facility? [Condition B.9.] — Yes X No__ N/A ___RMK#

2. Is the permittee inspecting, testing, and maintaining the equipment specified in Question #1 to assure its proper operation as specified in OAC rule 3745-54-33, the inspection plans and Section G of the approved permit application? [Condition B.10.] — Yes X 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 Section G of the approved permit application? [Condition B.11.] — Yes X No__ N/A ___RMK#

CONTINGENCY PLAN REQUIREMENTS

EMERGENCY PROCEDURES

1. In compliance with Condition B.13.(a) of the permit, does the permittee:

   a. Familiarize the emergency response agencies likely to respond to an emergency at the facility with:

      i. The location and layout of the facility? Yes X No__ N/A ___RMK#

      ii. Properties of hazardous waste and mixed waste managed at the facility and associated hazards? Yes X No__ N/A ___RMK#

      iii. Places where facility personnel will normally be working? Yes X No__ N/A ___RMK#

      iv. Entrances to and roads inside the facility? Yes X No__ N/A ___RMK#

      v. Evacuation routes as depicted in Section G of the permit application? Yes X No__ N/A ___RMK#

   b. Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the facility, and any further requirements imposed by the permit?; and Yes X No__ N/A ___RMK#

   c. Familiarize local police and fire departments, local hospitals and other local emergency services with the properties of hazardous waste and mixed waste managed at the facility and the types of injuries which could result from fires, explosions or a release of hazardous wastes at the facility? Yes X No__ N/A ___RMK#

2. Is the permittee in compliance with the requirements of OAC rule 3745-54-56 and Section G of the approved permit application regarding emergency procedures? [Condition B.20.] Yes X No__ N/A ___RMK#

EMERGENCY AUTHORITIES

3. 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 X_ 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 X_RMK#

4. 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.] — Yes X_No__ N/A ___RMK#

5. Has the permittee notified the agencies in Question #4, in writing, within ten days of the effective date of any amendments or revisions to the Plan? [Condition B.18.(b)] — Yes X_No__ N/A ___RMK#

6. 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 in accordance with OAC rule 3745-54-53? [Condition B.18.(c)] — Yes X_No__ N/A ___RMK#

EMERGENCY COORDINATOR

7. Is the permittee in compliance with the requirements of OAC rule 3745-54-55 with regard to the emergency coordinator? [Condition B.19.]
   David Kent – Emergency Coordinator — Yes X_No__ N/A ___RMK#

AMENDMENT OF PLAN

8. Is the permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17.] — Yes X_No__ N/A ___RMK#

Note: *Also see Question #4 of RECORDKEEPING REQUIREMENTS to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.*

IMPLEMENTATION OF PLAN

9.	Has there been a fire, explosion or release of hazardous waste or mixed waste or constituents at the facility since the last date of inspection as described by Condition B.14. of the permit? If so,	Yes_X_No_ N/A ___RMK#_1
	a. Did the permittee immediately implement the approved contingency plan and follow the emergency procedures described in OAC rule 3745-54-56? [Condition B.14.]	Yes__No__ N/A _X_RMK#
	b. Did the permittee collect and manage released material, emergency response material and by-products as hazardous waste or mixed waste until making a demonstration to Ohio EPA that such materials are not subject to Ohio hazardous waste rules? [Condition B.16.]	Yes__No__ N/A _X_RMK#
	c. 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 _X_RMK#
	i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23.] ***Note:*** *See also Conditions A.21. and A.22. of the permit for additional reporting/recordkeeping requirements.*	Yes__No__ N/A _X_RMK#
	d. 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? [Condition B.23.]	Yes__No__ N/A _X_RMK#

REMARKS

#1 - Weekly inspection log indicated leaking 55-gallon container on 12/4/07, corrected 12/11/07.

CONTINGENCY PLAN REQUIREMENTS

CLOSURE PLAN/AMENDMENT

1. Is the permittee maintaining at the facility, the approved closure plan which contains the elements set forth in OAC rule 3745-55-12? [Condition B.29.] — Yes X No ___ N/A ___ RMK#

2. Has the permittee amended the closure plan? If so, — Yes ___ No X N/A ___ RMK#

   a. Has the plan been amended in accordance with OAC rule 3745-55-12(C)? [Condition B.28.] — Yes ___ No ___ N/A X 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.*

CLOSURE ACTIVITIES

3. Has the permittee closed the facility? If so, — Yes ___ No X N/A ___ RMK#

   a. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26.] — Yes ___ No ___ N/A X RMK#

   b. Did the permittee carry-out the approved closure plan as set forth in the permit application and terms and conditions of the permit? [Condition B.26.] — Yes ___ No ___ N/A X RMK#

   c. After receiving the final volume of hazardous waste, did the permittee remove from the facility all hazardous waste and mixed 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 X RMK#

   d. 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 X RMK#

e. Did the permittee notify Ohio EPA's Southeast District Office within five working days prior to all rinseate and soil sampling? [Condition B.32.(b)]

Yes
No
N/A
X
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 _X_RMK#

REMARKS

REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

1. Is the permittee following the procedures as specified in OAC rules 3745-54-17, 3745-55-77 and Section F of the approved application when managing ignitable, reactive and/or incompatible wastes? [Conditions B.7.(a) and C.10. and C.11.] — Yes X No ___ N/A ___ RMK#

2. Does the permittee ***not*** store incompatible waste ***except*** in accordance with OAC rules 3745-54-17(B) and 3745-55-77, and the terms and conditions of this permit? [Condition C.11.(a)] — Yes X No ___ N/A ___ RMK#

3. Does the permittee take precautions to prevent placing hazardous waste or mixed waste in an unwashed container that previously held an incompatible waste or material? [Condition C.11.(b)] — Yes X No ___ N/A ___ RMK#

4. Does the permittee ensure that all containers of incompatible wastes are physically separated from other incompatible wastes or materials by a wall, berm, dike, or other device in accordance with OAC rule 3745-55-77 and the Appendix to OAC rule 3745-55-99? [Condition C.11.(c)] — Yes X No ___ N/A ___ RMK#

   a. Are all containers of aqueous hazardous acids (ph $\leq$ 2) and caustics ph $\geq$ 12.5) sorted on different pallets and physically separated in different rooms? [Condition C.11.(c)] — Yes X No ___ N/A ___ RMK#

   b. Are aqueous acids and caustics in poly bottles, and other containers requiring nuclear criticality safety spacing physically separated in the same room by a dike? [Condition C.11.(c)] — Yes X No ___ N/A ___ RMK#

   c. Are containers of cyanides and sodium metals being stored in rooms physically separate from other incompatible wastes or other incompatible materials? [Condition C.11.(c)] — Yes X No ___ N/A ___ RMK#

Does the permittee provide electrical grounding for all containers, tanks and transport vehicles during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(b)]

Yes
X
No

N/A

RMK
#
6. Does the permittee provide and require the use of spark proof tools during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(c)] Yes X No__ N/A ___RMK#

7. Does the permittee prohibit smoking and open flames in areas where hazardous wastes are managed and post appropriate signs? [Condition B.7.(d)] Yes X No__ N/A ___RMK#

8. As required by OAC rule 3745-55-76, does the permittee store containers of ignitable or reactive wastes greater than 15 meters (50 feet) away from the Portsmouth Gaseous Diffusion Plant reservation boundary? [Condition C.10.(a)] Yes X No__ N/A ___RMK#

REMARKS

STORAGE OF HAZARDOUS WASTES IN CONTAINERS

NOTE: *The requirements of permit 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.*

1. Is the permittee storing in containers, only those wastes as specified in Section A of the Part B permit application? [Condition C.1.(a), C.2.] Yes X No__ N/A ___RMK#

2. Does the permittee limit the total quantity of containerized waste in the container storage area to 133,000 gallons at any given time in the permitted container areas, located in building X-326 and no more than 5,456,000 gallons at any given time in the permitted storage areas located in building X-7725? [Condition C.1.(a)] Yes X No__ N/A ___RMK#

NOTE: *For the purposes of compliance with the capacity limitation of the permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity. For example, a 55-gallon drum will be considered to be holding 55 gallons of waste, regardless of the actual quantity stored in the drum. [Condition C.1.(b)]*

3. When accumulating waste within the permitted X-7725 and X-326 container storage area, does the permittee ensure that the total amount of waste (both > 90 days and < 90 days) does not exceed the maximum container storage inventory established under Condition C.1.? [Condition C.1.(c)] Yes X No__ N/A ___RMK#

4. Are hazardous wastes subject to regulation by the permit stored only at the designated container storage area described in the approved permit application? (See Section D of the permit application) [Condition C.1.(a)] Yes X No__ N/A ___RMK#

5. Is each container stored clearly marked to identify its contents and the date each period of accumulation/storage begins? (See Section D of the permit application) [Condition C.3.] Yes X No__ N/A ___RMK#

6. Does the permittee store hazardous waste in the types of containers described in Section D of the approved permit application? [Condition C.1.(a)] Yes X No__ N/A ___RMK#

CONDITION OF CONTAINERS

	Are containers holding hazardous wastes in good condition? [Condition C.3.]	Yes X No__ N/A ___RMK#
	a. If not, (e.g., severe rusting, structural defects) did the permittee transfer the hazardous waste from such a container to a container that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit and OAC rule 3745-55-71? [Condition C.3.]	Yes__No_ N/A _X__RMK#
9.	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 C.4.]	Yes X No__ N/A ___RMK#
10.	Is storage conducted in the container storage containment system as described in Condition C.1. of the permit and Section D of the approved permit application? [Condition C.5.(a)]	Yes X No__ N/A ___RMK#
11.	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 C.5.(b)]	Yes X No__ N/A ___RMK#
12.	Are lab-pack wastes handled in compliance with applicable storage requirements? [Condition C.5.(c)]	Yes X No__ N/A ___RMK#
13.	Are lab-pack wastes packaged in drums containing absorbent material that is compatible with the wastes? [Condition C.5.(d)]	Yes X No__ N/A ___RMK#

INSPECTIONS

14.	Is the permittee inspecting the container area weekly in accordance with OAC rules 3745-54-15, and 3745-54-73 and the approved inspection schedule (Section F) to detect leaking containers and deterioration of containers and the containment system? [Condition C.8.]	Yes X No__ N/A ___RMK#

a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken? [Condition C.8.]

Yes
X
No

N/A

RMK
#

b. On days when containerized waste are added or removed to and/or from any of the permitted areas for storage, does the permittee conduct inspections as described in Section F of the approved Part B permit application and maintain the inspection results in the facility operating record? [Condition C.8.]

Yes X No__ N/A ___RMK#

CONTAINMENT SYSTEM

Does the permittee maintain the containment system as described in Section D of the approved Part B permit application, including: [Condition C.6.] Yes X No__ N/A ___RMK#

a. Sufficient design to contain 10% of the total volume of the containers or the volume of the largest container, whichever is greater? [Condition C.6.(b)] Yes X No__ N/A ___RMK#

b. A system which is free of gaps and sufficiently impervious to contain leaks and spills? Yes X No__ N/A ___RMK#

c. Equipped with a coating which is compatible with each waste stored in the area? Yes X No__ N/A ___RMK#

d. *For those wastes which are deemed incompatible with liner material:* Has the permittee installed a separate secondary containment structure within the existing structure which is equipped with a compatible liner? Yes__No__ N/A X RMK#

16. Has the permittee had a spill or leak of wastes or an accumulation of precipitation in the containment system? If so, Yes__No X N/A ___RMK#

a. Are spilled or leaked wastes and accumulated precipitation removed from the sump or collection area in a timely manner? [Condition C.6.(c)] Yes__No__ N/A X RMK#

b. Does removal of spilled/leaked wastes and accumulated precipitation occur within 24 hours from the time the spill or leak waste is discovered? [Condition C.6.(c)] Yes__No__ N/A X RMK#

REQUIRED AISLE SPACE

17. Is the permittee maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in the event of an emergency to any area of the facility as required by OAC rule 3745-54-35? [Condition B.12.] Yes X No__ N/A ___RMK#

CLOSURE AND POST-CLOSURE

18.	At closure of the container storage area, did the permittee remove all hazardous waste, hazardous waste residues, mixed waste and mixed waste residues from the containment system, in accordance with the procedures set forth in the approved closure plan (Section I of the permit application)? [Condition C.13.(a)]	Yes__No__ N/A _X_RMK#
19.	During closure, if the permittee could not demonstrate that all contaminated soils could be removed, did the permittee close the unit and perform post-closure care following a plan approved by Ohio EPA? [Condition C.13.(b)]	Yes__No__ N/A _X_RMK#

CONTAINER STORAGE OF RESIDUAL WASTE

20.	Is the permittee complying with the provisions of Section C-2E of the application as amended pursuant to Condition B.2.(b) of this permit?	Yes X No__ N/A ___RMK#

AND DISPOSAL RESTRICTION REQUIREMENTS

ROHIBITION AGAINST DILUTION

1. Has the permittee updated the annual Federal Facility Compliance Act Schedule? [OAC rule 3745-270-50; Condition B.36.] — Yes X No__ N/A ___RMK#

2. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [OAC rule 3745-270-40 through 49; Condition B.36.(c)] — Yes__No X_ N/A ___RMK#

   a. As a substitute for adequate treatment to achieve compliance with LDR treatment standards? — Yes__No__ N/A _X_RMK#

   b. To circumvent the effective date of a prohibition (e.g., to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)? — Yes__No__ N/A _X_RMK#

   c. To otherwise avoid a prohibition in OAC rule 3745-270-30 through -39? — Yes__No__ N/A _X_RMK#

   d. To otherwise avoid a prohibition imposed by Section 3004(d) of RCRA? — Yes__No__ N/A _X_RMK#

NOTE: *If the answer to any of Questions 2(a) through 2(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of OAC rule 3745-270-03 [Condition B.36.]. Dilution of wastes is permissible under some conditions. See OAC rule 3745-270-03(B).*

GENERATOR REQUIREMENTS

3. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No_ N/A ___RMK#

   a. ***For determinations based solely on knowledge of the waste:*** Is supporting data used to make this determination being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No__ N/A ___RMK#

b. ***For determinations based upon analytical testing***: Is a copy of waste analysis data being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)]

Yes
X No
N/A
RMK #
4.

Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g., wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [OAC rule 3745-270-07; Condition B.36.(e)]

Yes X No___ N/A ___RMK#

5. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [OAC rule 3745-270-07(A); Condition B.36.(e)]

Yes X No___ N/A ___RMK#

6. Does the entity generate any listed waste(s) which are restricted from land disposal? If so,

Yes X No___ N/A ___RMK#

a. Do such wastes also exhibit hazardous waste characteristics as identified in OAC rules 3745-51-20 to 3745-51-24?

Yes X No___ N/A ___RMK#

b. ***For listed wastes which also exhibit a characteristic***: Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [OAC rule 3745-270-09(A)]

Yes X No___ N/A ___RMK#

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC rule 3745-270-09(B)].*

NOTIFICATION/CERTIFICATION

7. ***For wastes that do not meet treatment standards:*** Has the generator submitted a one-time written notice to the treatment/storage facility receiving the wastes, that wastes being received do not meet treatment standards? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No__ N/A ___RMK#

If so, does the notice including the following:

a. EPA hazardous waste number? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No__ N/A ___RMK#

b. Appropriate treatment standard for the waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)]

Yes X No

N/A

RMK #

c. The manifest number associated with the first shipment of waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No__ N/A ___RMK#

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No__ N/A ___RMK#

e. Applicable wastewater/non-wastewater category [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No__ N/A ___RMK#

f. For hazardous debris, list the contaminants subject to treatment, as described in paragraph (B) of OAC rule 3745-270-45; and an indication that these contaminants are being treated to comply with OAC rule 3745-270-45. — Yes X No__ N/A ___RMK#

g. For contaminated soil list the constituents subject to treatment as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. — Yes X No__ N/A ___RMK#

8. ***For wastes that meet treatment standards:*** Does the generator submit a one-time written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__No__ N/A _X_RMK#

If so, does the notice/certification including the following:

a. EPA hazardous waste identification number? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__No__ N/A _X_RMK#

b. The corresponding treatment standards and applicable prohibitions for the waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__No__ N/A _X_RMK#

c. The manifest number associated with the shipment of waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)]

Yes

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__No__ N/A _X_RMK#

No

N/A
_X_
RMK
#

e. Is the certification signed by the generator or an authorized representative? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__No__ N/A _X_RMK#

f. For contaminated soil list the constituents subject to treatment as described as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. — Yes__No__ N/A _X_RMK#

9. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years? [OAC rule 3745-270-07(A)(8); Condition B.36.(j)] — Yes_X_No__ N/A ___RMK#

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

NOTE: *The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate LDR wastes that do not meet treatment standards in tanks or containers. A LQG who stores LDR wastes on-site for greater than 90 days becomes a operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.*

NOTE: *The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [OAC rule 3745-270-50(E); 40 CFR 268.50(e)]*

10. Is the owner/operator storing LDR restricted wastes in containers? If so, is each container marked with the following information in accordance with OAC rule 3745-270-50(A)(2)(a) [Condition B.36(l)] — Yes X No ___ N/A ___ RMK#

    a. The identification of the contents? — Yes X No ___ N/A ___ RMK#

    b. The date which accumulation began?

NOTE: *A TSD facility may store LDR wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [OAC rule 3745-270-50(B)]. During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.*

11. Are LDR wastes being stored at the facility for greater than one year? If so,

    a. Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [OAC rule 3745-270-50(B); Condition B.36(m)] — Yes X No ___ N/A ___ RMK#

LARGE QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

GENERAL REQUIREMENTS

1. Has the LQUWH obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)] — Yes X No ☐ N/A ___ RMK#___

PROHIBITIONS

2. Did the LQUWH dispose of universal waste? [3845-273-31(A)] — Yes ☐ No X N/A ___ RMK#___

3. Did the LQUWH dilute or treat universal waste, except when responding to releases or by managing specific wastes as provided in OAC 3745-273-33? [3745-273-31(B)] — Yes ☐ No X N/A ___ RMK#___

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES:

4. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)] — Yes X No ☐ N/A ___ RMK#___

5. If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? — Yes X No ☐ N/A ___ RMK#___

6. Does the LQUWH conduct any of the following activities:

   a. Sort batteries by type? — Yes X No___ N/A ___ RMK#___

   b. Mix battery types in one container? — Yes___ No X N/A ___ RMK#___

   c. Discharge batteries to remove the electric charge? — Yes___ No X N/A ___ RMK#___

   d. Regenerate used batteries? — Yes___ No X N/A ___ RMK#___

   e. Disassemble them into individual batteries or cells? — Yes___ No X N/A ___ RMK#___

   f. Remove batteries from consumer products? — Yes___ No X N/A ___ RMK#___

   g. Remove the electrolyte from the battery? — Yes___ No X N/A ___ RMK#___

11. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamps?" [3745-273-34(E)] Yes ✓ No ☐ N/A ___RMK#___

Note: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

12. ***ACCUMULATION TIME***

Is the waste accumulated for less than one year? [3745-273-35(A)] Yes ~~X~~ No ~~X~~ N/A ___RMK#___

a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on handler to demonstrate) [3745-273-35(B)] Yes ~~X~~ No ☐ N/A ~~X~~ RMK#___

NOTE: ***Accumulation is defined as date generated or date received from another handler.***

13. Has the length of time the universal waste has been accumulated documented by ***one*** of the following: [3745-273-35(C)] Yes ✓ No ☐ N/A ___RMK#___

a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-35(C)(1)] Yes ✓ No___ N/A ___RMK#___

b. Marking or labeling the individual item of universal waste with the date that it became a waste or was received? [3745-273-35(C)(2)] Yes ✓ No___ N/A ___RMK#___

c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-35(C)(3)] Yes___ No ✓ N/A ___RMK#___

d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-35(C)(4)] Yes___ No ~~✓~~ N/A ___RMK#___

21. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following: Yes ☒ No ☐ N/A ___RMK#___

a. Receive the waste back? [3745-273-38(E)(1)] Yes ☒ No___ N/A ___RMK#___

b. Agree to where shipment will be sent? [3745-273-38(E)(2)] Yes ☒ No___ N/A ___RMK#___

22. If a handler rejects a partial or full load from another handler, does the receiver handler contact the originating handler and discuss one of the following: Yes ☒ No ☐ N/A ___RMK#___

a. Sending the waste back to originating handler? [3745-273-38(F)(1)] Yes ☒ No___ N/A ___RMK#___

b. Sending the shipment to a destination facility? [3745-273-38(F)(2)] Yes ☒ No___ N/A ___RMK#___

23. If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)] Yes ☒ No ☐ N/A ___RMK#___

24. If the handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-38(H)] Yes ☒ No ☐ N/A ___RMK#___

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA "Acknowledgment of Consent" 3745-52-50 to -52-57? [3745-273-40(B)]

Yes ___ No ❑ N/A ___ RMK#___

c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)]

Yes ___ No ❑ N/A ___ RMK#___

REMARKS

POLLUTION PREVENTION

Note to the Inspector: This checklist has been developed to help the division in gathering general information about the pollution prevention (P2) practices that the company may have initiated or attempted to initiate. The checklist is also used to:

- Facilitate P2 discussions;
- Identify barriers to P2;
- Define the P2 universe;
- Identify the need for future P2 initiatives;
- Identify partnership opportunities; and
- Link companies with better P2 resources.

As a prelude to completing this checklist the inspector should use the following list of questions as a way to initiate a dialogue concerning P2:

1. Have you tried to reduce the volume of waste (hazardous and nonhazardous) that you generate?

2. What is the largest waste stream that you generate?

3. How important would it be to you to eliminate that waste stream?

4. Does your company understand the reduced regulatory burden and cost saving benefits that eliminating or reducing a waste stream can have?

5. Could you use better housekeeping practices to reduce the amount of waste that you generate?

If the company responds with one of the answers below, the appropriate box should be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided in the remarks section.

1. Has the company undertaken any P2 activities to reduce the amount of waste generated? ☑ Yes ☐ No ☐ N/A ☐ RMK#

   a. If so, what has the company done to minimize waste generation?

   - ☑ A change in the process resulting in less waste.
   - ☐ A change in the product resulting in less waste.
   - ☐ Use of fewer and less toxic hazardous raw materials.
   - ☐ Better operations/improved housekeeping.
   - ☐ On-site recycling/reuse of hazardous materials.
   - ☑ Sending waste off-site for recycling/reuse.
   - ☐ Other activities (specify):

REMARKS

USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

OTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS

1. Does the generator manage used oil in a surface impoundment or waste pile? If yes: — Yes ☐ No ☒ N/A ☐

   a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)] — Yes ☐ No ☐ N/A ☒

2. Is used oil used as a dust suppressant? [3745-279-12(B)] — Yes ☐ No ☒ N/A ☐

3. Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)? — Yes ☐ No ☒ N/A ☐

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4. Does the generator mix hazardous waste with used oil? If so, — Yes ☐ No ☒ N/A ☐

   a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] — Yes ☐ No ☐ N/A ☒

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, <u>unless</u> the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

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 ☒

NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6. Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)] — Yes ☐ No ☒ N/A ☐

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 ☐

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 ☐

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 ☑

b. Contained the release? Yes ☐ No ☐ N/A ☑

c. Cleaned up and properly managed the used oil and other materials? Yes ☐ No ☐ N/A ☑

d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ☐ No ☐ N/A ☑

ON-SITE BURNING IN SPACE HEATER

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: Yes ☐ No ☑ N/A ☐

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 ☐

b. Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour? Yes ☐ No ☐ N/A ☐

c. Are the combustion gases from heater vented to the ambient air? Yes ☐ No ☐ N/A ☐

GENERATOR TRANSPORTATION

11. If the generator self-transports used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24] Yes ☐ No ☑ N/A ☐

a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?[3745-279-24] Yes ☐ No ☐ N/A ☐

b. Does the generator transport more than 55 gallons of used oil at any time?[3745-279-24] Yes ☑ No ☐ N/A ☐

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

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 ☐

13. Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31] Yes ☐ No ☐ N/A ☐

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 ☐

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.

Keyword: UsedOilChecklistforGenerators.Oct.2007.doc

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 18 2007

REPLY TO THE ATTENTION OF LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William E. Murphie
Manager
Portsmouth/Paducah Project Office
U.S. Department of Energy
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

Mr. Paul Kreitz
Project Manager
LATA/Parallax Portsmouth, LLC
P.O. Box 855
Piketon, Ohio 45661

Re: RCRA Compliance Inspection
Portsmouth Gaseous Diffusion Plant
Piketon, Ohio
OH7 890 008 983

Dear Messrs. Murphie and Kreitz:

On August 7 and August 8, 2007, United States Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) representatives inspected your installation located in Piketon, Ohio. The purpose of the inspection was to evaluate compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

As of this writing, based upon information available to U.S. EPA and OEPA, our review of the inspection has not resulted in the detection of violations of any of the specific RCRA requirements under evaluation. This determination does not limit the applicability of the requirements evaluated, other RCRA regulations, or regulations under other environmental statutes. U.S. EPA and OEPA will continue to evaluate your facility in the future.

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

If you have any questions regarding this letter, please contact Walt Francis of my staff at (312) 353-4921.

Sincerely yours,

for Paul Little, Chief
Compliance Section #2
RCRA Branch
Land and Chemicals Division

Enclosure

cc: Melody Stewart, OEPA – Southeast District Office

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME:	**PORTSMOUTH GASEOUS DIFFUSION PLANT**
FACILITY U.S. EPA ID NO.:	**OH7 890 008 983**
FACILITY TYPE:	**Large Quantity Generator/Container Storage Facility**
FACILITY ADDRESS:	3930 US Route 23 South Piketon, Ohio 45661
U.S. EPA REPRESENTATIVE:	Walt Francis
DATE(S) OF INSPECTION:	August 7th through August 8th, 2007
SIC CODE:	**2819** - Industrial Inorganic Chemicals, Not Elsewhere Classified
NAICS CODE:	**325188** - All Other Basic Inorganic Chemical Manufacturing

PREPARED BY: Walt F _____ 8/27/07

Walt Francis — **Date**
Environmental Scientist

ACCEPTED BY: Paul Little _____ 8-29-07

Paul Little, Chief — **Date**
Compliance Section 2
RCRA Branch

Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the U.S. Department of Energy Portsmouth Gaseous Diffusion Plant (Portsmouth), Piketon, Ohio to determine its compliance with the Resource Conservation and Recovery Act (RCRA), the Ohio Administrative Code (OAC), and the RCRA Permit requirements with respect to U.S. DOE's management of hazardous waste, universal waste and used oil.

Participants

United States Environmental Protection Agency (U.S. EPA) Inspector -
Walt Francis, Environmental Scientist

Ohio Environmental Protection Agency (Ohio EPA) Inspector -
Melody Stewart, Hazardous Waste Inspector

Representatives of U.S. DOE, Theta/Pro2Serve Management Company (TPMC), LATA/Parallax, and Uranium Disposition Services (UDS) -
Melda Rafferty, U.S. DOE
Rosemary Richmond, LATA/Parallax
Chris Guilliams, LATA/Parallax
John McCoy, Plant Manager UDS
Robert Hoffman, Energy Solutions

Site Description/Background Information

Historically, the main function of the Portsmouth facility was to enrich uranium for military use (nuclear submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in uranium hexafluoride (UF6) feedstock which contains 0.711% U235. The Plant had produced enriched uranium continuously since September 1954. In 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). U.S. DOE retained ownership of the ongoing site environmental restoration program as well as two permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and are leased by USEC. These include decontamination of equipment and uranium recovery (X-705 Bldg.); chemical cleaning of equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); photo and printing lab (X-100); vehicle repair (X-750); coal pile runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in U.S. DOE owned and permitted storage facilities. Waste generated by U.S. DOE and LATA/Parallax from the environmental restoration is also stored in these facilities. USEC also generates non mixed radioactive hazardous waste which is shipped out of Building XT-847. USEC ceased the enrichment process in May 2001.

Uranium contaminated hazardous wastes (mixed waste) which were/are generated by USEC and U.S. DOE are stored on-site in U.S. DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of TSDs in the U.S. which could accept mixed waste, and a May 1991 U.S. DOE moratorium on off-site waste shipment. A large percentage of the waste generated at Portsmouth is U.S. DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in U.S. DOE-owned storage areas. During the past year, numerous shipments of hazardous waste were manifested off-site by both U.S. DOE and USEC. This is due to an increase in treatment capacity at off-site commercial treatment facilities and U.S. DOE treatment facilities, the lifting of the moratorium, and the execution of the site treatment plans for U.S. DOE and USEC. U.S. DOE sends some waste off-site (to U.S. DOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to U.S. DOE - Portsmouth for storage in the interim prior to their final disposal.

U.S. DOE/LATA Parallax generated hazardous wastes are primarily shipped to Envirocare of Utah, Inc., Clive, Utah. In addition, a wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes. UDS is working on a project to recover material from depleted uranium hexafluoride cylinders.

Opening Conference

On August 7, 2007, Walt Francis and Melody Stewart arrived at Building X-1000 and informed the U.S. DOE and LATA/Parallax representatives of the nature, scope, and procedures for the RCRA inspection. The inspection was conducted by U.S. EPA and OEPA personnel as a Federal lead inspection. The facility representatives provided the team with a brief update of the facility since the last inspection. Ms. Rosemary Richmond allowed the inspectors access to the facility to conduct the inspection.

Site Tour

On August 7, 2007, the walk-through began in Building X-623 where U.S. DOE maintains a less than 90 day hazardous waste accumulation area and a satellite accumulation area (SAA) for waste TCE. Inspector Francis observed one 55-gallon container in the less than 90 day hazardous waste accumulation area, with an accumulation date of 6/13/07, and hazardous waste code F001 (spent halogenated solvents). The walkthrough continued to an area outside of Building X-701B, where the inspectors observed a less than 90 day hazardous waste accumulation area containing three 55-gallon containers. The walkthrough continued at Buildings X-627 and X-624 where the inspectors observed several SAAs. The walkthrough

continued at Buildings X-752 and X-622. At Building X-720, we met Mr. Bob Anderson and Mr. Cliff Beeks, who showed the inspectors an area for accumulation of used fluorescent lamps. The walkthrough continued to a maintenance shop in Building X-700, where the inspectors observed an area for the accumulation of universal waste, and an SAA for waste solvent rags and used aerosol cans.

The inspection continued at Building X-326 where the inspectors met Mr. Charles Bearhs. In the Building X-326 L Cage RCRA Permitted Storage area, the inspectors walked around the containers in storage. The walk-through continued in Building X-326, where the inspectors observed a staging area, and hazardous waste storage areas #1, #2, and #3.

The inspectors then returned to Building X-1000 to review records.

The inspectors then went out to the old fire training area and observed some car parts, pieces of glass and wood.

On Wednesday August 8, 2007, the walk-through continued at the UDS offices, where the inspectors met Mr. John McCoy and Mr. Robert Hoffman. Mr. McCoy provided an overview of the UDS construction activities and future plans for recovery of depleted uranium at the Portsmouth site. Inspector Francis asked about the status of UDS getting a U.S. EPA ID number. Mr. McCoy stated that they would be getting their own ID number. Inspector Stewart asked about the UDS activities in the Lithium Warehouse and requested to perform an inspection. Mr. McCoy, Mr. Hoffman and the inspectors then toured the Lithium Warehouse used by UDS for storage.

The inspectors then returned to Building X-1000.

Records Review

A record review was conducted. The inspection team requested to review hazardous waste manifests, land disposal restriction forms, mixed-waste shipment documentation, universal waste and used oil shipping records, personnel training information, weekly inspection logs, waste profiles for hazardous waste in storage, and the latest version of the contingency plan. The inspectors reviewed hazardous waste manifests since the date of the last inspection, two years of personnel training records, waste profiles, and weekly inspection logs. The inspectors reviewed a Contingency Plan that was last updated on June 20, 2007.

Closing Conference

The inspectors conducted a closing conference on August 8, 2007. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. U.S. DOE and LATA/Parallax would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, and completed inspection checklists. Inspector Francis noted that

during the walkthrough of the old burn area, the inspectors observed some burned car parts, glass and wood. Inspector Stewart said that she would follow up with the OEPA solid waste folks. Also, the Inspectors mentioned the old Kenworth truck outside of Building X-744J that appeared to have leaked crankcase oil.

Attachments
Inspection Checklists.

STATE PART B HAZARDOUS WASTE PERMIT INSPECTION CHECKLIST

DIVISION OF HAZARDOUS WASTE MANAGEMENT
OHIO EPA
August 2007

Table of Contents
U.S. DOE - Portsmouth Gaseous Diffusion Plant
04-66-0680

RCRA Inspection Checklist 1

General Conditions of Permit 2
- General Permit Compliance and Activities 2

Permit Modification, Revision, Revocation 5

Site Entry - Availability of Records 7

Recordkeeping Requirements 7
- Confidentiality 7
- Operating Record 7
- Annual Report Requirement 9
- Sampling/monitoring Recordkeeping Requirements 9
- Waste Minimization Requirements 10

Off-site Shipments/manifest Requirements 11
- Manifest Requirements/wastes Received On-site 11

Waste Analysis/waste Analysis Plan 11
- General Requirements 12
- Waste Analysis Quality Assurance Requirements 12

General Inspection Requirements 14

Security Provisions/facility Operation 15

Personnel Training 16

Required Equipment 16

Contingency Plan Requirements 17
- Emergency Procedures 17
- Emergency Authorities 18
- Emergency Coordinator 18
- Amendment of Plan 18
- Implementation of Plan 19

Contingency Plan Requirements 20
- Closure Plan/amendment 20
- Closure Activities 20

Requirements for Ignitable, Reactive or Incompatible Wastes 22

Storage of Hazardous Wastes in Containers 24
- Condition of Containers 25
- Inspections 25
- Containment System 26
- Required Aisle Space 27
- Closure and Post-closure 27
- Container Storage of Residual Waste 27

Land Disposal Restriction Requirements 28
- Prohibition Against Dilution 28
- Generator Requirements 28
- Notification/certification 29
- Storage of Land Disposal Restricted Wastes 31

OHIO PART B PERMITTED FACILITY
RCRA INSPECTION CHECKLIST

Facility: Portsmouth Gaseous Diffusion Plant Ohio Permit #: 04-66-0680

Co-operator: LATA/Parallax Portsmouth, LLC

Address: 3930 U.S. Route 23 South
Piketon, OH 45661

USEPA ID#: OH7 890 008 983
Facility Phone: 740-897-5010

County: Pike

Time: 8:00 -

Inspection Date: 8/6/07 - 8/8/07

Advance notice of inspection given? ___(Yes) __X__(No)
If so, how far in advance? _____

	Name	***Agency/Title***	***Phone***
Inspector(s):	Walt Francis	U.S. EPA	312-353-4921
	Melody Stewart	Ohio EPA	740-380-5256
Facility	Melda Rafferty	U.S. DOE	740-897-5521
Representative(s):	Rosemary Richmond	Lata/Parallax	740-897-2967

Is facility operating as a generator? Yes __X__ No

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

PERMIT STATUS

Permit Issued: March 15, 2006
Permit Effective Date: March 15, 2006
Permit Expiration Date: March 15, 2011

STORAGE		**TREATMENT**		**DISPOSAL**	
X	Container		Tank		Injection Well
	Tank		Surface Impoundment		Landfill
	Waste Pile		Incinerator		Land Application
	Surface Impoundment		Thermal Treatment		Surface Impoundment

GENERAL CONDITIONS OF PERMIT

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1. Has the expiration date of the permit passed? If so: Yes__No X 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 X 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? (Or upon a later date if the permittee can demonstrate good cause for late submittal.) [Condition A.6.(a)] Yes__No__ N/A X RMK#

NOTE: *The permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:*

   A. The permittee has submitted a timely and complete application for a renewal permit under OAC rule 3745-50-40; and

   B. Through no fault of the permittee, a new permit has not been issued pursuant to OAC rule 3745-50-40 on or before the expiration date of the permit. [Condition A.6.(b)]

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.26] Yes X 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? [Condition A.1.(b) and A.5] Yes__No X N/A ___RMK#

4. Have any provisions of the permit been identified as invalid? [Condition A.4.] Yes__No X N/A ___RMK#

5. Has the facility identified any instances of noncompliance with the permit, RC Chapter 3734. or the rules adopted thereunder, which may endanger human health or the environment? If so: Yes__No X N/A ___RMK#

a. Did the facility immediately report orally the following to Ohio EPA's Emergency Response Section within 24 hours of becoming aware of the circumstance(s): [Condition A.20.(a)]

i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and — Yes__No__ N/A _X_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 or operator? — Yes__No__ N/A _X_RMK#

B. Name, address and telephone number of the facility? — Yes__No__ N/A _X_RMK#

C. Name and quantity of material(s) involved? — Yes__No__ N/A _X_RMK#

D. The extent of injuries, if any? — Yes__No__ N/A _X_RMK#

E. An assessment of the actual or potential hazard to the environment and human health outside the facility where this is applicable? — Yes__No__ N/A _X_RMK#

F. Estimated quantity and disposition of recovered material that resulted from the incident? — Yes__No__ N/A _X_RMK#

6. Did the permittee provide a written report to Ohio EPA's Emergency Response Section and DHWM, SEDO within five days of the time the permittee became aware of the circumstances reported in Question 5? [Condition A.21.] If so did the report contain: — Yes__No__ N/A _X_RMK#

a. A description of the noncompliance and its cause (including exact dates and times)? — Yes__No__ N/A _X_RMK#

b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? — Yes__No__ N/A _X_RMK#

c. Steps taken or planned to minimize the impact on — Yes__No__ N/A _X_RMK#

human health and the environment and to reduce and prevent recurrence of the noncompliance?

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 becomes aware of the circumstances. [Condition A.21.(c)]*

7. Has the permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8] — Yes__No__ N/A _X_RMK#

8. Has the permittee identified any other instances of noncompliance not provided for in Question 5? — Yes__No__ N/A _X_RMK#

   a. If so, did the permittee report to the director within a month of the time at which the permittee is aware of such noncompliance? [Condition A.22.] — Yes__No__ N/A _X_RMK#

   b. Do the reports provided contain the information set forth in Condition A.20? — Yes__No__ N/A _X_RMK#

9. Has the permittee planned any physical alterations or additions to the permitted facility? — Yes__No_X_ N/A ___RMK#

   a. If so, has the facility provided Ohio EPA with notice of such changes? [Condition A.15] — Yes__No__ N/A _X_RMK#

Note: *Such notification does not waive the permittee's duty to comply with the permit pursuant to Condition A.5.*

REMARKS

PERMIT MODIFICATION, REVISION, REVOCATION

1. Has the permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.] — Yes X No ___ N/A ___ RMK#

2. Has the permit been transferred to a new owner or operator? [Condition A.18.] If so, — Yes ___ No X N/A ___ RMK#

   a. Has the transfer been conducted in accordance with R.C. Chapter 3734. and the rules adopted thereunder? [Condition A.18.]; and — Yes ___ No ___ N/A X RMK#

   b. Before transferring ownership did the permittee notify the new owner in writing of the requirements of R.C. Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.18.] — Yes ___ No ___ N/A X RMK#

3. Has the permittee submitted reports of compliance or noncompliance with, or any progress reports on the requirements contained 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 X RMK#

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

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

6. 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 HWFB? If so, — Yes ___ No X N/A ___ RMK#

a. Has the permittee promptly submitted such facts or corrected information to the appropriate entity? [Condition A.24.]

Yes No N/A X RMK # 7.	Is the permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications to the application? [Condition A.14.(c)]	Yes X No___ N/A ___RMK#
8.	Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14.(c)]	Yes X No___ N/A ___RMK#

REMARKS

SITE ENTRY - AVAILABILITY OF RECORDS

1. As specified in Condition A.11., has the permittee allowed the director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection, 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 X No ___ N/A ___ RMK#

   b. Have access to and copy any records required to be kept under the conditions of the permit? — Yes X No ___ N/A ___ RMK#

   c. Inspect at reasonable times facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit? — Yes X No ___ N/A ___ RMK#

   d. Sample, document, or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by R.C. Chapter 3734. and the rules adopted thereunder? — Yes X No ___ N/A ___ RMK#

RECORDKEEPING REQUIREMENTS

CONFIDENTIALITY

1. Has the permittee requested confidentiality of any information of the permit in accordance with R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.25.] — Yes ___ No X N/A ___ RMK#

OPERATING RECORD

2. Is the permittee maintaining a written operating record at the facility as set forth in OAC rule 3745-54-73 and Condition B.22. of the permit which contains the following elements:

   a. A description and the quantity of each hazardous waste received? — Yes X No ___ N/A ___ RMK#

b. Method(s) and date(s) of treatment, storage or disposal at the facility?

Yes X No N/A RMK #

c. The location of each hazardous waste within the facility and the quantity at each location? Yes X No N/A RMK#

3. Is the permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents as part of its operating record: [Condition A.28.]

a. Waste analysis plan in accordance with OAC rule 3745-54-13 and the conditions of the permit? Yes X No N/A RMK#

b. Contingency plan in accordance with OAC rule 3745-54-53 and the conditions of the permit? Yes X No N/A RMK#

c. Closure plan in accordance with OAC rule 3745-55-12 and the conditions of the permit? Yes X No N/A RMK#

d. Personnel training plan and records required by OAC rule 3745-54-16 and the conditions of the permit? Yes X No N/A RMK#

e. Inspection schedules developed in accordance with OAC rules 3745-54-15 and 3745-55-74 and the conditions of the permit? Yes X No N/A RMK#

4. Have any of the documents identified in Question #3 been revised as required by the permit? If so, Yes X No N/A RMK#

a. Has the permittee submitted the revisions to Ohio EPA? [Condition A.28.(b)] Yes X No N/A RMK#

b. Has the permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.28.(b)] Yes X No N/A RMK#

5. Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from the date of inspection? [Condition A.28.(c)] Yes X No N/A RMK#

ANNUAL REPORT REQUIREMENT

6. 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 and the conditions of the permit? [Condition B.25.] — Yes X No ___ N/A ___ RMK#

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

7. In compliance with Condition A.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 X No ___ N/A ___ RMK#

   b. Individual(s) who performed the sampling or measurement? — Yes X No ___ N/A ___ RMK#

   c. Date(s) analyses were performed? — Yes X No ___ N/A ___ RMK#

   d. Individual(s) who performed the analyses? — Yes X No ___ N/A ___ RMK#

   e. Analytical technique(s) or method(s) used? — Yes X No ___ N/A ___ RMK#

   f. Results of such analyses? — Yes X No ___ N/A ___ RMK#

8. 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 A.12.(a)] — Yes X No ___ N/A ___ RMK#

9. Has Ohio EPA requested submittal of any reports or other information required by the conditions of the permit from the permittee? If so, — Yes ___ No X N/A ___ RMK#

   a. Have the submittals been signed and certified according to OAC rules 3745-50-58(K) and 3745-50-42? [Condition A.13.] — Yes ___ No ___ N/A X RMK#

WASTE MINIMIZATION REQUIREMENTS

10. Has the permittee submitted a Waste Minimization Report to Ohio EPA meeting the requirements of Condition A.29. of the permit within 180 days of permit journalization? Yes X No___ N/A ___RMK#

    a. Following the first submittal as identified above in Question #10, has the permittee submitted biennial updates to this report as required by Condition A.29.(c)? Yes X No___ N/A ___RMK#

REMARKS

OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS

1. Is all hazardous and mixed waste transported from the facility by a properly registered transporter of hazardous and mixed waste in accordance with all applicable laws, rules and standards? [Condition A.16.] — Yes X No__ N/A __RMK#

MANIFEST REQUIREMENTS/WASTES RECEIVED ON-SITE

2. Upon receipt of the manifests, has the permittee signed and dated each copy of the manifest? [OAC 3745-54-71(A)(1); Condition B.24.] — Yes X No__ N/A __RMK#

3. For any significant discrepancies identified upon receipt of the manifest(s): did the permittee note such discrepancies on the manifest(s) in accordance with OAC rule 3745-54-71(A)(2) and Condition B.24? — Yes__No__ N/A X RMK#

   a. Did the permittee attempt to reconcile the discrepancy? [Condition B.24.] — Yes__No__ N/A X RMK#

   b. If the discrepancy was not resolved within 15 days: did the permittee submit a report, including a copy of the manifest, to the director in accordance with OAC rule 3745-54-72(B)? [Condition B.24.] — Yes__No__ N/A X RMK#

4. Does the permittee immediately give the transporter at least one copy of the signed manifest? [OAC 3745-54-71(A)(3); Condition B.24.] — Yes X No__ N/A __RMK#

5. Does the permittee provide the generator with a copy of the manifest within 30 days of receipt of waste on-site? [OAC 3745-54-71(A)(4); Condition B.24.] — Yes X No__ N/A __RMK#

6. Does the permittee retain a copy of each manifest on-site for at least three years from the date of delivery? [OAC 3745-54-71(A)(5); Condition B.24.] — Yes X No__ N/A __RMK#

7. Has the permittee received any hazardous waste or mixed waste from off-site, other than as described in Condition B.2(b)? — Yes__No X N/A __RMK#

WASTE ANALYSIS/WASTE ANALYSIS PLAN

GENERAL REQUIREMENTS

1. Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information which is necessary to properly treat, store or dispose of the waste in accordance with OAC Chapters 3745-54 to 3745-57 and Condition B.3 of the permit (Section C of the approved permit application)? [OAC 3745-54-13(A)(1)] — Yes X No ___ N/A ___ RMK#

2. Since the last inspection, were any wastes generated by the facility which were unable to be characterized through process knowledge? If so, — Yes ___ No X N/A ___ RMK#

   a. Were the waste analysis procedures described in Section C of the approved permit application followed? — Yes ___ No ___ N/A X RMK#

3. Is the permittee following the procedures described in the approved waste analysis plan (Section C of approved permit application) and the requirements of OAC rule 3745-54-13? [Condition B.3.] — Yes X No ___ N/A ___ RMK#

4. Is the permittee maintaining waste analysis data in the facility's operating record as required by OAC rule 3745-54-73 and Condition B.22. of the permit? — Yes X No ___ N/A ___ RMK#

WASTE ANALYSIS QUALITY ASSURANCE REQUIREMENTS

5. Is the permittee verifying the analysis of each waste stream annually as part of its quality assurance program in accordance with SW-846? [Condition B.3.] — Yes X No ___ N/A ___ RMK#

6. In accordance with Condition B.3. of the permit, does the permittee's quality assurance plan ensure that the permittee is, at a minimum:

   a. Maintaining property functional instruments? — Yes X No ___ N/A ___ RMK#

   b. Using approved sampling/analytical methods? — Yes X No ___ N/A ___ RMK#

c. Verifying the validity of sampling and analytical procedures and performance of correct calculations?

Yes
X
No

N/A

RMK
#
7.

If the permittee uses a contract laboratory to perform analyses, did the permittee inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this permit?

Yes X No__ N/A ___RMK#

REMARKS

GENERAL INSPECTION REQUIREMENTS

1. Is the permittee following the inspection procedures and schedules described in Section F of the approved permit application and the requirements of OAC rule 3745-54-15? [Condition B.5.] — Yes X No__ N/A ___RMK#

2. Does the permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [OAC 3745-54-15(A)(1)(2)] — Yes X No__ N/A ___RMK#

3. 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? — Yes X No__ N/A ___RMK#

   a. Is the schedule kept at the facility? [OAC 3745-54-15(B)(2)] — Yes X No__ N/A ___RMK#

   b. Does the schedule identify the types of problems which are to be looked for during the inspection? [OAC 3745-54-15(B)(3)] — Yes X No__ N/A ___RMK#

   c. Does the schedule include inspection of areas subject to spills daily when in use and according to other applicable regulations when not in use? [OAC 3745-54-15(B)(4)] — Yes X No__ N/A ___RMK#

4. 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 X No__ N/A ___RMK#

5. Is the permittee maintaining records of inspections for a minimum of three years? [Condition B.5.] — Yes X No__ N/A ___RMK#

6. 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 X No__ N/A ___RMK#

   b. Signature of inspector? — Yes X No__ N/A ___RMK#

c. Notation of observations made?

Yes X No N/A RMK #

d. Date/nature of any repairs or other remedial actions? Yes X No ___ N/A ___ RMK#

SECURITY PROVISIONS/FACILITY OPERATION

1. Is the permittee complying with the security provisions of OAC rule 3745-54-14(B)(1) and B(2) and (C) and Section F of the approved permit application, including the following: [Condition B.4.]

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

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

2. In accordance with OAC rule 3445-54-14(C), does the permittee have signs reading "Danger-Unauthorized Personnel Keep Out" posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? [Condition B.4.] Yes X No ___ N/A ___ RMK#

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 waters? [Condition B.1.] Yes X No ___ N/A ___ RMK#

REMARKS

PERSONNEL TRAINING

1. Is the facility conducting personnel training in accordance with Section H of the approved permit application and the following requirements of OAC rule 3745-54-16: [Condition B.6.]

   a. The facility provides personnel training which includes *instruction in safe equipment operation and* emergency procedures and implementation of the contingency plan? [OAC 3745-54-16(A)(B)(C)] — Yes X 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 3745-54-16(B)? — Yes X No__ N/A ___RMK#

   c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(B)? — Yes X 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 X No__ N/A ___RMK#

REQUIRED EQUIPMENT

1. Is the permittee, at a minimum, maintaining the equipment set forth in the approved permit application (Section G) at the facility? [Condition B.9.] — Yes X No__ N/A ___RMK#

2. Is the permittee inspecting, testing, and maintaining the equipment specified in Question #1 to assure its proper operation as specified in OAC rule 3745-54-33, the inspection plans and Section G of the approved permit application? [Condition B.10.] — Yes X 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 Section G of the approved permit application? [Condition B.11.] — Yes X No__ N/A ___RMK#

CONTINGENCY PLAN REQUIREMENTS

EMERGENCY PROCEDURES

1. In compliance with Condition B.13.(a) of the permit, does the permittee:

   a. Familiarize the emergency response agencies likely to respond to an emergency at the facility with:

      i. The location and layout of the facility? — Yes X No__ N/A __RMK#

      ii. Properties of hazardous waste and mixed waste managed at the facility and associated hazards? — Yes X No__ N/A __RMK#

      iii. Places where facility personnel will normally be working? — Yes X No__ N/A __RMK#

      iv. Entrances to and roads inside the facility? — Yes X No__ N/A __RMK#

      v. Evacuation routes as depicted in Section G of the permit application? — Yes X No__ N/A __RMK#

   b. Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the facility, and any further requirements imposed by the permit?; and — Yes X No__ N/A __RMK#

   c. Familiarize local police and fire departments, local hospitals and other local emergency services with the properties of hazardous waste and mixed waste managed at the facility and the types of injuries which could result from fires, explosions or a release of hazardous wastes at the facility? — Yes X No__ N/A __RMK#

2. Is the permittee in compliance with the requirements of OAC rule 3745-54-56 and Section G of the approved permit application regarding emergency procedures? [Condition B.20.] — Yes X No__ N/A __RMK#

EMERGENCY AUTHORITIES

3. 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 X_ 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 X_RMK#

4. 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.] — Yes X_No__ N/A ___RMK#

5. Has the permittee notified the agencies in Question #4, in writing, within ten days of the effective date of any amendments or revisions to the Plan? [Condition B.18.(b)] — Yes X_No__ N/A ___RMK#

6. 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 in accordance with OAC rule 3745-54-53? [Condition B.18.(c)] — Yes X_No__ N/A ___RMK#

EMERGENCY COORDINATOR

7. Is the permittee in compliance with the requirements of OAC rule 3745-54-55 with regard to the emergency coordinator? [Condition B.19.]
   David Kent – Emergency Coordinator — Yes X_No__ N/A ___RMK#

AMENDMENT OF PLAN

8. Is the permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17.] — Yes X_No__ N/A ___RMK#

Note: *Also see Question #4 of RECORDKEEPING REQUIREMENTS to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.*

IMPLEMENTATION OF PLAN

9.	Has there been a fire, explosion or release of hazardous waste or mixed waste or constituents at the facility since the last date of inspection as described by Condition B.14. of the permit? If so,	Yes_X_No_ N/A ___RMK#_1_
	a. Did the permittee immediately implement the approved contingency plan and follow the emergency procedures described in OAC rule 3745-54-56? [Condition B.14.]	Yes__No__ N/A _X_RMK#
	b. Did the permittee collect and manage released material, emergency response material and by-products as hazardous waste or mixed waste until making a demonstration to Ohio EPA that such materials are not subject to Ohio hazardous waste rules? [Condition B.16.]	Yes__No__ N/A _X_RMK#
	c. 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 _X_RMK#
	i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23.] ***Note:*** *See also Conditions A.21. and A.22. of the permit for additional reporting/recordkeeping requirements.*	Yes__No__ N/A _X_RMK#
	d. 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? [Condition B.23.]	Yes__No__ N/A _X_RMK#

REMARKS

#1 - On August 8, 2007, an overpack container that was being moved, started to leak.

CONTINGENCY PLAN REQUIREMENTS

CLOSURE PLAN/AMENDMENT

1. Is the permittee maintaining at the facility, the approved closure plan which contains the elements set forth in OAC rule 3745-55-12? [Condition B.29.] — Yes X No__ N/A ___RMK#

2. Has the permittee amended the closure plan? If so, — Yes__No X N/A ___RMK#

   a. Has the plan been amended in accordance with OAC rule 3745-55-12(C)? [Condition B.28.] — Yes__No__ N/A _X_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.*

CLOSURE ACTIVITIES

3. Has the permittee closed the facility? If so, — Yes__No X N/A ___RMK#

   a. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26.] — Yes__No__ N/A _X_RMK#

   b. Did the permittee carry-out the approved closure plan as set forth in the permit application and terms and conditions of the permit? [Condition B.26.] — Yes__No__ N/A _X_RMK#

   c. After receiving the final volume of hazardous waste, did the permittee remove from the facility all hazardous waste and mixed 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 _X_RMK#

   d. 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 _X_RMK#

e. Did the permittee notify Ohio EPA's Southeast District Office within five working days prior to all rinseate and soil sampling? [Condition B.32.(b)]

Yes

No

N/A
X
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 _X_RMK#

REMARKS

REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

1. Is the permittee following the procedures as specified in OAC rules 3745-54-17, 3745-55-77 and Section F of the approved application when managing ignitable, reactive and/or incompatible wastes? [Conditions B.7.(a) and C.10. and C.11.] Yes X No___ N/A ___RMK#

2. Does the permittee ***not*** store incompatible waste ***except*** in accordance with OAC rules 3745-54-17(B) and 3745-55-77, and the terms and conditions of this permit? [Condition C.11.(a)] Yes X No___ N/A ___RMK#

3. Does the permittee take precautions to prevent placing hazardous waste or mixed waste in an unwashed container that previously held an incompatible waste or material? [Condition C.11.(b)] Yes X No___ N/A ___RMK#

4. Does the permittee ensure that all containers of incompatible wastes are physically separated from other incompatible wastes or materials by a wall, berm, dike, or other device in accordance with OAC rule 3745-55-77 and the Appendix to OAC rule 3745-55-99? [Condition C.11.(c)] Yes X No___ N/A ___RMK#

   a. Are all containers of aqueous hazardous acids (ph $\leq$ 2) and caustics ph $\geq$ 12.5) sorted on different pallets and physically separated in different rooms? [Condition C.11.(c)] Yes X No___ N/A ___RMK#

   b. Are aqueous acids and caustics in poly bottles, and other containers requiring nuclear criticality safety spacing physically separated in the same room by a dike? [Condition C.11.(c)] Yes X No___ N/A ___RMK#

   c. Are containers of cyanides and sodium metals being stored in rooms physically separate from other incompatible wastes or other incompatible materials? [Condition C.11.(c)] Yes X No___ N/A ___RMK#

5. Does the permittee provide electrical grounding for all containers, tanks and transport vehicles during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(b)]

Yes
X
No

N/A

RMK
#

Does the permittee provide and require the use of spark proof tools during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(c)]

Yes X No__ N/A ___RMK#

6.

7. Does the permittee prohibit smoking and open flames in areas where hazardous wastes are managed and post appropriate signs? [Condition B.7.(d)]

Yes X No__ N/A ___RMK#

8. As required by OAC rule 3745-55-76, does the permittee store containers of ignitable or reactive wastes greater than 15 meters (50 feet) away from the Portsmouth Gaseous Diffusion Plant reservation boundary? [Condition C.10.(a)]

Yes X No__ N/A ___RMK#

REMARKS

STORAGE OF HAZARDOUS WASTES IN CONTAINERS

NOTE: *The requirements of permit 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.*

1. Is the permittee storing in containers, only those wastes as specified in Section A of the Part B permit application? [Condition C.1.(a), C.2.] Yes X No__ N/A ___RMK#

2. Does the permittee limit the total quantity of containerized waste in the container storage area to 133,000 gallons at any given time in the permitted container areas, located in building X-326 ~~and no more than 5,456,000 gallons at any given time in the permitted storage areas located in building X-7725~~? [Condition C.1.(a)] Yes X No__ N/A ___RMK#

NOTE: *For the purposes of compliance with the capacity limitation of the permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity. For example, a 55-gallon drum will be considered to be holding 55 gallons of waste, regardless of the actual quantity stored in the drum. [Condition C.1.(b)]*

3. When accumulating waste within the ~~permitted X-7725~~ and X-326 container storage area, does the permittee ensure that the total amount of waste (both > 90 days and < 90 days) does not exceed the maximum container storage inventory established under Condition C.1.? [Condition C.1.(c)] Yes X No__ N/A ___RMK#

4. Are hazardous wastes subject to regulation by the permit stored only at the designated container storage area described in the approved permit application? (See Section D of the permit application) [Condition C.1.(a)] Yes X No__ N/A ___RMK#

5. Is each container stored clearly marked to identify its contents and the date each period of accumulation/storage begins? (See Section D of the permit application) [Condition C.3.] Yes X No__ N/A ___RMK#

6. Does the permittee store hazardous waste in the types of containers described in Section D of the approved permit application? [Condition C.1.(a)] Yes X No__ N/A ___RMK#

CONDITION OF CONTAINERS

8.	Are containers holding hazardous wastes in good condition? [Condition C.3.]	Yes X No__ N/A ___RMK#
	a. If not, (e.g., severe rusting, structural defects) did the permittee transfer the hazardous waste from such a container to a container that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit and OAC rule 3745-55-71? [Condition C.3.]	Yes__No_ N/A _X__RMK#
9.	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 C.4.]	Yes X No__ N/A ___RMK#
10.	Is storage conducted in the container storage containment system as described in Condition C.1. of the permit and Section D of the approved permit application? [Condition C.5.(a)]	Yes X No__ N/A ___RMK#
11.	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 C.5.(b)]	Yes X No__ N/A ___RMK#
12.	Are lab-pack wastes handled in compliance with applicable storage requirements? [Condition C.5.(c)]	Yes X No__ N/A ___RMK#
13.	Are lab-pack wastes packaged in drums containing absorbent material that is compatible with the wastes? [Condition C.5.(d)]	Yes X No__ N/A ___RMK#

INSPECTIONS

14.	Is the permittee inspecting the container area weekly in accordance with OAC rules 3745-54-15, and 3745-54-73 and the approved inspection schedule (Section F) to detect leaking containers and deterioration of containers and the containment system? [Condition C.8.]	Yes X No__ N/A ___RMK#

a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken? [Condition C.8.]

Yes
X
No

N/A

RMK
#

b. On days when containerized waste are added or removed to and/or from any of the permitted areas for storage, does the permittee conduct inspections as described in Section F of the approved Part B permit application and maintain the inspection results in the facility operating record? [Condition C.8.]

Yes X No__ N/A __RMK#

CONTAINMENT SYSTEM

15. Does the permittee maintain the containment system as described in Section D of the approved Part B permit application, including: [Condition C.6.] — Yes X No__ N/A ___RMK#

a. Sufficient design to contain 10% of the total volume of the containers or the volume of the largest container, whichever is greater? [Condition C.6.(b)] — Yes X No__ N/A ___RMK#

b. A system which is free of gaps and sufficiently impervious to contain leaks and spills? — Yes X No__ N/A ___RMK#

c. Equipped with a coating which is compatible with each waste stored in the area? — Yes X No__ N/A ___RMK#

d. *For those wastes which are deemed incompatible with liner material:* Has the permittee installed a separate secondary containment structure within the existing structure which is equipped with a compatible liner? — Yes__No__ N/A X RMK#

16. Has the permittee had a spill or leak of wastes or an accumulation of precipitation in the containment system? If so, — Yes__No X N/A ___RMK#

a. Are spilled or leaked wastes and accumulated precipitation removed from the sump or collection area in a timely manner? [Condition C.6.(c)] — Yes__No__ N/A X RMK#

b. Does removal of spilled/leaked wastes and accumulated precipitation occur within 24 hours from the time the spill or leak waste is discovered? [Condition C.6.(c)] — Yes__No__ N/A X RMK#

REQUIRED AISLE SPACE

17. Is the permittee maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in the event of an emergency to any area of the facility as required by OAC rule 3745-54-35? [Condition B.12.] — Yes X No__ N/A ___RMK#

CLOSURE AND POST-CLOSURE

18.	At closure of the container storage area, did the permittee remove all hazardous waste, hazardous waste residues, mixed waste and mixed waste residues from the containment system, in accordance with the procedures set forth in the approved closure plan (Section I of the permit application)? [Condition C.13.(a)]	Yes__No__ N/A _X_RMK#
19.	During closure, if the permittee could not demonstrate that all contaminated soils could be removed, did the permittee close the unit and perform post-closure care following a plan approved by Ohio EPA? [Condition C.13.(b)]	Yes__No__ N/A _X_RMK#

CONTAINER STORAGE OF RESIDUAL WASTE

20.	Is the permittee complying with the provisions of Section C-2E of the application as amended pursuant to Condition B.2.(b) of this permit?	Yes_X_No__ N/A ___RMK#

LAND DISPOSAL RESTRICTION REQUIREMENTS

PROHIBITION AGAINST DILUTION

1. Has the permittee updated the annual Federal Facility Compliance Act Schedule? [OAC rule 3745-270-50; Condition B.36.] — Yes X No ___ N/A ___ RMK#

2. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [OAC rule 3745-270-40 through 49; Condition B.36.(c)] — Yes ___ No X N/A ___ RMK#

   a. As a substitute for adequate treatment to achieve compliance with LDR treatment standards? — Yes ___ No ___ N/A X RMK#

   b. To circumvent the effective date of a prohibition (e.g., to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)? — Yes ___ No ___ N/A X RMK#

   c. To otherwise avoid a prohibition in OAC rule 3745-270-30 through -39? — Yes ___ No ___ N/A X RMK#

   d. To otherwise avoid a prohibition imposed by Section 3004(d) of RCRA? — Yes ___ No ___ N/A X RMK#

NOTE: *If the answer to any of Questions 2(a) through 2(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of OAC rule 3745-270-03 [Condition B.36.]. Dilution of wastes is permissible under some conditions. See OAC rule 3745-270-03(B).*

GENERATOR REQUIREMENTS

3. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No ___ N/A ___ RMK#

   a. ***For determinations based solely on knowledge of the waste:*** Is supporting data used to make this determination being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No ___ N/A ___ RMK#

b. ***For determinations based upon analytical testing:*** Is a copy of waste analysis data being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)]

Yes
X No
N/A
RMK #
4. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g., wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No ___ N/A ___ RMK#

5. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [OAC rule 3745-270-07(A); Condition B.36.(e)] — Yes X No ___ N/A ___ RMK#

6. Does the entity generate any listed waste(s) which are restricted from land disposal? If so, — Yes X No ___ N/A ___ RMK#

a. Do such wastes also exhibit hazardous waste characteristics as identified in OAC rules 3745-51-20 to 3745-51-24? — Yes X No ___ N/A ___ RMK#

b. ***For listed wastes which also exhibit a characteristic:*** Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [OAC rule 3745-270-09(A)] — Yes X No ___ N/A ___ RMK#

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC rule 3745-270-09(B)].*

NOTIFICATION/CERTIFICATION

7. ***For wastes that do not meet treatment standards:*** Has the generator submitted a one-time written notice to the treatment/storage facility receiving the wastes, that wastes being received do not meet treatment standards? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No__ N/A ___RMK#

If so, does the notice including the following:

a. EPA hazardous waste number? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No__ N/A ___RMK#

b. Appropriate treatment standard for the waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)]

Yes X No N/A RMK #

c. The manifest number associated with the first shipment of waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No__ N/A ___RMK#

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No__ N/A ___RMK#

e. Applicable wastewater/non-wastewater category [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No__ N/A ___RMK#

f. For hazardous debris, list the contaminants subject to treatment, as described in paragraph (B) of OAC rule 3745-270-45; and an indication that these contaminants are being treated to comply with OAC rule 3745-270-45. Yes X No__ N/A ___RMK#

g. For contaminated soil list the constituents subject to treatment as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. Yes X No__ N/A ___RMK#

8. ***For wastes that meet treatment standards:*** Does the generator submit a one-time written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__No__ N/A _X_RMK#

If so, does the notice/certification including the following:

a. EPA hazardous waste identification number? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__No__ N/A _X_RMK#

b. The corresponding treatment standards and applicable prohibitions for the waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__No__ N/A _X_RMK#

c. The manifest number associated with the shipment of waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)]

Yes

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__No__ N/A _X_RMK#

No

N/A
X
RMK
#

e. Is the certification signed by the generator or an authorized representative? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__No__ N/A _X_RMK#

f. For contaminated soil list the constituents subject to treatment as described as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. — Yes__No__ N/A _X_RMK#

9. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years? [OAC rule 3745-270-07(A)(8); Condition B.36.(j)] — Yes_X_No__ N/A ___RMK#

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

NOTE: *The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate LDR wastes that do not meet treatment standards in tanks or containers. A LQG who stores LDR wastes on-site for greater than 90 days becomes a operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.*

NOTE: *The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [OAC rule 3745-270-50(E); 40 CFR 268.50(e)]*

10. Is the owner/operator storing LDR restricted wastes in containers? If so, is each container marked with the following information in accordance with OAC rule 3745-270-50(A)(2)(a) [Condition B.36(l)] — Yes X No ___ N/A ___ RMK#

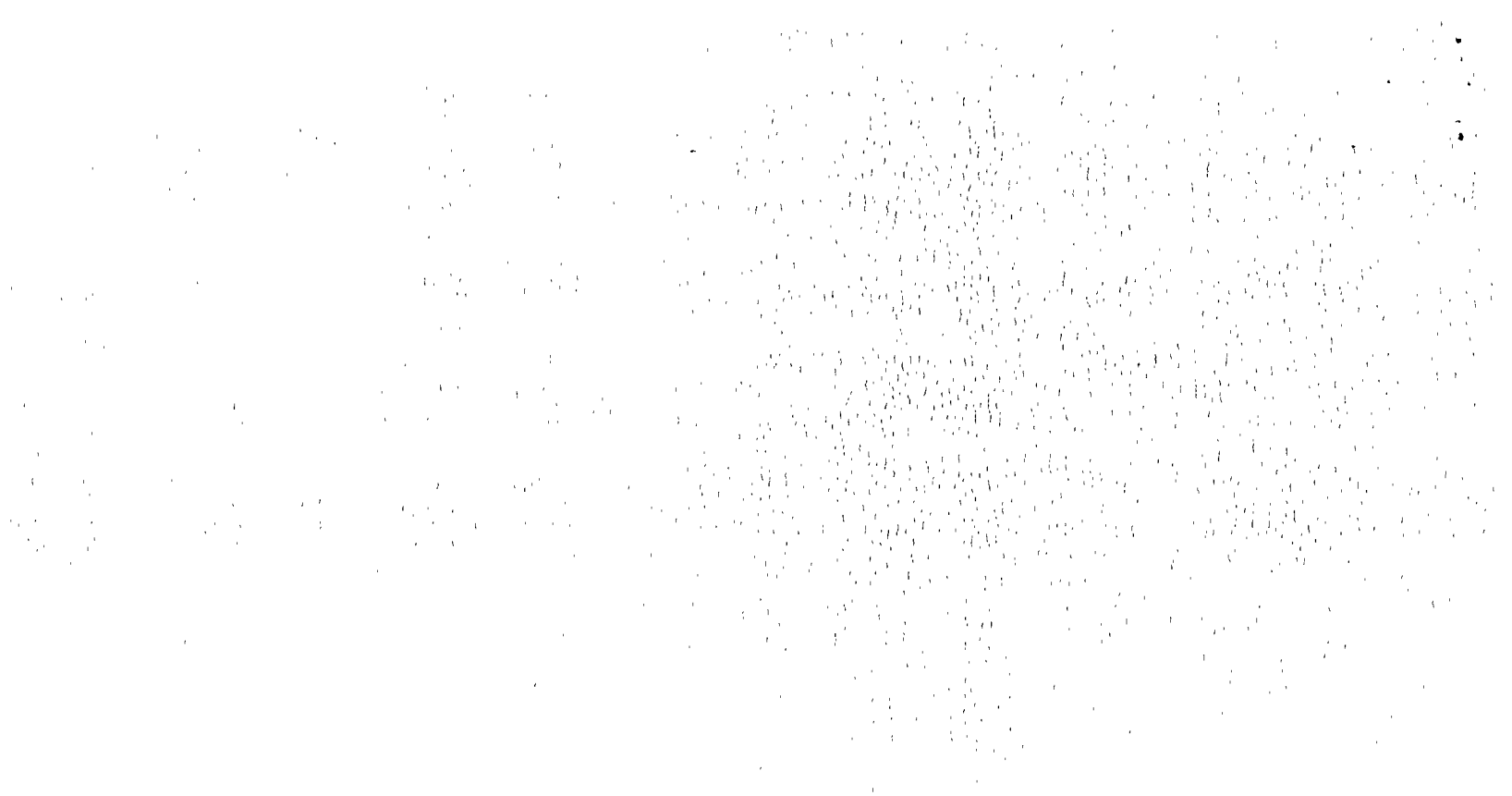
    a. The identification of the contents? — Yes X No ___ N/A ___ RMK#

    b. The date which accumulation began?

NOTE: *A TSD facility may store LDR wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [OAC rule 3745-270-50(B)]. During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.*

11. Are LDR wastes being stored at the facility for greater than one year? If so,

    a. Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [OAC rule 3745-270-50(B); Condition B.36(m)] — Yes X No ___ N/A ___ RMK#



LARGE QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

GENERAL REQUIREMENTS

1. Has the LQUWH obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)] — Yes ___ No ☐ N/A X RMK#

PROHIBITIONS

2. Did the LQUWH dispose of universal waste? [3845-273-31(A)] — Yes ☐ No X N/A ___ RMK#

3. Did the LQUWH dilute or treat universal waste, except when responding to releases or by managing specific wastes as provided in OAC 3745-273-33? [3745-273-31(B)] — Yes ☐ No ___ N/A X RMK#

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES:

4. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)] — Yes ___ No ☐ N/A X RMK#

5. If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? — Yes ___ No ☐ N/A X RMK#

6. Does the LQUWH conduct any of the following activities:

   a. Sort batteries by type? — Yes X No ___ N/A ___ RMK#

   b. Mix battery types in one container? — Yes ___ No X N/A ___ RMK#

   c. Discharge batteries to remove the electric charge? — Yes ___ No X N/A ___ RMK#

   d. Regenerate used batteries? — Yes ___ No X N/A ___ RMK#

   e. Disassemble them into individual batteries or cells? — Yes ___ No X N/A ___ RMK#

   f. Remove batteries from consumer products? — Yes X No ___ N/A ___ RMK#

   g. Remove the electrolyte from the battery? — Yes ___ No X N/A ___ RMK#

If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-33(A)(2)]

Yes ❑ No N/A X RMK# _7.

If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)]

Yes ___ No ❑ N/A X RMK#

a. If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)]

Yes ___ No ❑ N/A X RMK#

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)]

Yes ___ No ❑ N/A X RMK#

8. Are the battery(ies) or container(s) of batteries located with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-34(A)]

Yes X No ❑ N/A ___ RMK# 2

UNIVERSAL WASTE PESTICIDES

9. Does the LQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-33(B)(1)]

Yes ___ No ❑ N/A X RMK#

10. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-33(B)(2)]

Yes ___ No ❑ N/A X RMK#

11. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 66-992, except for paragraph (C) of 3745-66-97; rule 3745-66-991 and 3745-66-992 of the OAC met? [3745-273-33(B)(3)]

Yes ___ No ❑ N/A X RMK#

12. Is pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-33(B)(4)]

Yes ___ No ❑ N/A X RMK#

13. Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)]

Yes ☐ No ☐ N/A X RMK#

Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)]

Yes ___ No ☐ N/A X RMK#

14.

UNIVERSAL WASTE THERMOSTATS

15. Are thermostats that show evidence of leakage, spillage or damage that could cause leaks, properly contained? [3745-273-33(C)(1)] Yes ___ No ❑ N/A _X_ RMK#

16. If the thermostats are contained, are the containers closed, structurally sound, compatible with contents of the thermostats and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(C)(1)] Yes ___ No ❑ N/A _X_ RMK#

17. If the mercury-containing ampules are removed, does the LQUWH: [3745-273-33(C)(1)]

a. Remove the ampules in a manner to prevent breakage and is the removal done over a containment device? [3745-273-33(C)(2)(a)(b)] Yes ___ No ❑ N/A _X_ RMK#

b. Have a clean-up system readily available to transfer spilled material to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-33(C)(2)(c)(d)] Yes ___ No ❑ N/A _X_ RMK#

c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-33(C)(2)(e)] Yes ___ No ❑ N/A _X_ RMK#

d. Ensure employees are thoroughly familiar with proper waste handling and emergency procedures? [3745-273-33(C)(2)(f)] Yes ___ No ❑ N/A _X_ RMK#

e. Ensure removed ampules are stored in closed, non-leaking containers that are in good condition? [3734-273-33(C)(2)(g)] Yes ___ No ❑ N/A _X_ RMK#

f. Pack removed ampules in containers with packing material to prevent breaking during storage, handling and transportation? [3745-273-33(C)(2)(h)]

Yes ☐ No ☐ N/A X RMK#

If mercury or clean-up residues resulting from spills or leaks or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-33(C)(3)(a)]

Yes ___ No ☐ N/A X RMK#

18.

a. If the waste is characteristic, was it managed in compliance with 3745-50 through 3745-69? (*The handler is considered the generator of the mercury, residues, and/or other waste and is subject to Chapter 3745-52)* [3745-273-33(C)(3)(b)]

Yes ___ No ☐ N/A X RMK#

b. If the mercury, residues and/or other waste are not hazardous, are they managed in compliance with applicable law? [3745-273-33(C)(3)(c)]

Yes ___ No ☐ N/A X RMK#

19. Are the thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)" [3745-273-34]

Yes ___ No ☐ N/A X RMK#

ACCUMULATION TIME

20. Is the waste accumulated for less than one year? [3745-273-35(A)]

Yes X No ___ N/A ___ RMK#

a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on handler to demonstrate) [3745-273-35(B)]

Yes ___ No ☐ N/A X RMK#

NOTE: Accumulation is defined as date generated or date received from another handler.

21. Has the length of time the universal waste has been accumulated documented by ***one*** of the following: [3745-273-35(C)]

Yes X No ❑ N/A ___ RMK#

a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-35(C)(1)]

Yes X No _ N/A ___ RMK# 3

b. Marking or labeling the individual item of universal waste with the date that it became a waste or was received? [3745-273-35(C)(2)]

Yes ___ No X N/A ___ RMK#

c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-35(C)(3)]

Yes
No
X
N/A

RMK
#

d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-35(C)(4)]

Yes ___ No X N/A ___ RMK#

e. Placing the universal waste in a specific accumulation area and identifying the earliest that any universal waste in the area became a waste or was received? [3745-273-35(C)(5]

Yes ___ No X N/A ___ RMK#

f. Any other method which clearly demonstrates the length of time the universal waste has been accumulated from the date it became a waste or is received? [3745-273-35(C)(6)]

Yes ___ No X N/A ___ RMK#

EMPLOYEE TRAINING

22. Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36]

Yes X No ❑ N/A ___ RMK#

RESPONSE TO RELEASES

23. Were releases of universal waste and other residues immediately contained? [3745-273-37(A)] — Yes ___ No ❑ N/A _X_ RMK#

24. Was the released material characterized? [3745-273-37(B)] — Yes ___ No ❑ N/A _X_ RMK#

25. If the released material was a hazardous waste, was It managed as required in OAC 3745-50 through 3745-69? *(If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52)* [3745-273-37(C)] — Yes ___ No ❑ N/A _X_ RMK#

OFF-SITE SHIPMENTS

NOTE: If a LQUWH self-transports wastes, then the handler must comply with the Universal Waste transporter requirements.

26. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)] — Yes _X_ No ❑ N/A ___ RMK#

NOTE: LQUWHs are prohibited to send waste to any other facility.

27. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-38(C)] — Yes X No ❑ N/A ___ RMK#

28. Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)] — Yes X No ❑ N/A ___ RMK#

29. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do <u>one of the following</u>: — Yes ___ No ❑ N/A X RMK#

a. Receive the waste back? [3745-273-38(E)(1)] — Yes___ No___ N/A X RMK#

b. Agree to where shipment will be sent? [3745-273-38(E)(2)] — Yes___ No___ N/A X RMK#

30. If a handler rejects a partial or full load from another handler, does the receiver handler contact the originating handler and discuss <u>one of the following</u>: — Yes ___ No ❑ N/A X RMK#

a. Sending the waste back to originating handler? [3745-273-38(F)(1)] — Yes___ No___ N/A X RMK#

b. Sending the shipment to a destination facility? [3745-273-38(F)(2)] — Yes___ No___ N/A X RMK#

31. If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)] — Yes ___ No ❑ N/A X RMK#

32. If the handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-38(H)] — Yes ___ No ❑ N/A X RMK#

TRACKING UNIVERSAL WASTE SHIPMENTS

33. Are universal waste received from another handler? If so: Yes__ No X N/A __ RMK#

a. Is a record of each shipment kept? [3745-273-39(A)] Yes __ No ❑ N/A X RMK#

NOTE: This record can be in the form of a log, invoice, manifest, bill of lading, or other shipping document. This also applies to question No. 35(a).

34. Does the record include the following:

a. Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)] Yes __ No ❑ N/A X RMK#

b. Quantity of each type of universal waste? [3745-273-39(A)(2)] Yes __ No ❑ N/A X RMK#

c. Date received? [3745-273-39(A)(3)] Yes __ No ❑ N/A X RMK#

35. Is universal waste shipped to another handler? If so: Yes__ No__ N/A X RMK#

a. Is a record of each shipment kept? [3745-273-39(B)] Yes __ No ❑ N/A X RMK#

36. Does the record include the following?

a. Name and address of universal waste handler, destination facility, or foreign destination? [3745-273-39(B)(1)] Yes __ No ❑ N/A X RMK#

b. Quantity of each type of universal waste? [3745-273-39(B)(2)] Yes __ No ❑ N/A X RMK#

c. Date shipped? [3745-273-39(B)(3)] Yes __ No ❑ N/A X RMK#

37. Are records kept for three years? [3745-273-39(C)(1)(2)] Yes X No ❑ N/A __ RMK#

EXPORTS

38. Is waste being sent to a foreign destination? If so: Yes __ No X N/A __ RMK#

a. Does the large quantity handler comply with primary exporter requirements in OAC rules 3745-52-53 and 3745-52-57, and paragraphs (A)(1) - (A)(6) and (B) of 3745-52-56? [3745-273-40(A)] Yes __ No ❑ N/A X RMK#

Waste, Pesticides and Toxics Division

Type of Document: ☐ Notice of Violation and Inspection Report/Checklist
☐ No Violation Letter and Inspection Report/Checklist
☒ Letter of Acknowledgment
☐ Information Request
☐ Pre-Filing and Opportunity to Confer
☐ State Notification of Enforcement Action

Facility Name : Portsmouth Gaseous Diffusion Plant

Facility Location: 3930 U.S. Route 23 South

City: Piketon **State: Ohio**

U.S. EPA ID# OH7 890 008 983

Assigned Staff W. Francis **Phone: 312-353-4921**

Name	Signature	Date
Author W. Francis	W. [signature]	9/4/07
Regional Counsel	----------	
Section Chief P. Little	[signature]	9-5-07
Branch Chief	----------	

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
   Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 0 6 2007

REPLY TO THE ATTENTION OF LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William E. Murphie
Manager
Portsmouth/Paducah Project Office
U.S. Department of Energy
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

Mr. Paul Kreitz
Project Manager
LATA/Parallax Portsmouth, LLC
P.O. Box 855
Piketon, Ohio 45661

Re: Letter of Acknowledgment
RCRA Compliance Evaluation Inspection
Portsmouth Gaseous Diffusion Plant
Piketon, Ohio
OH7 890 008 983

Dear Messrs. Murphie and Kreitz:

On June 14, 2007, the United States Environmental Protection Agency (U.S. EPA) issued the U.S. Department of Energy (DOE) and LATA/Parallax a Notice of Violation (NOV) which identified a violation of the Ohio Administrative Code and a Resource Conservation and Recovery Act (RCRA) Permit violation at the Piketon, Ohio facility.

U.S. EPA received July 17, 2007, response letters from U.S. DOE and LATA/Parallax to the June 14, 2007, NOV.

This letter is to inform you that U.S. EPA has reviewed your responses and determined that additional enforcement action need not be taken at this time.

It is our understanding that Uranium Disposition Services (UDS) will request their own U.S. EPA ID number, will have a contingency plan in place that complies with the generator requirements, and will utilize United States Enrichment Corporation for response to emergencies at UDS.

This position does not limit your liability for compliance with all the applicable provisions of the Resource Conservation and Recovery Act, as amended. Your hazardous waste management

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

operations will continue to be evaluated by U.S. EPA and the Ohio Environmental Protection Agency (OEPA) in the future.

If you have any questions regarding this letter, please contact Walt Francis of my staff at (312) 353-4921.

Sincerely yours,

Paul Little, Chief
Compliance Section #2
RCRA Branch
Land and Chemicals Division

cc: Melody Stewart, OEPA-Southeast District Office

Waste, Pesticides and Toxics Division

Type of Document:
- ☒ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action

Facility Name : Portsmouth Gaseous Diffusion Plant

Facility Location: 3930 US Route 23 South

City: Piketon **State: Ohio**

U.S. EPA ID# OH7 890 008 983

Assigned Staff W. Francis **Phone: 312-353-4921**

Name	Signature	Date
Author **W. Francis**	W.	4/23/07
Regional Counsel **S. Hersh**		6/7/07
Section Chief **P. Little**		6/12/07
Branch Chief **J. Boyle**	----------	

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
   Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 14 2007

REPLY TO THE ATTENTION OF DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William E. Murphie
Manager
Portsmouth/Paducah Project Office
U.S. Department of Energy
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

Ms. Gail Mattson
Manager of Projects
LATA/Parallax Portsmouth, LLC
P.O. Box 855, Bldg. X-1000
Piketon, Ohio 45661

Re: Notice of Violation
RCRA Compliance Inspection
U.S. Department of Energy
Portsmouth Gaseous Diffusion Plant
Piketon, Ohio
OH7 890 008 983

Dear Mr. Murphie and Ms. Mattson:

On June 20th through June 22nd, 2006, representatives of the United States Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) inspected the U.S. Department of Energy (U.S. DOE) Portsmouth Gaseous Diffusion Plant located near Piketon, Ohio. The purpose of the inspection was to evaluate compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection checklists for your reference.

Based on information provided by U.S. DOE, LATA/Parallax and Uranium Disposal Services (UDS) personnel, review of records, and personal observations by the inspectors, U.S. EPA finds that U.S. DOE and LATA/Parallax are in violation of the following requirements of the Hazardous Waste RCRA Permit, Ohio Administrative Code (OAC) and the United States Code of Federal Regulations (C.F.R):

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

1) A generator must retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to this rule for at least three years from the date that the waste that is the subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal. See, OAC § 3745-270-07(A)(8) and RCRA Hazardous Waste Permit Condition B.36(j).

   During the UDS records review portion of the inspection, the inspectors reviewed a 6/12/2006 hazardous waste manifest for an off-site shipment of D002 corrosive waste. The Land Disposal Restriction (LDR) form had not been sent along with the original manifest/shipment, but was sent directly to the treatment, storage, disposal (TSD) facility from a consultant in Lexington, Kentucky. UDS had utilized the RCRA ID number (OH7 890 008 983) for this off-site shipment of waste. Therefore, U.S. DOE failed to comply with OAC Rule 3745-270-07(A)(2) [40 C.F.R. § 268.7] and violated RCRA Hazardous Waste Permit Condition B.36(j).

2) The contingency plan must describe the actions facility personnel must take to comply with OAC § 3745-54-51 through OAC § 3745-54-56 [40 C.F.R. Part 264 Subpart D]. See, OAC § 3745-54-52(a) [40 C.F.R. § 264.52(a)]. An owner or operator shall note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within fifteen days after the incident, the owner or operator shall submit a written report on the incident to the director. See, OAC § 3745-54-56(J) [40 C.F.R. § 264.56(j)] and violated RCRA Hazardous Waste Permit Condition B.23.

   During the UDS records review portion of the inspection, the inspectors reviewed a UDS SPCC/Contingency Plan. The UDS SPCC/Contingency Plan did not contain information or procedures that included the required notification of the OEPA Director to be notified within 15 days after implementing the contingency plan. Therefore, U.S. DOE failed to comply with OAC § 3745-54-52(a) [40 C.F.R. § 264.52(a)] and violated RCRA Hazardous Waste Permit Condition B.23.

Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a), U.S. EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above requirements.

You should submit your response to Walt Francis, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604. In addition, please submit a copy of your response to Melody Stewart at the OEPA Southeast District Office, 2195 Front Street, Logan, Ohio 43138.

If you have any questions regarding this letter, please contact Walt Francis of my staff at (312) 353-4921.

Sincerely yours,

Paul Little, Chief
Compliance Section # 2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosures

cc: Melody Stewart, OEPA-Southeast District Office

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME:	**PORTSMOUTH GASEOUS DIFFUSION PLANT**
FACILITY U.S. EPA ID NO.:	**OH7 890 008 983**
FACILITY TYPE:	**Large Quantity Generator/Container Storage Facility**
FACILITY ADDRESS:	3930 US Route 23 South Piketon, Ohio 45661
U.S. EPA REPRESENTATIVE:	Walt Francis
DATE(S) OF INSPECTION:	June 19th through June 22nd, 2006
SIC CODE:	**2819** - Industrial Inorganic Chemicals, Not Elsewhere Classified
NAICS CODE:	**325188** - All Other Basic Inorganic Chemical Manufacturing

PREPARED BY: Walt Francis — 10/3/06

Walt Francis
Environmental Scientist
Date

ACCEPTED BY: P Little — 10-3-06

Paul Little, Chief
Compliance Section 2
Enforcement and Compliance Assurance Branch
Date

Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the U.S. Department of Energy Portsmouth Gaseous Diffusion Plant (Portsmouth), Piketon, Ohio to determine its compliance with the Resource Conservation and Recovery Act (RCRA) and the Ohio Administrative Code (OAC), with respect to U.S. DOE's management of hazardous waste, universal waste and used oil, as part of a U.S. EPA, Region 5 multi-media inspection.

Participants

U.S. EPA Inspector -
Walt Francis, Environmental Scientist

OEPA Inspector -
Melody Stewart, Hazardous Waste Inspector

Representatives of U.S. DOE, Theta/Pro2Serve Management Company (TPMC), LATA/Parallax, and Uranium Disposal Services (UDS) -
Melda Rafferty, U.S. DOE
Bob Anderson, TPMC
Cliff Beeks, LATA/Parallax
Rosemary Richmond, LATA/Parallax
Evelyn Hayes, UDS
Steve Gertz, UDS
Tom Marshall, UDS

Site Description/Background Information

Historically, the main function of the Portsmouth facility was to enrich uranium for military use (nuclear submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in uranium hexafluoride (UF6) feedstock which contains 0.711% U235. The Plant had produced enriched uranium continuously since September 1954. In 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). U.S. DOE retained ownership of the ongoing site environmental restoration program as well as two permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and are leased by USEC. These include decontamination of equipment and uranium recovery (X-705 Bldg.); chemical cleaning of equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); photo and printing lab (X-100); vehicle repair (X-750); coal pile

runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in U.S. DOE owned and permitted storage facilities. Waste generated by U.S. DOE and LATA/Parallax from the environmental restoration is also stored in these facilities. USEC also generates non mixed radioactive hazardous waste which is shipped out of Building XT-847. USEC ceased the enrichment process in May 2001.

Uranium contaminated hazardous wastes (mixed waste) which were/are generated by USEC and U.S. DOE are stored on-site in U.S. DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of TSDs in the U.S. which could accept mixed waste, and a May 1991 U.S. DOE moratorium on off-site waste shipment. A large percentage of the waste generated at Portsmouth is U.S. DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in U.S. DOE-owned storage areas. During the past year, numerous shipments of hazardous waste were manifested off-site by both U.S. DOE and USEC. This is due to an increase in treatment capacity at off-site commercial treatment facilities and U.S. DOE treatment facilities, the lifting of the moratorium, and the execution of the site treatment plans for U.S. DOE and USEC. U.S. DOE sends some waste off-site (to U.S. DOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to U.S. DOE - Portsmouth for storage in the interim prior to their final disposal.

U.S. DOE/LATA Parallax generated hazardous wastes are primarily shipped to Envirocare of Utah, Inc., Clive, Utah. In addition, a wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes. UDS is working on a project to recover material from depleted uranium hexafluoride cylinders.

Opening Conference

On June 19, 2006, U.S. EPA representatives conducted an overview of the multi-media inspection in Building X-1000 with representatives from U.S. DOE, LATA/Parallax, TPMC, UDS, USEC, USEC Centrifuge, Inc. and OEPA representatives. Ms. Melda Rafferty provided an overview of the Portsmouth Gaseous Diffusion Plant. Walt Francis arrived at the meeting at approximately 10:00 a.m. The inspection team was provided a general site tour which included: Buildings X-770, X-710, X-300, X-720, X-105, X-744G, X-623, X-344, UDS Building under construction, X-7725, Lithium Storage Buildings, Water Treatment Plant, X-735, Lime Sludge Beds/Prairie Restoration Area; X-746, X-744 J & H; X-749 and Building X-7725 Centrifuge Pilot Project.

Walt Francis and Melody Stewart informed the U.S. DOE and LATA/Parallax representatives of the nature, scope, and procedures of the RCRA portion of the inspection. The inspection was conducted by U.S. EPA and OEPA personnel as a Federal lead inspection. The facility representatives provided the team with a brief update of the facility since the last inspection. Ms. Rosemary Richmond allowed the inspectors access to the facility to conduct the inspection.

Site Tour

On June 21, 2006, the walk-through began in Building X-627 where U.S. DOE maintains a 55-gallon satellite accumulation container for waste TCE. The walk-through continued in Building X-623 where U.S. DOE maintains a less than 90 day area and a satellite accumulation area for waste TCE. No containers were observed in the less than 90 day accumulation area. The walk-through continued at Building X-700 where we observed an area utilized for accumulating universal waste such as used fluorescent lamps, and waste batteries and two SAAs for used solvent rags and used aerosol cans. The walk-through continued at Building X-622 where U.S. DOE maintains an SAA area for F001 personal protective equipment (PPE), waste plastic, and filters. The walk-through continued at Building X-624 where U.S. DOE maintains an SAA area for waste TCE such as used PPE and bag filters. The walk-through continued at Building X-333, DMSA 13, Column Ux 48, where U.S. DOE maintains one 55-gallon SAA container. In Building X-330 the inspectors observed another SAA container. The walk-through continued at Building X-326 where U.S. DOE maintains an SAA at DMSA, Column F2, and the Permitted "L Cage Area." In the L Cage, the inspectors walked around the containers in storage. In row #24, Inspector Francis observed a plastic bag and label that had fallen off of a container, due to the plastic bag deteriorating. The walk-through continued at Building X-7725, where U.S. DOE maintains areas for hazardous waste storage, and we met Mr. Charles Bearhs. Mr. Bearhs took the inspectors to Areas L, H, G, Q, P, P-1, N-1, 4A, B, and an area on the first floor for accumulating universal waste (used fluorescent lamps, mercury thermostats, and used batteries).

The walk-through continued at the UDS offices, where the inspectors met Evelyn Hayes, Steve Gertz and Tom Marshall. Ms. Hayes provided an overview of the UDS construction activities and future plans for recovery of depleted uranium at the Portsmouth site. Ms. Hayes also provided a copy of a hazardous waste manifest, training records for UDS personnel and a copy of the UDS Portsmouth Spill Prevention Control and Countermeasures Plan.

The inspectors then returned to Building X-1000 to review records.

On June 22, 2006, the inspectors returned to the UDS office for a safety briefing and tour of the depleted UF6 cylinder yards with Evelyn Hayes and Tom Marshall. The walk-through included Yards E, C, and G.

Records Review

A record review was conducted. The inspection team requested to review hazardous waste manifests, land disposal restriction forms, mixed-waste shipment documentation, universal waste and used oil shipping records, personnel training information, weekly inspection logs, waste profiles for hazardous waste in storage, and the latest version of the contingency plan. The inspectors reviewed hazardous waste manifests since the date of the last inspection, personnel training records, waste profiles, and weekly inspection logs. The inspectors reviewed a

Contingency Plan that was last updated in February 2006.

Closing Conference

The inspectors conducted a closing conference on June 22, 2006. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. Kevin Vuillemeir explained that the RCRA report would be incorporated into the U.S. EPA, Region 5 multi-media inspection report. U.S. DOE and LATA/Parallax would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, and completed inspection checklists. Inspector Francis noted that during the records review portion of the inspection, the inspectors reviewed a 6/12/06 hazardous waste manifest for an off-site shipment of D002 corrosive waste from the UDS area. The Land Disposal Restriction Form had not been sent along with the manifest, but was sent directly to the TSD from a consultant in Lexington, Kentucky. Also, the UDS SPCC/Contingency Plan did not include the required text for the OEPA Director to be notified within 15 days after implementing the contingency plan.

Attachments

Inspection Checklists.

STATE PART B HAZARDOUS WASTE PERMIT INSPECTION CHECKLIST

DIVISION OF HAZARDOUS WASTE MANAGEMENT
OHIO EPA
June 2006

Table of Contents
U.S. DOE - Portsmouth Gaseous Diffusion Plant
04-66-0680

RCRA Inspection Checklist 1

General Conditions of Permit 2
- General Permit Compliance and Activities 2

Permit Modification, Revision, Revocation 5

Site Entry - Availability of Records 7

Recordkeeping Requirements 7
- Confidentiality 7
- Operating Record 7
- Annual Report Requirement 9
- Sampling/monitoring Recordkeeping Requirements 9
- Waste Minimization Requirements 10

Off-site Shipments/manifest Requirements 11
- Manifest Requirements/wastes Received On-site 11

Waste Analysis/waste Analysis Plan 11
- General Requirements 12
- Waste Analysis Quality Assurance Requirements 12

General Inspection Requirements 14

Security Provisions/facility Operation 15

Personnel Training 16

Required Equipment 16

Contingency Plan Requirements 17
- Emergency Procedures 17
- Emergency Authorities 18
- Emergency Coordinator 18
- Amendment of Plan 18
- Implementation of Plan 19

Contingency Plan Requirements 20
- Closure Plan/amendment 20
- Closure Activities 20

Requirements for Ignitable, Reactive or Incompatible Wastes 22

Storage of Hazardous Wastes in Containers 24
- Condition of Containers 25
- Inspections 25
- Containment System 26
- Required Aisle Space 27
- Closure and Post-closure 27
- Container Storage of Residual Waste 27

Land Disposal Restriction Requirements 28
- Prohibition Against Dilution 28
- Generator Requirements 28
- Notification/certification 29
- Storage of Land Disposal Restricted Wastes 31

OHIO PART B PERMITTED FACILITY
RCRA INSPECTION CHECKLIST

Facility: Portsmouth Gaseous Diffusion Plant Ohio Permit #: 04-66-0680

Co-operator: LATA/Parallax Portsmouth, LLC

Address: 3930 U.S. Route 23 South
Piketon, OH 45661

USEPA ID#: OH7 890 008 983
Facility Phone: 740-897-5010

County: Pike Time: 8:00 -

Inspection Date: ~~6/15/06 6/22/06~~ 6/15/06 – 6/22/06

Advance notice of inspection given? X (Yes) ___ (No)
If so, how far in advance? _____

	Name	Agency/Title	Phone
Inspector(s):	Walt Francis	U.S. EPA	312-353-4921
	Melody Stewart	Ohio EPA	740-380-5256
Facility Representative(s):	Melda Rafferty	U.S. DOE	740-897-5010
	Rosemary Richmond	LPP	740-897-5010

Is facility operating as a generator? Yes X No _____

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

PERMIT STATUS

Permit Issued: March 15, 2001
Permit Effective Date: March 15, 2001
Permit Expiration Date: March 15, 2006

STORAGE		TREATMENT		DISPOSAL	
X	Container		Tank		Injection Well
	Tank		Surface Impoundment		Landfill
	Waste Pile		Incinerator		Land Application
	Surface Impoundment		Thermal Treatment		Surface Impoundment

GENERAL CONDITIONS OF PERMIT

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1. Has the expiration date of the permit passed? If so: Yes___No_X_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 _X_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? (Or upon a later date if the permittee can demonstrate good cause for late submittal.) [Condition A.6.(a)] Yes___No___ N/A _X_RMK#___

NOTE: *The permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:*

   A. The permittee has submitted a timely and complete application for a renewal permit under OAC rule 3745-50-40; and

   B. Through no fault of the permittee, a new permit has not been issued pursuant to OAC rule 3745-50-40 on or before the expiration date of the permit. [Condition A.6.(b)]

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.26] Yes_X_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? [Condition A.1.(b) and A.5] Yes___No_X_ N/A ___RMK#___

4. Have any provisions of the permit been identified as invalid? [Condition A.4.] Yes___No_X_ N/A ___RMK#___

5. Has the facility identified any instances of noncompliance with the permit, RC Chapter 3734. or the rules adopted thereunder, which may endanger human health or the environment? If so: Yes___No_X_ N/A ___RMK#___

   a. Did the facility immediately report orally the following to Ohio EPA's Emergency Response Section within 24 hours of becoming aware of the circumstance(s): [Condition A.20.(a)]

i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and — Yes__No__ N/A _X_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 or operator? — Yes__No__ N/A _X_RMK#__

B. Name, address and telephone number of the facility? — Yes__No__ N/A _X_RMK#__

C. Name and quantity of material(s) involved? — Yes__No__ N/A _X_RMK#__

D. The extent of injuries, if any? — Yes__No__ N/A _X_RMK#__

E. An assessment of the actual or potential hazard to the environment and human health outside the facility where this is applicable? — Yes__No__ N/A _X_RMK#__

F. Estimated quantity and disposition of recovered material that resulted from the incident? — Yes__No__ N/A _X_RMK#__

6. Did the permittee provide a written report to Ohio EPA's Emergency Response Section and DHWM, SEDO within five days of the time the permittee became aware of the circumstances reported in Question 5? [Condition A.21.] If so did the report contain: — Yes__No__ N/A _X_RMK#__

a. A description of the noncompliance and its cause (including exact dates and times)? — Yes__No__ N/A _X_RMK#__

b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? — Yes__No__ N/A _X_RMK#__

c. Steps taken or planned to minimize the impact on human health and the environment and to reduce and prevent recurrence of the noncompliance? — Yes__No__ N/A _X_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 becomes aware of the circumstances. [Condition A.21.(c)]*

7. Has the permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8] — Yes__No__ N/A _X_RMK#__

8. Has the permittee identified any other instances of noncompliance not provided for in Question 5? — Yes__No__ N/A _X_RMK#__

   a. If so, did the permittee report to the director within a month of the time at which the permittee is aware of such noncompliance? [Condition A.22.] — Yes__No__ N/A _X_RMK#__

   b. Do the reports provided contain the information set forth in Condition A.20? — Yes__No__ N/A _X_RMK#__

9. Has the permittee planned any physical alterations or additions to the permitted facility? — Yes__No X_ N/A ___RMK#__

   a. If so, has the facility provided Ohio EPA with notice of such changes? [Condition A.15] — Yes__No__ N/A _X_RMK#__

Note: *Such notification does not waive the permittee's duty to comply with the permit pursuant to Condition A.5.*

REMARKS

PERMIT MODIFICATION, REVISION, REVOCATION

1. Has the permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.] — Yes X No___ N/A ___RMK#___

2. Has the permit been transferred to a new owner or operator? [Condition A.18.] If so, co-operator LPP. — Yes (X) No___ N/A ___RMK#___

   a. Has the transfer been conducted in accordance with R.C. Chapter 3734. and the rules adopted thereunder? [Condition A.18.]; and — Yes___No___ N/A X RMK#___

   b. Before transferring ownership did the permittee notify the new owner in writing of the requirements of R.C. Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.18.] — Yes___No___ N/A X RMK#___

3. Has the permittee submitted reports of compliance or noncompliance with, or any progress reports on the requirements contained 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 X RMK#___

4. Has the permittee furnished relevant information which Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, or to determine compliance with the permit? [Condition A.10] — Yes X No___ N/A ___RMK#___

5. Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10] — Yes X No___ N/A ___RMK#___

6. 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 HWFB? If so, — Yes___No X N/A ___RMK#___

   a. Has the permittee promptly submitted such facts or corrected information to the appropriate entity? [Condition A.24.] — Yes___No___ N/A X RMK#___

7.	Is the permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications to the application? [Condition A.14.(c)]	Yes_X_No___ N/A ___RMK#___
8.	Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14.(c)]	Yes_X_No___ N/A ___RMK#___

REMARKS

SITE ENTRY - AVAILABILITY OF RECORDS

1. As specified in Condition A.11., has the permittee allowed the director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection, 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 X No ___ N/A ___ RMK#___

   b. Have access to and copy any records required to be kept under the conditions of the permit? — Yes X No ___ N/A ___ RMK#___

   c. Inspect at reasonable times facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit? — Yes X No ___ N/A ___ RMK#___

   d. Sample, document, or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by R.C. Chapter 3734. and the rules adopted thereunder? — Yes X No ___ N/A ___ RMK#___

RECORDKEEPING REQUIREMENTS

CONFIDENTIALITY

1. Has the permittee requested confidentiality of any information of the permit in accordance with R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.25.] — Yes ___ No X N/A ___ RMK#___

OPERATING RECORD

2. Is the permittee maintaining a written operating record at the facility as set forth in OAC rule 3745-54-73 and Condition B.22. of the permit which contains the following elements:

   a. A description and the quantity of each hazardous waste received? — Yes X No ___ N/A ___ RMK#___

   b. Method(s) and date(s) of treatment, storage or disposal at the facility? — Yes X No ___ N/A ___ RMK#___

c. The location of each hazardous waste within the facility and the quantity at each location? Yes X No___ N/A ___RMK#___

3. Is the permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents as part of its operating record: [Condition A.28.]

a. Waste analysis plan in accordance with OAC rule 3745-54-13 and the conditions of the permit? Yes X No___ N/A ___RMK#___

b. Contingency plan in accordance with OAC rule 3745-54-53 and the conditions of the permit? Yes X No___ N/A ___RMK#___

c. Closure plan in accordance with OAC rule 3745-55-12 and the conditions of the permit? Yes X No___ N/A ___RMK#___

d. Personnel training plan and records required by OAC rule 3745-54-16 and the conditions of the permit? Yes X No___ N/A ___RMK#___

e. Inspection schedules developed in accordance with OAC rules 3745-54-15 and 3745-55-74 and the conditions of the permit? Yes X No___ N/A ___RMK#___

4. Have any of the documents identified in Question #3 been revised as required by the permit? If so, Yes X No___ N/A ___RMK#___

a. Has the permittee submitted the revisions to Ohio EPA? [Condition A.28.(b)] Yes X No___ N/A ___RMK#___

b. Has the permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.28.(b)] Yes X No___ N/A ___RMK#___

5. Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from the date of inspection? [Condition A.28.(c)] Yes X No___ N/A ___RMK#___

ANNUAL REPORT REQUIREMENT

6. 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 and the conditions of the permit? [Condition B.25.] Yes X No___ N/A ___RMK#___

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

7. In compliance with Condition A.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 X No___ N/A ___RMK#___

   b. Individual(s) who performed the sampling or measurement? Yes X No___ N/A ___RMK#___

   c. Date(s) analyses were performed? Yes X No___ N/A ___RMK#___

   d. Individual(s) who performed the analyses? Yes X No___ N/A ___RMK#___

   e. Analytical technique(s) or method(s) used? Yes X No___ N/A ___RMK#___

   f. Results of such analyses? Yes X No___ N/A ___RMK#___

8. 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 A.12.(a)] Yes X No___ N/A ___RMK#___

9. Has Ohio EPA requested submittal of any reports or other information required by the conditions of the permit from the permittee? If so, Yes___No X N/A ___RMK#___

   a. Have the submittals been signed and certified according to OAC rules 3745-50-58(K) and 3745-50-42? [Condition A.13.] Yes___No___ N/A X RMK#___

WASTE MINIMIZATION REQUIREMENTS

10. Has the permittee submitted a Waste Minimization Report to Ohio EPA meeting the requirements of Condition A.29. of the permit within 180 days of permit journalization? Yes_X_No___ N/A ___RMK#___

    a. Following the first submittal as identified above in Question #10, has the permittee submitted biennial updates to this report as required by Condition A.29.(c)? Yes_X_No___ N/A ___RMK#___

REMARKS

OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS

1. Is all hazardous and mixed waste transported from the facility by a properly registered transporter of hazardous and mixed waste in accordance with all applicable laws, rules and standards? [Condition A.16.] — Yes X No___ N/A ___RMK#___

MANIFEST REQUIREMENTS/WASTES RECEIVED ON-SITE

2. Upon receipt of the manifests, has the permittee signed and dated each copy of the manifest? [OAC 3745-54-71(A)(1); Condition B.24.] — Yes X No___ N/A ___RMK#___

3. For any significant discrepancies identified upon receipt of the manifest(s): did the permittee note such discrepancies on the manifest(s) in accordance with OAC rule 3745-54-71(A)(2) and Condition B.24? — Yes___No___ N/A X RMK#___

   a. Did the permittee attempt to reconcile the discrepancy? [Condition B.24.] — Yes___No___ N/A X RMK#___

   b. If the discrepancy was not resolved within 15 days: did the permittee submit a report, including a copy of the manifest, to the director in accordance with OAC rule 3745-54-72(B)? [Condition B.24.] — Yes___No___ N/A X RMK#___

4. Does the permittee immediately give the transporter at least one copy of the signed manifest? [OAC 3745-54-71(A)(3); Condition B.24.] — Yes X No___ N/A ___RMK#___

5. Does the permittee provide the generator with a copy of the manifest within 30 days of receipt of waste on-site? [OAC 3745-54-71(A)(4); Condition B.24.] — Yes X No___ N/A ___RMK#___

6. Does the permittee retain a copy of each manifest on-site for at least three years from the date of delivery? [OAC 3745-54-71(A)(5); Condition B.24.] — Yes X No___ N/A ___RMK#___

7. Has the permittee received any hazardous waste or mixed waste from off-site, other than as described in Condition B.2(b)? — Yes___No X N/A ___RMK#___

WASTE ANALYSIS/WASTE ANALYSIS PLAN

GENERAL REQUIREMENTS

1. Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information which is necessary to properly treat, store or dispose of the waste in accordance with OAC Chapters 3745-54 to 3745-57 and Condition B.3 of the permit (Section C of the approved permit application)? [OAC 3745-54-13(A)(1)] — Yes X No ___ N/A ___ RMK#___

2. Since the last inspection, were any wastes generated by the facility which were unable to be characterized through process knowledge? If so, — Yes ___ No X N/A ___ RMK#___

   a. Were the waste analysis procedures described in Section C of the approved permit application followed? — Yes ___ No ___ N/A X RMK#___

3. Is the permittee following the procedures described in the approved waste analysis plan (Section C of approved permit application) and the requirements of OAC rule 3745-54-13? [Condition B.3.] — Yes X No ___ N/A ___ RMK#___

4. Is the permittee maintaining waste analysis data in the facility's operating record as required by OAC rule 3745-54-73 and Condition B.22. of the permit? — Yes X No ___ N/A ___ RMK#___

WASTE ANALYSIS QUALITY ASSURANCE REQUIREMENTS

5. Is the permittee verifying the analysis of each waste stream annually as part of its quality assurance program in accordance with SW-846? [Condition B.3.] — Yes X No ___ N/A ___ RMK#_

6. In accordance with Condition B.3. of the permit, does the permittee's quality assurance plan ensure that the permittee is, at a minimum:

   a. Maintaining property functional instruments? — Yes X No ___ N/A ___ RMK#___

   b. Using approved sampling/analytical methods? — Yes X No ___ N/A ___ RMK#___

   c. Verifying the validity of sampling and analytical procedures and performance of correct calculations? — Yes X No ___ N/A ___ RMK#___

7. If the permittee uses a contract laboratory to perform analyses, did the permittee inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this permit? Yes_X_No___ N/A ___RMK#___

REMARKS

GENERAL INSPECTION REQUIREMENTS

1.	Is the permittee following the inspection procedures and schedules described in Section F of the approved permit application and the requirements of OAC rule 3745-54-15? [Condition B.5.]	Yes X No ~~X~~ N/A ___RMK# 1
2.	Does the permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [OAC 3745-54-15(A)(1)(2)]	Yes X No___ N/A ___RMK#___
3.	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?	Yes X No___ N/A ___RMK#___
	a. Is the schedule kept at the facility? [OAC 3745-54-15(B)(2)]	Yes X No___ N/A ___RMK#___
	b. Does the schedule identify the types of problems which are to be looked for during the inspection? [OAC 3745-54-15(B)(3)]	Yes X No___ N/A ___RMK#___
	c. Does the schedule include inspection of areas subject to spills daily when in use and according to other applicable regulations when not in use? [OAC 3745-54-15(B)(4)]	Yes X No___ N/A ___RMK#___
4.	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 X No___ N/A ___RMK#___
5.	Is the permittee maintaining records of inspections for a minimum of three years? [Condition B.5.]	Yes X No___ N/A ___RMK#___
6.	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 X No___ N/A ___RMK#___
	b. Signature of inspector?	Yes X No___ N/A ___RMK#___
	c. Notation of observations made?	Yes X No___ N/A ___RMK#___

d. Date/nature of any repairs or other remedial actions? Yes X No___ N/A ___RMK#___

SECURITY PROVISIONS/FACILITY OPERATION

1. Is the permittee complying with the security provisions of OAC rule 3745-54-14(B)(1) and B(2) and (C) and Section F of the approved permit application, including the following: [Condition B.4.]

   a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility; Yes X No___ N/A ___RMK#___

   b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility; or Yes X 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 X No___ N/A ___RMK#___

2. In accordance with OAC rule 3445-54-14(C), does the permittee have signs reading "Danger-Unauthorized Personnel Keep Out" posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? [Condition B.4.] Yes X No___ N/A ___RMK#___

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 waters? [Condition B.1.] Yes X No___ N/A ___RMK#___

REMARKS

RMK#1 [redacted] inspections.

PERSONNEL TRAINING

1. Is the facility conducting personnel training in accordance with Section H of the approved permit application and the following requirements of OAC rule 3745-54-16: [Condition B.6.]

   a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC 3745-54-16(A)(B)(C)] — Yes X 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 3745-54-16(B)? — Yes X No___ N/A ___RMK#___

   c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(B)? — Yes X No X N/A ___RMK#2

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 X No___ N/A ___RMK#___

REQUIRED EQUIPMENT

1. Is the permittee, at a minimum, maintaining the equipment set forth in the approved permit application (Section G) at the facility? [Condition B.9.] — Yes X No___ N/A ___RMK#___

2. Is the permittee inspecting, testing, and maintaining the equipment specified in Question #1 to assure its proper operation as specified in OAC rule 3745-54-33, the inspection plans and Section G of the approved permit application? [Condition B.10.] — Yes X 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 Section G of the approved permit application? [Condition B.11.] — Yes X No___ N/A ___RMK#___

CONTINGENCY PLAN REQUIREMENTS

EMERGENCY PROCEDURES

1. In compliance with Condition B.13.(a) of the permit, does the permittee:

   a. Familiarize the emergency response agencies likely to respond to an emergency at the facility with:

      i. The location and layout of the facility? Yes X No___ N/A ___RMK#___

      ii. Properties of hazardous waste and mixed waste managed at the facility and associated hazards? Yes X No___ N/A ___RMK#___

      iii. Places where facility personnel will normally be working? Yes X No___ N/A ___RMK#___

      iv. Entrances to and roads inside the facility? Yes X No___ N/A ___RMK#___

      v. Evacuation routes as depicted in Section G of the permit application? Yes X No___ N/A ___RMK#___

   b. Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the facility, and any further requirements imposed by the permit?; and Yes X No___ N/A ___RMK#___

   c. Familiarize local police and fire departments, local hospitals and other local emergency services with the properties of hazardous waste and mixed waste managed at the facility and the types of injuries which could result from fires, explosions or a release of hazardous wastes at the facility? Yes X No___ N/A ___RMK#___

2. Is the permittee in compliance with the requirements of OAC rule 3745-54-56 and Section G of the approved permit application regarding emergency procedures? [Condition B.20.] Yes X No___ N/A ___RMK#___

EMERGENCY AUTHORITIES

3. 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_X_ 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 _X_RMK#___

4. 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.] — Yes_X_No__ N/A ___RMK#___

5. Has the permittee notified the agencies in Question #4, in writing, within ten days of the effective date of any amendments or revisions to the Plan? [Condition B.18.(b)] — Yes_X_No__ N/A ___RMK#___

6. 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 in accordance with OAC rule 3745-54-53? [Condition B.18.(c)] — Yes_X_No__ N/A ___RMK#___

EMERGENCY COORDINATOR

7. Is the permittee in compliance with the requirements of OAC rule 3745-54-55 with regard to the emergency coordinator? [Condition B.19.] — Yes_X_No__ N/A ___RMK#___

AMENDMENT OF PLAN

8. Is the permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17.] — Yes_X_No__ N/A ___RMK#___

Note: *Also see Question #4 of RECORDKEEPING REQUIREMENTS to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.*

IMPLEMENTATION OF PLAN

9. Has there been a fire, explosion or release of hazardous waste or mixed waste or constituents at the facility since the last date of inspection as described by Condition B.14. of the permit? If so, — Yes__No_X_ 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? [Condition B.14.] — Yes__No__ N/A _X_RMK#___

   b. Did the permittee collect and manage released material, emergency response material and by-products as hazardous waste or mixed waste until making a demonstration to Ohio EPA that such materials are not subject to Ohio hazardous waste rules? [Condition B.16.] — Yes__No__ N/A _X_RMK#___

   c. 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 _X_RMK#___

      i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23.] ***Note:*** *See also Conditions A.21. and A.22. of the permit for additional reporting/recordkeeping requirements.* — Yes__No__ N/A _X_RMK#___

   d. 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? [Condition B.23.] — Yes__No__ N/A _X_RMK#___

REMARKS

CONTINGENCY PLAN REQUIREMENTS

CLOSURE PLAN/AMENDMENT

1. Is the permittee maintaining at the facility, the approved closure plan which contains the elements set forth in OAC rule 3745-55-12? [Condition B.29.] — Yes X No ___ N/A ___ RMK#___

2. Has the permittee amended the closure plan? If so, — Yes ___ No X N/A ___ RMK#___

   a. Has the plan been amended in accordance with OAC rule 3745-55-12(C)? [Condition B.28.] — Yes ___ No ___ N/A X 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.*

CLOSURE ACTIVITIES

3. Has the permittee closed the facility? If so, — Yes ___ No X N/A ___ RMK#___

   a. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26.] — Yes ___ No ___ N/A X RMK#___

   b. Did the permittee carry-out the approved closure plan as set forth in the permit application and terms and conditions of the permit? [Condition B.26.] — Yes ___ No ___ N/A X RMK#___

   c. After receiving the final volume of hazardous waste, did the permittee remove from the facility all hazardous waste and mixed 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 X RMK#___

   d. 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 X RMK#___

   e. Did the permittee notify Ohio EPA's Southeast District Office within five working days prior to all rinseate and soil sampling? [Condition B.32.(b)] — Yes ___ No ___ N/A X 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 _X_RMK#___

REMARKS

REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

1. Is the permittee following the procedures as specified in OAC rules 3745-54-17, 3745-55-77 and Section F of the approved application when managing ignitable, reactive and/or incompatible wastes? [Conditions B.7.(a) and C.10. and C.11.] — Yes X No ___ N/A ___ RMK#___

2. Does the permittee ***not*** store incompatible waste ***except*** in accordance with OAC rules 3745-54-17(B) and 3745-55-77, and the terms and conditions of this permit? [Condition C.11.(a)] — Yes X No ___ N/A ___ RMK#___

3. Does the permittee take precautions to prevent placing hazardous waste or mixed waste in an unwashed container that previously held an incompatible waste or material? [Condition C.11.(b)] — Yes X No ___ N/A ___ RMK#___

4. Does the permittee ensure that all containers of incompatible wastes are physically separated from other incompatible wastes or materials by a wall, berm, dike, or other device in accordance with OAC rule 3745-55-77 and the Appendix to OAC rule 3745-55-99? [Condition C.11.(c)] — Yes X No ___ N/A ___ RMK#___

   a. Are all containers of aqueous hazardous acids (ph $\leq$ 2) and caustics ph $\geq$ 12.5) sorted on different pallets and physically separated in different rooms? [Condition C.11.(c)] — Yes X No ___ N/A ___ RMK#___

   b. Are aqueous acids and caustics in poly bottles, and other containers requiring nuclear criticality safety spacing physically separated in the same room by a dike? [Condition C.11.(c)] — Yes X No ___ N/A ___ RMK#___

   c. Are containers of cyanides and sodium metals being stored in rooms physically separate from other incompatible wastes or other incompatible materials? [Condition C.11.(c)] — Yes X No ___ N/A ___ RMK#___

5. Does the permittee provide electrical grounding for all containers, tanks and transport vehicles during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(b)] — Yes X No ___ N/A ___ RMK#___

6.	Does the permittee provide and require the use of spark proof tools during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(c)]	Yes X No___ N/A ___RMK#___
7.	Does the permittee prohibit smoking and open flames in areas where hazardous wastes are managed and post appropriate signs? [Condition B.7.(d)]	Yes X No___ N/A ___RMK#___
8.	As required by OAC rule 3745-55-76, does the permittee store containers of ignitable or reactive wastes greater than 15 meters (50 feet) away from the Portsmouth Gaseous Diffusion Plant reservation boundary? [Condition C.10.(a)]	Yes X No___ N/A ___RMK#___

REMARKS

STORAGE OF HAZARDOUS WASTES IN CONTAINERS

NOTE: *The requirements of permit 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.*

1.	Is the permittee storing in containers, only those wastes as specified in Section A of the Part B permit application? [Condition C.1.(a), C.2.]	Yes X No___ N/A ___RMK#___
2.	Does the permittee limit the total quantity of containerized waste in the container storage area to 133,000 gallons at any given time in the permitted container areas, located in building X-326 and no more than 5,456,000 gallons at any given time in the permitted storage areas located in building X-7725? [Condition C.1.(a)]	Yes X No___ N/A ___RMK#___

NOTE: *For the purposes of compliance with the capacity limitation of the permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity. For example, a 55-gallon drum will be considered to be holding 55 gallons of waste, regardless of the actual quantity stored in the drum. [Condition C.1.(b)]*

3.	When accumulating waste within the permitted X-7725 and X-326 container storage area, does the permittee ensure that the total amount of waste (both > 90 days and < 90 days) does not exceed the maximum container storage inventory established under Condition C.1.? [Condition C.1.(c)]	Yes X No___ N/A ___RMK#___
4.	Are hazardous wastes subject to regulation by the permit stored only at the designated container storage area described in the approved permit application? (See Section D of the permit application) [Condition C.1.(a)]	Yes X No___ N/A ___RMK#___
5.	Is each container stored clearly marked to identify its contents and the date each period of accumulation/storage begins? (See Section D of the permit application) [Condition C.3.]	Yes X No___ N/A ___RMK#___
6.	Does the permittee store hazardous waste in the types of containers described in Section D of the approved permit application? [Condition C.1.(a)]	Yes X No___ N/A ___RMK#___

CONDITION OF CONTAINERS

8. Are containers holding hazardous wastes in good condition? [Condition C.3.] Yes X No___ N/A ___RMK#___

   a. If not, (e.g , severe rusting, structural defects) did the permittee transfer the hazardous waste from such a container to a container that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit and OAC rule 3745-55-71? [Condition C.3.] Yes___No__ N/A _X__RMK#___

9. 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 C.4.] Yes X No___ N/A ___RMK#___

10. Is storage conducted in the container storage containment system as described in Condition C.1. of the permit and Section D of the approved permit application? [Condition C.5.(a)] Yes X No___ N/A ___RMK#___

11. 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 C.5.(b)] Yes X No___ N/A ___RMK#___

12. Are lab-pack wastes handled in compliance with applicable storage requirements? [Condition C.5.(c)] Yes X No___ N/A ___RMK#___

13. Are lab-pack wastes packaged in drums containing absorbent material that is compatible with the wastes? [Condition C.5.(d)] Yes X No___ N/A ___RMK#___

INSPECTIONS

14. Is the permittee inspecting the container area weekly in accordance with OAC rules 3745-54-15, and 3745-54-73 and the approved inspection schedule (Section F) to detect leaking containers and deterioration of containers and the containment system? [Condition C.8.] Yes X No___ N/A ___RMK#___

   a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken? [Condition C.8.] Yes X No___ N/A ___RMK#___

b. On days when containerized waste are added or removed to and/or from any of the permitted areas for storage, does the permittee conduct inspections as described in Section F of the approved Part B permit application and maintain the inspection results in the facility operating record? [Condition C.8.] Yes X No___ N/A ___RMK#___

CONTAINMENT SYSTEM

15. Does the permittee maintain the containment system as described in Section D of the approved Part B permit application, including: [Condition C.6.] Yes X No___ N/A ___RMK#___

a. Sufficient design to contain 10% of the total volume of the containers or the volume of the largest container, whichever is greater? [Condition C.6.(b)] Yes X No___ N/A ___RMK#___

b. A system which is free of gaps and sufficiently impervious to contain leaks and spills? Yes X No___ N/A ___RMK#___

c. Equipped with a coating which is compatible with each waste stored in the area? Yes X No___ N/A ___RMK#___

d. *For those wastes which are deemed incompatible with liner material:* Has the permittee installed a separate secondary containment structure within the existing structure which is equipped with a compatible liner? Yes___No___ N/A X RMK#___

16. Has the permittee had a spill or leak of wastes or an accumulation of precipitation in the containment system? If so, Yes___No X N/A ___RMK#___

a. Are spilled or leaked wastes and accumulated precipitation removed from the sump or collection area in a timely manner? [Condition C.6.(c)] Yes___No___ N/A X RMK#___

b. Does removal of spilled/leaked wastes and accumulated precipitation occur within 24 hours from the time the spill or leak waste is discovered? [Condition C.6.(c)] Yes___No___ N/A X RMK#___

REQUIRED AISLE SPACE

17. Is the permittee maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in the event of an emergency to any area of the facility as required by OAC rule 3745-54-35? [Condition B.12.] Yes_X_No___ N/A ___RMK#___

CLOSURE AND POST-CLOSURE

18. At closure of the container storage area, did the permittee remove all hazardous waste, hazardous waste residues, mixed waste and mixed waste residues from the containment system, in accordance with the procedures set forth in the approved closure plan (Section I of the permit application)? [Condition C.13.(a)] Yes___No___ N/A _X_RMK#___

19. During closure, if the permittee could not demonstrate that all contaminated soils could be removed, did the permittee close the unit and perform post-closure care following a plan approved by Ohio EPA? [Condition C.13.(b)] Yes___No___ N/A _X_RMK#___

CONTAINER STORAGE OF RESIDUAL WASTE

20. Is the permittee complying with the provisions of Section C-2E of the application as amended pursuant to Condition B.2.(b) of this permit? Yes_X_No___ N/A ___RMK#___

LAND DISPOSAL RESTRICTION REQUIREMENTS

PROHIBITION AGAINST DILUTION

1. Has the permittee updated the annual Federal Facility Compliance Act Schedule? [OAC rule 3745-270-50; Condition B 36.] — Yes X No___ N/A ___RMK#___

2. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [OAC rule 3745-270-40 through 49; Condition B.36.(c)] — Yes___No X N/A ___RMK#___

   a. As a substitute for adequate treatment to achieve compliance with LDR treatment standards? — Yes___No___ N/A X RMK#___

   b. To circumvent the effective date of a prohibition (e.g., to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)? — Yes___No___ N/A X RMK#___

   c. To otherwise avoid a prohibition in OAC rule 3745-270-30 through -39? — Yes___No___ N/A X RMK#___

   d. To otherwise avoid a prohibition imposed by Section 3004(d) of RCRA? — Yes___No___ N/A X RMK#___

NOTE: *If the answer to any of Questions 2(a) through 2(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of OAC rule 3745-270-03 [Condition B.36.]. Dilution of wastes is permissible under some conditions. See OAC rule 3745-270-03(B).*

GENERATOR REQUIREMENTS

3. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No_ N/A ___RMK#__

   a. ***For determinations based solely on knowledge of the waste:*** Is supporting data used to make this determination being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No___ N/A ___RMK#___

   b. ***For determinations based upon analytical testing:*** Is a copy of waste analysis data being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No___ N/A ___RMK#___

4. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g., wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [OAC rule 3745-270-07; Condition B.36.(e)] Yes X No___ N/A ___RMK#___

5. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [OAC rule 3745-270-07(A); Condition B.36.(e)] Yes X No___ N/A ___RMK#___

6. Does the entity generate any listed waste(s) which are restricted from land disposal? If so, Yes X No___ N/A ___RMK#___

   a. Do such wastes also exhibit hazardous waste characteristics as identified in OAC rules 3745-51-20 to 3745-51-24? Yes X No___ N/A ___RMK#___

   b. ***For listed wastes which also exhibit a characteristic*:** Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [OAC rule 3745-270-09(A)] Yes X No___ N/A ___RMK#___

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC rule 3745-270-09(B)].*

NOTIFICATION/CERTIFICATION

7. ***For wastes that do not meet treatment standards:*** Has the generator submitted a one-time written notice to the treatment/storage facility receiving the wastes, that wastes being received do not meet treatment standards? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No___ N/A ___RMK#___

   If so, does the notice including the following:

   a. EPA hazardous waste number? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No___ N/A ___RMK#___

   b. Appropriate treatment standard for the waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No___ N/A ___RMK#___

c. The manifest number associated with the first shipment of waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No ___ N/A ___ RMK#___

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No ___ N/A ___ RMK#___

e. Applicable wastewater/non-wastewater category [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No ___ N/A ___ RMK#___

f. For hazardous debris, list the contaminants subject to treatment, as described in paragraph (B) of OAC rule 3745-270-45; and an indication that these contaminants are being treated to comply with OAC rule 3745-270-45. — Yes X No ___ N/A ___ RMK#___

g. For contaminated soil list the constituents subject to treatment as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. — Yes X No ___ N/A ___ RMK#___

8. ***For wastes that meet treatment standards:*** Does the generator submit a one-time written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes ___ No ___ N/A X RMK#___

If so, does the notice/certification including the following:

a. EPA hazardous waste identification number? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes ___ No ___ N/A X RMK#___

b. The corresponding treatment standards and applicable prohibitions for the waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes ___ No ___ N/A X RMK#___

c. The manifest number associated with the shipment of waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes ___ No ___ N/A X RMK#___

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes__No__ N/A _X_RMK#__

e. Is the certification signed by the generator or an authorized representative? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes__No__ N/A _X_RMK#__

f. For contaminated soil list the constituents subject to treatment as described as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. Yes__No__ N/A _X_RMK#__

9. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years? [OAC rule 3745-270-07(A)(8); Condition B.36.(j)] Yes X No X N/A ___RMK#___

UDS D002 Shipment 6/12/06 - no LDR form in File.

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

NOTE: *The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate LDR wastes that do not meet treatment standards in tanks or containers. A LQG who stores LDR wastes on-site for greater than 90 days becomes a operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.*

NOTE: *The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [OAC rule 3745-270-50(E); 40 CFR 268.50(e)]*

10. Is the owner/operator storing LDR restricted wastes in containers? If so, is each container marked with the following information in accordance with OAC rule 3745-270-50(A)(2)(a) [Condition B.36(l)] Yes_X_No__ N/A ___RMK#__

a. The identification of the contents? Yes_X_No__ N/A ___RMK#__

b. The date which accumulation began? Yes_X_No__ N/A ___RMK#__

NOTE: *A TSD facility may store LDR wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [OAC rule 3745-270-50(B)]. During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.*

11. Are LDR wastes being stored at the facility for greater than one year? If so,

    a. Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [OAC rule 3745-270-50(B); Condition B.36(m)]

    Yes_X_No___ N/A ___RMK#___

RCRA HAZARDOUS WASTE GENERATOR INSPECTION CHECKLIST

Company: Portsmouth Gaseous Diffusion Plant EPA ID#: OH7 890 008 983

Street: 3930 US Route 23 South City: Piketon

County: Pike State: Ohio Zip: 45661

Mailing Address: PO Box 700, Piketon, Ohio 45661-0700

(If different from above)

Telephone: 740-897-5010 Fax #:

Owner/ Operator: Federal Government/Co-Operator LATA/Parallax Portsmouth, LLC

(If different from above)

Street:

City: State: Ohio Zip:

Inspection Date(s): 6/19/2006 - 6/22/2006 Time(s): 8:00 am -

Inspection Announced? _____ Yes ___X__ NO If so, how much advance notice given?

	Name	Affiliation	Telephone
Inspectors	Melody Stewart	OEPA	740-380-5256
	Walt Francis	U.S. EPA	312-353-4921
Facility Representative:	Melda Rafferty	U.S. DOE	740-897-897-5010
	Rosemary Richmond	LATA/Parallax Portsmouth, LLC	740-897-2967

Complete All Other Applicable Checklists

Generator Classification	Waste Management Activity
_____ Conditionally Exempt SQG (CESQG)	___X_ Containers
_____ Small Quantity Generator (SQG)	_____ Tank(s)
___X_ Large Quantity Generator (LQG)	_____ Land Disposal Requirements (LDR)
_____ No Generation	_____ Used Oil
	___X_ Universal Waste
	_____ Other

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

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

PROCESS DESCRIPTION

Historically, the main function of the DOE-PORTS facility was to enrich uranium for military use (nuclear submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in UF6 feedstock which contains 0.711% U235. However, in 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). USDOE retained ownership of the ongoing site environmental restoration program as well as two permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and are leased by USEC These include decontamination of equipment and uranium recovery (X-705 Bldg.); chemical cleaning of equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); photo and printing lab (X-100); vehicle repair (X-750); coal pile runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in DOE owned and permitted storage facilities. Waste generated by DOE from the environmental restoration is also stored in these facilities. USEC ceased the enrichment process in May 2001.

WASTE MANAGEMENT, GENERATION AND AMOUNT

Uranium contaminated hazardous wastes (mixed waste) which were/are generated by USEC and DOE are stored on-site in DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of TSDs in the U.S. which could accept mixed waste, and a May 1991 DOE moratorium on off-site waste shipment. A large percentage of the waste generated at PORTS is DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in DOE-owned storage areas During the past year, numerous shipments of hazardous waste were manifested off-site by both DOE and USEC. This is due to an increase in treatment capacity at off-site commercial treatment facilities and DOE treatment facilities, the lifting of the moratorium, and the execution of the site treatment plans for DOE and USEC. DOE sends some waste off-site (to U.S. DOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to DOE for storage in the interim prior to their final disposal.

Hazardous

The DOE Part B permit lists numerous hazardous waste codes for wastes that are generated by the above processes and the environmental restoration. These are stored in drums ranging in size from 30 to 110 gallon capacity, 5 gallon containers, 20 gallon lab packs, 5' cans, 4'x4'x6' boxes, 4'x4'x8' boxes, polybottles and laboratory bottles.

Nonhazardous

A wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes.

HAZARDOUS WASTE MANAGEMENT UNITS

The following DOE-owned permitted storage facilities were inspected during the CEI:

-X-7725 Container Storage Facility
-X-326 Container Storage Facility

In addition, DOE-owned and operated HWMUs and SAAs were inspected in the following buildings:

-X-326	-X-622
-X-7725	-X-624
-X-623	-X-3012
-X-333	-X-330
-X-622T	-X-747H
-X-3346	

Other Areas - X-744G Uranium Management Center

REGULATORY/ENFORCEMENT HISTORY

As a result of violations of state and federal hazardous waste regulations found during the 1987, 1988, and 1989 OEPA RCRA inspections, USDOE and OEPA entered into a Consent Decree governing restoration of the environment at DOE-PORTS. This decree includes a requirement that DOE close the X-701B, X-749, X-231B, and X-616 units within specific timeframes. The X-749, X-616 and X-231B units have now been closed. X-701B is yet to be closed.

On October 4, 1995, DFFOs were signed which allowed DOE to store LDR wastes in excess of one year, so long as waste is being stored in compliance with the orders and an approved site treatment plan. These orders supercede the May 18, 1993, DFFOs.

On February 24, 1998, DOE, LMES and Ohio signed DFFOs and a Consent Order regarding past violations and the management of DUF6 and LiOH.

On March 18, 1999, DOE and Ohio EPA signed DFFOs. These DFFOs provide exemptions to DOE and integrate the following unclosed units into the CMS/CMI process: X-749, X-231B, X-701C, X701B, X-230J7, and X-744Y.

A RCRA Permit was issued to DOE and its current co-operator, Bechtel Jacobs, for the X-7725 and X-326 storage facilities on March 15, 2001.

POLLUTION PREVENTION

Note to the Inspector: This checklist has been developed to help the division in gathering general information about the pollution prevention (P2) practices that the company may have initiated or attempted to initiate. The checklist is also used to:

- Facilitate P2 discussions;
- Identify barriers to P2;
- Define the P2 universe;
- Identify the need for future P2 initiatives;
- Identify partnership opportunities; and
- Link companies with better P2 resources.

As a prelude to completing this checklist the inspector should use the following list of questions as a way to initiate a dialogue concerning P2:

1. Have you tried to reduce the volume of waste (hazardous and nonhazardous) that you generate?

2. What is the largest waste stream that you generate?

3. How important would it be to you to eliminate that waste stream?

4. Does your company understand the reduced regulatory burden and cost saving benefits that eliminating or reducing a waste stream can have?

5. Could you use better housekeeping practices to reduce the amount of waste that you generate?

If the company responds with one of the answers below, the appropriate box should be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided or in the remarks section.

1. Has the company undertaken any P2 activities to reduce the amount of hazardous waste generated? Yes ___ No___N/A ___RMK#___

   a. ***If so,*** what has the company done to minimize hazardous waste generation?

   - ❑ A change in the process resulting in less waste.
   - ❑ A change in the product resulting in less waste.
   - ❑ Use of fewer and less toxic hazardous raw materials.
   - ❑ Better operations/improved housekeeping.
   - ❑ On-site recycling/reuse of hazardous materials.
   - ☒ Sending waste off-site for recycling/reuse.
   - ❑ Other activities (specify): _____

   b. ***If so,*** what hazardous wastes have been addressed?

   - ❑ Solvents
   - ❑ Paint related wastes

- ☐ Industrial process wastes (sludges, slags, contaminated waste waters, etc)
- ☐ Contaminated oils/hydraulic fluids
- ☐ Off-spec chemicals
- ☒ Fluorescent light bulbs
- ☒ Used batteries
- ☐ Shop rags
- ☐ Other (specify): _____

c. ***If not,*** why hasn't the company considered P2?

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

2. Does the company plan to do P2 activities in the future? Yes X No ___ N/A ___RMK#___

3. Would the company be interested in receiving additional information from Ohio EPA about P2? Yes X No___ N/A ___RMK#___

4. Did you give the company information about P2 during the inspection? Yes X No___ N/A ___RMK#___

5. Would the company like a P2 assessment? Yes___ No X N/A ___RMK#___

If the company would like a P2 assessment done at their facility, the inspector must give the company representative a copy of the Pollution Prevention Assessments for Hazardous Waste Generators document and discuss it with them.

6. If the company does not want a P2 assessment, why not? Company has program in place.

REMARKS

LARGE QUANTITY GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] — Yes X No ❑ N/A ___ RMK#___

2. Has the generator obtained an identification number? [3745-52-12] — Yes X No ❑ N/A ___ RMK#___

3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41] — Yes X No ❑ N/A ___ RMK#___

WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? If so: — Yes___ No X N/A ___ RMK#___

   a. Has the generator notified U.S. EPA of export/import activity? [3745-52-53] — Yes ___ No ❑ N/A X RMK#___

   b. Has the generator complied with special manifest requirements? [3745-52-54] — Yes ___ No ❑ N/A X RMK#___

   c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] — Yes ___ No ❑ N/A X RMK#___

   d. Has an annual report been submitted to U.S. EPA? [3745-52-56] — Yes ___ No ❑ N/A X RMK#___

   e. Are export related documents being maintained on-site? [3745-52-57] — Yes ___ No ❑ N/A X RMK#___

GENERATOR CLOSURE REQUIREMENTS

5. Has the generator closed any <90-day accumulation unit(s) since the date of the last inspection? If so: — Yes___ No X N/A ___ RMK#___

   a. Describe the unit(s) which the generator has closed.

   b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] — Yes ___ No ❑ N/A X RMK#___

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

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

REMARKS

MANIFEST REQUIREMENTS

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

Are you aware of what the statement that you sign on the manifest says? Yes X No___

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

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

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

2. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] — Yes X No ☐ N/A ___RMK#___

NOTE: ***U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]***

3. Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)] — Yes X No ☐ N/A ___RMK#___

NOTE: ***The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].***

4. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: — Yes___ No X N/A ___RMK#___

   a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] — Yes ___ No ☐ N/A X RMK#___

5. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)] — Yes X No ☐ N/A ___RMK#___

6. Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not: — Yes X No___ N/A X RMK#___

   a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)] — Yes ___ No ☐ N/A X RMK#___

b. If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]

Yes ___ No ☐ N/A X RMK#___

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

Yes X No ☐ N/A ___ RMK#___

REMARKS

PERSONNEL TRAINING

1. Does the generator keep records required by 3745-65-16(D) including:

   a. Job titles, as they relate to hazardous waste management, and the name of each employee filling each job? — Yes X No ☐ N/A ___ RMK#___

   b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position? — Yes X No ☐ N/A ___ RMK#___

   c. Type and amount of both introductory and continuing training to be given to each person filling a position? — Yes X No ☐ N/A ___ RMK#___

   d. Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)? — Yes X No ☐ N/A ___ RMK#___

NOTE: ***If the facility's business practices precludes written job titles/descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be used to document that all necessary employees have been trained.***

2. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to their positions? [3745-65-16(A)(2) — Yes X No ☐ N/A ___ RMK#___

3. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]

   a. Emergency procedures? — Yes X No ☐ N/A ___ RMK#___

   b. Emergency equipment? — Yes X No ☐ N/A ___ RMK#___

   c. Emergency systems? — Yes X No ☐ N/A ___ RMK#___

4. Does emergency training described in 3(a), (b) and (c) above include, *where applicable*: [3745-65-16(A)(3)(a-f)

   a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? — Yes X No ☐ N/A ___ RMK#___

b. Key parameters for automatic waste feed cut-off systems? Yes X No ☐ N/A ___RMK#___

c. Communication or alarm system? Yes X No ☐ N/A ___RMK#___

d. Response procedures for fire/explosions? Yes X No ☐ N/A ___RMK#___

e. Response to groundwater contamination incidents? Yes X No ☐ N/A ___RMK#___

f. Shutdown procedures? Yes X No ☐ N/A ___RMK#___

5. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes X No ☐ N/A ___RMK#___

6. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes X No ☐ N/A ___RMK#___

7. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes X No ☐ N/A ___RMK#___

8. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)] Yes X No ☐ N/A ___RMK#___

9. Are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes X No ☐ N/A ___RMK#___

10. ***Optional***: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifests, etc.

Job Performed	**Name of Employee**	**Date(s)Trained**

REMARKS

CONTINGENCY PLAN

1. Does the generator have a contingency plan which describes the following: [3745-65-52(A) through (F)]

   a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? — Yes X No ❑ N/A ___ RMK#___

   b. Arrangements/agreements with emergency authorities? [3745-65-37] — Yes X No ❑ N/A ___ RMK#___

   c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? — Yes X No ❑ N/A ___ RMK#___

   d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? — Yes X No ❑ N/A ___ RMK#___

   e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary? — Yes X No ❑ N/A ___ RMK#___

NOTE: ***If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]***

2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] — Yes X No ❑ N/A ___ RMK#___

3. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)(B)] — Yes X No ❑ N/A ___ RMK#___

4. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] — Yes X No ❑ N/A ___ RMK#___

EMERGENCY COORDINATOR

5. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] — Yes X No ❑ N/A ___ RMK#___

NOTE: ***The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan***

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes___ No_X_ N/A ___RMK#___

   a. Was the contingency plan implemented? [3745-65-51(B)] Yes ___ No ☐ N/A _X_ RMK#___

   b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes ___ No ☐ N/A _X_ RMK#___

   c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes ___ No ☐ N/A _X_ RMK#___

NOTE: ***OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.***

REMARKS

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

1. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] — Yes X No ☐ N/A ___ RMK#___

2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]

   a. Internal alarm system? — Yes X No ☐ N/A ___ RMK#___

   b. Emergency communication device? — Yes X No ☐ N/A ___ RMK#___

   c. Portable fire control, spill control and decon equipment? — Yes X No ☐ N/A ___ RMK#___

   d. Water of adequate volume/pressure? — Yes X No ☐ N/A ___ RMK#___

3. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] — Yes X No ☐ N/A ___ RMK#___

4. Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33] — Yes X No ☐ N/A ___ RMK#___

5. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32)*? [3745-65-34] — Yes X No ☐ N/A ___ RMK#___

6. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] — Yes X No ☐ N/A ___ RMK#___

7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] — Yes X No ☐ N/A ___ RMK#___

   a. Where authorities have declined to enter into arrangements/agreements, has the generator documented such a refusal? [3745-65-37(B)] — Yes ___ No ☐ N/A X RMK#___

REMARKS

GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)] — Yes ☐ No X N/A ___RMK#___

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

2. Does the generator ensure that satellite accumulation area(s):

   a. Are at or near a point of generation? — Yes X No ☐ N/A ___RMK#___

   b. Are under the control of the operator of the process generating the waste? — Yes X No ☐ N/A ___RMK#___

   c. Do not exceed a total of 55 gallons of hazardous waste? — Yes X No___ N/A ___RMK#___

   d Do not exceed one quart of acutely hazardous waste at any one time? — Yes X No ☐ N/A ___RMK#___

   e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? — Yes X No ☐ N/A ___RMK#___

NOTE: ***The 55 gallon limit applies to the area itself, and not to each individual waste stream accumulated in the area. The inspector should refer to Ohio EPA's November 1994 Guidance on the Location of Satellite Accumulation Areas.***

3. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so: — Yes___ No X N/A ___RMK#___

   a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? — Yes ___ No ☐ N/A X RMK#___

   b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? — Yes ___ No ☐ N/A X RMK#___

USE AND MANAGEMENT OF CONTAINERS

4. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] — Yes X No ☐ N/A ___RMK#___

5. Is the accumulation date on each container? [3745-52-34(A)(2)] — Yes X No ❑ N/A ___RMK#___

6. Are hazardous wastes stored in containers which are:

   a. Closed (except when adding/removing wastes)? [3745-66-73(A)] — Yes X No ❑ N/A ___RMK#___

   b. In good condition? [3745-66-71] — Yes X No ❑ N/A ___RMK#___

   c. Compatible with wastes stored in them? [3745-66-72] — Yes X No ❑ N/A ___RMK#___

   d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] — Yes X No ❑ N/A ___RMK#___

7. Is the container accumulation area(s) inspected weekly? [3745-66-74] (*Note location in general information section of checklist)* — Yes X No ❑ N/A ___RMK#___

   a. Are inspections recorded in a log or summary? [3745-66-74] — Yes X No ❑ N/A ___RMK#___

8. For ignitable and/or reactive hazardous waste(s):

   a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] — Yes X No ❑ N/A ___RMK#___

   b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] — Yes X No ❑ N/A ___RMK#___

PRE-TRANSPORT REQUIREMENTS

9. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] — Yes X No ❑ N/A ___RMK#___

10. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] — Yes X No ❑ N/A ___RMK#___

11. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] — Yes X No ❑ N/A ___RMK#___

E:\USDOEPortsmouthChecklists\USDOEPortsLQG2006.wpd

REMARKS

LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] **If so**: Yes X No ❑ N/A ___RMK#___

   a. **For determinations based solely on knowledge of the waste:** Is supporting data retained on-site? [3745-270-07(A)(6)] Yes X No ❑ N/A ___RMK#___

   b. **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-270-(A)(6)] Yes X No ❑ N/A ___RMK#___

2. Has the generator determined each Ohio EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2)] Yes X No ❑ N/A ___RMK#___

3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes X No ❑ N/A ___RMK#___

4. Does the generator generate a characteristic hazardous waste? **If so:** Yes X No___ N/A ___ RMK#___

   a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes X No ❑ N/A ___RMK#___

NOTE: *If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.*

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] **If so:** Yes X No___ N/A ___ RMK#___

   a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes X No ❑ N/A ___ RMK#___

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]*

6. Has the generator **correctly** determined if restricted wastes meet or exceed treatment standards? [3745-270-07(A)(1)] Yes X No ❑ N/A ___RMK#___

7. Does the generator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03]

Yes X No ❑ N/A ___RMK#___

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

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)]

Yes ❑ No___ N/A _X_RMK#___

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)]

Yes ❑ No___ N/A_X_RMK#___

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] **If so:**

Yes ___ No_X_ N/A ___RMK#___

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

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] **If so:**

Yes ___ No_X_ N/A ___RMK#___

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

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? **If so:**

Yes ___ No _X_ N/A ___RMK#___

a. Has the facility complied with 3745-270-04?

Yes ___ No ❑ N/A _X_RMK#___

REMARKS

NOTIFICATION AND CERTIFICATION REQUIREMENTS

12. If a generators' waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1? [3745-270-07(A)(2)] — Yes X No ❑ N/A___ RMK#___

13. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1? [3745-270-07(A)(3)] — Yes X No ❑ N/A ___ RMK#___

14. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc) does the generator have the paperwork required in Column C of Table 1? [3745-270-07(A)(4)] — Yes ___ No ❑ N/A X RMK#___

15. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1? [3745-270-07(A)(9)] — Yes ___ No ❑ N/A X RMK#___

16. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] **If so:** — Yes X No___ N/A __RMK#___

    a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] — Yes X No ❑ N/A __RMK#___

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

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

NO LDR FORM WDS SHIPMENT OF DUST 6/12/06.

REMARKS

GENERATORS TREATING HAZARDOUS WASTE

1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40? Yes___ No_X_ N/A ___ RMK#___

2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)] Yes ___ No ❑ N/A _X_ RMK#___

   a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)] Yes ___ No ❑ N/A _X_ RMK#___

   b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] Yes ___ No ❑ N/A _X_ RMK#___

3. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] Yes ___ No ❑ N/A _X_ RMK#___

4. Have the treated wastes met the applicable treatment standards in 3745-270-40? Yes ___ No ❑ N/A _X_ RMK#___

NOTE: *If the waste is a characteristic waste, which has been treated to render it non hazardous and subsequently sent to a solid waste landfill, proceed to question 7 & 8.*

5. Has the generator sent a notification and certification with the initial shipment of waste?[3745-270-07(A)(5)(c)] Yes ___ No ❑ N/A _X_ RMK#___

6. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)] Yes ___ No ❑ N/A _X_ RMK#___

7. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following: Yes ___ No ❑ N/A _X_ RMK#___

   i. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes ___ No ❑ N/A _X_ RMK#___

   ii. A description of the waste, including EPA hazardous waste numbers and treatability group, and UHCs? [3745-270-09(D)(1)(b)] Yes ___ No ❑ N/A _X_ RMK#___

NOTE: *If the waste will be treated and monitored for **all** UHCs then they do not need to be listed on the notice.*

8. Has the process/operation generating the waste or the solid waste landfill facility changed? If so: Yes ___ No___ N/A _X_ RMK#___

   a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)] Yes ___ No ❑ N/A _X_ RMK#___

   b. Has the director been notified of such changes? [3745-270-09(D)] Yes ___ No ❑ N/A _X_ RMK#___

NOTE: *The director need only be notified on an annual basis but no later than December 31.*

9. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: Yes ___ No___N/A _X_ RMK#___

   a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49(C)] Yes ___ No ❑ N/A _X_ RMK#___

10. Does each notification/certification form completed, contain the information found in Table1? [3745-270-07(A)(3)] Yes ___ No ❑ N/A _X_ RMK#___

NOTE: *If the waste will be treated and monitored for all constituents, there is no need to put them all on the LDR notice.*

REMARKS

HAZARDOUS DEBRIS

1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)? Yes ___ No___ N/A _X__ RMK#___

2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.) Yes ___ No___ N/A _X__ RMK#___

3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so: Yes ___ No___ N/A _X__ RMK#___

   a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)] Yes ___ No ❑ N/A _X__ RMK#___

NOTE: *If immobilization has been used in a treatment train, it must be the last treatment technology used.*

4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so: Yes___ No___ N/A _X__ RMK#___

   a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)] Yes ___ No ❑ N/A _X__ RMK#___

5. Is the waste a PCB waste under 40 CFR Part 761? If so: Yes ___ No___ N/A _X__ RMK#___

   a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 270? [3745-270-45(A)(5)] Yes ___ No ❑ N/A _X__ RMK#___

6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)] Yes ___ No ❑ N/A _X__ RMK#___

7. Does the owner/operator of a treatment facility that claims the debris is excluded under 3745-51-03(F)(1) maintain the following information?

   a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)] Yes ___ No___ N/A _X__ RMK#___

   b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)] Yes ___ No ❑ N/A _X__ RMK#___

c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)] — Yes ___ No ❑ N/A _X_ RMK#___

8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F) have the following information? [3745-270-07(D)(3)] — Yes ___ No ❑ N/A _X_ RMK#___

a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)] — Yes ___ No___ N/A _X_ RMK#__

b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)] — Yes ___ No ❑ N/A _X_ RMK#___

c. Technology used from Table 1? [3745-270-07(D)(1)(c)] — Yes ___ No ❑ N/A _X_ RMK#___

9. Has the above notification been sent to the director? [3745-270-07(D)(1)] — Yes ___ No ❑ N/A _X_ RMK#___

REMARKS

TREATING FACILITIES

1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-14?[3745-270-07(B)] — Yes_X_ No ❑ N/A ___RMK#___

2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)] — Yes_X_ No ❑ N/A ___RMK#___

Note: *No further notification is necessary until such time that the waste changes or the receiving facility changes.*

3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07?[3745-270-07(B)(3)] — Yes_X_ No ❑ N/A ___RMK#___

4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so**: — Yes___ No___ N/A _X_RMK#___

   a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)] — Yes___ No ❑ N/A_X_RMK#___

5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-58-30? **If so:** — Yes ___ No___ N/A_X_RMK#___

   a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)], excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)] — Yes ___ No ❑ N/A_X_RMK#___

   b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4)[3745-270-07(B)(6)] — Yes ___ No ❑ N/A _X_RMK#___

   c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B))(6)] — Yes ___ No ❑ N/A _X_RMK#___

6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)] — Yes ___ No ❑ N/A _X_RMK#___

7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-70 have: — Yes _X_ No___ N/A ___RMK#___

a. Copies of all notices and certifications required in 3745-270? Yes X No ❑ N/A ___RMK#___

b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49? Yes X No ❑ N/A ___RMK#___

c. Followed the testing frequency specified in the facilities WAP? Yes X No ❑ N/A ___RMK#___

REMARKS

LARGE QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

GENERAL REQUIREMENTS

Has the LQUWH obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)] — Yes ✓ No ☐ N/A ~~X~~ RMK#___

PROHIBITIONS

2. Did the LQUWH dispose of universal waste? [3845-273-31(A)] — Yes ~~X~~ No ✓ N/A ___ RMK#___

3. Did the LQUWH dilute or treat universal waste, except when responding to releases or by managing specific wastes as provided in OAC 3745-273-33? [3745-273-31(B)] — Yes ☐ No ~~X~~ N/A X RMK#___

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES:

4. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)] — Yes ✓ No ☐ N/A ~~X~~ RMK#___

5. If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? — Yes ✓ No ☐ N/A ~~X~~ RMK#___

6. Does the LQUWH conduct any of the following activities:

   a. Sort batteries by type? — Yes X No ___ N/A ___ RMK#___

   b. Mix battery types in one container? — Yes ___ No X N/A ___ RMK#___

   c. Discharge batteries to remove the electric charge? — Yes ___ No X N/A ___ RMK#___

   d. Regenerate used batteries? — Yes ___ No X N/A ___ RMK#___

   e. Disassemble them into individual batteries or cells? — Yes ___ No X N/A ___ RMK#___

   f. Remove batteries from consumer products? — Yes X No ___ N/A ___ RMK#___

   g. Remove the electrolyte from the battery? — Yes ___ No X N/A ___ RMK#___

   If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-33(A)(2)] — Yes ☐ No ___ N/A X RMK#___

7. If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)] — Yes ___ No ☐ N/A _X_ RMK#___

   a. If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)] — Yes ___ No ☐ N/A _X_ RMK#___

   b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)] — Yes ___ No ☐ N/A _X_ RMK#___

8. Are the battery(ies) or container(s) of batteries located with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-34(A)] — Yes _X_ No ☐ N/A ___ RMK#_2_

UNIVERSAL WASTE PESTICIDES

9. Does the LQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-33(B)(1)] — Yes _X_ No ☐ N/A _X_ RMK#___

10. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-33(B)(2)] — Yes ___ No ☐ N/A _X_ RMK#___

11. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 66-992, except for paragraph (C) of 3745-66-97; rule 3745-66-991 and 3745-66-992 of the OAC met? [3745-273-33(B)(3)] — Yes ___ No ☐ N/A _X_ RMK#___

12. Is pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-33(B)(4)] — Yes ___ No ☐ N/A _X_ RMK#___

13. Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)] — Yes ___ No ☐ N/A _X_ RMK#___

14. Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)] — Yes ___ No ❑ N/A _X_ RMK#___

UNIVERSAL WASTE THERMOSTATS

15. Are thermostats that show evidence of leakage, spillage or damage that could cause leaks, properly contained? [3745-273-33(C)(1)] — Yes ___ No ❑ N/A _X_ RMK#___

16. If the thermostats are contained, are the containers closed, structurally sound, compatible with contents of the thermostats and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(C)(1)] — Yes ___ No ❑ N/A _X_ RMK#___

17. If the mercury-containing ampules are removed, does the LQUWH: [3745-273-33(C)(1)]

a. Remove the ampules in a manner to prevent breakage and is the removal done over a containment device? [3745-273-33(C)(2)(a)(b)] — Yes ___ No ❑ N/A _X_ RMK#___

b. Have a clean-up system readily available to transfer spilled material to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-33(C)(2)(c)(d)] — Yes ___ No ❑ N/A _X_ RMK#___

c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-33(C)(2)(e)] — Yes ___ No ❑ N/A _X_ RMK#___

d. Ensure employees are thoroughly familiar with proper waste handling and emergency procedures? [3745-273-33(C)(2)(f)] — Yes ___ No ❑ N/A _X_ RMK#___

e. Ensure removed ampules are stored in closed, non-leaking containers that are in good condition? [3734-273-33(C)(2)(g)] — Yes ___ No ❑ N/A _X_ RMK#___

f. Pack removed ampules in containers with packing material to prevent breaking during storage, handling and transportation? [3745-273-33(C)(2)(h)] — Yes ___ No ❑ N/A _X_ RMK#___

18. If mercury or clean-up residues resulting from spills or leaks or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-33(C)(3)(a)] — Yes ___ No ❑ N/A _X_ RMK#___

a. If the waste is characteristic, was it managed in compliance with 3745-50 through 3745-69? (*The handler is considered the generator of the mercury, residues, and/or other waste and is subject to Chapter 3745-52)* [3745-273-33(C)(3)(b)] — Yes ___ No ❑ N/A _X_ RMK#___

b. If the mercury, residues and/or other waste are not hazardous, are they managed in compliance with applicable law? [3745-273-33(C)(3)(c)] — Yes ___ No ❑ N/A _X_ RMK#___

19. Are the thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)" [3745-273-34] — Yes ___ No ❑ N/A _X_ RMK#___

ACCUMULATION TIME

20. Is the waste accumulated for less than one year? [3745-273-35(A)] — Yes _X_ No ___ N/A ___ RMK#___

a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on handler to demonstrate) [3745-273-35(B)] — Yes ___ No ❑ N/A _X_ RMK#___

NOTE: ***Accumulation is defined as date generated or date received from another handler.***

21. Has the length of time the universal waste has been accumulated documented by ***one*** of the following: [3745-273-35(C)] — Yes _X_ No ❑ N/A ___ RMK#___

a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-35(C)(1)] — Yes _X_ No _ N/A ___ RMK#_3_

b. Marking or labeling the individual item of universal waste with the date that it became a waste or was received? [3745-273-35(C)(2)] — Yes ___ No _X_ N/A ___ RMK#___

c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-35(C)(3)] — Yes ___ No _X_ N/A ___ RMK#___

d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-35(C)(4)] — Yes ___ No X N/A ___ RMK#___

e. Placing the universal waste in a specific accumulation area and identifying the earliest that any universal waste in the area became a waste or was received? [3745-273-35(C)(5] — Yes ___ No X N/A ___ RMK#___

f. Any other method which clearly demonstrates the length of time the universal waste has been accumulated from the date it became a waste or is received? [3745-273-35(C)(6)] — Yes ___ No X N/A ___ RMK#___

EMPLOYEE TRAINING

22. Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36] — Yes X No ❑ N/A ___ RMK#___

RESPONSE TO RELEASES

23. Were releases of universal waste and other residues immediately contained? [3745-273-37(A)] — Yes ___ No ❑ N/A X RMK#___

24. Was the released material characterized? [3745-273-37(B)] — Yes ___ No ❑ N/A X RMK#___

25. If the released material was a hazardous waste, was it managed as required in OAC 3745-50 through 3745-69? *(If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52)* [3745-273-37(C)] — Yes ___ No ❑ N/A X RMK#___

OFF-SITE SHIPMENTS

NOTE: ***If a LQUWH self-transports wastes, then the handler must comply with the Universal Waste transporter requirements.***

26. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)] — Yes X No ❑ N/A ___ RMK#___

NOTE: ***LQUWHs are prohibited to send waste to any other facility.***

27. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-38(C)] — Yes X No ❑ N/A ___ RMK#___

28. Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)] — Yes X No ❑ N/A ___ RMK#___

29. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following: — Yes ___ No ❑ N/A X RMK#___

a. Receive the waste back? [3745-273-38(E)(1)] — Yes___ No___ N/A X RMK#___

b. Agree to where shipment will be sent? [3745-273-38(E)(2)] — Yes___ No___ N/A X RMK#___

30. If a handler rejects a partial or full load from another handler, does the receiver handler contact the originating handler and discuss one of the following: — Yes ___ No ❑ N/A X RMK#___

a. Sending the waste back to originating handler? [3745-273-38(F)(1)] — Yes___ No___ N/A X RMK#___

b. Sending the shipment to a destination facility? [3745-273-38(F)(2)] — Yes___ No___ N/A X RMK#___

31. If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)] — Yes ___ No ❑ N/A X RMK#___

32. If the handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-38(H)] — Yes ___ No ❑ N/A X RMK#___

Waste, Pesticides and Toxics Division

Type of Document:
- ☐ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☒ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action

Facility Name : U.S. Department of Energy - Portsmouth Gaseous Diffusion Plant

Facility Location: 3930 U.S. Route 23 South

City: Piketon **State:** Ohio

U.S. EPA ID# OH7 890 008 983

Assigned Staff W. Francis **Phone:** 312-353-4921

Name	Signature	Date
Author **W. Francis**	W. F	8/8/05
Regional Counsel	----------	
Section Chief **P. Little**	PLL	8-8-05
Branch Chief	----------	

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
   Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 0 9 2005

REPLY TO THE ATTENTION OF DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William E. Murphie
Manager
Portsmouth/Paducah Project Office
U.S. Department of Energy
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

Mr. Michael C. Hughes
President and General Manager
Bechtel Jacobs Company LLC
P.O. Box 4699
Oak Ridge, Tennessee 37831

Re: Letter of Acknowledgment
RCRA Compliance Evaluation Inspection
U.S. Department of Energy - Gaseous Diffusion Plant
Piketon, Ohio
OH7 890 008 983

Dear Messrs. Murphie and Hughes:

On July 12, 2005, the United States Environmental Protection Agency (U.S. EPA) issued U.S. Department of Energy (DOE) Portsmouth Gaseous Diffusion Plant a Notice of Violation (NOV) which identified a violation of the Ohio Administrative Code and a Resource Conservation and Recovery Act (RCRA) Permit violation at the Piketon, Ohio facility.

U.S. EPA received an April 11, 2005, letter from U.S. DOE and a July 27, 2005, response letter from Bechtel Jacobs Company LLC to the July 12, 2005, NOV.

This letter is to inform you that U.S. EPA has reviewed your responses and determined that additional enforcement action need not be taken at this time.

This position does not limit your liability for compliance with all the applicable provisions of the Resource Conservation and Recovery Act, as amended. Your hazardous waste management operations will continue to be evaluated by U.S. EPA and the Ohio Environmental Protection Agency (OEPA) in the future.

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 50% Recycled Paper (20% Postconsumer)

If you have any questions regarding this letter, please contact Walt Francis of my staff at (312) 353-4921.

Sincerely yours,

Paul Little, Chief
Compliance Section #2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

cc: Melody Stewart, OEPA-Southeast District Office

Waste, Pesticides and Toxics Division

Type of Document:
- ☒ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action

Facility Name : U.S. DOE - Portsmouth

Facility Location: 3930 US Route 23 South

City: Piketon **State:** Ohio

U.S. EPA ID# OH7 890 008 983

Assigned Staff W. Francis **Phone:** 312-353-4921

Name	Signature	Date
Author **W. Francis**	W.	6/22/05
Regional Counsel T. Branigan	T. Branigan / concurrence via E-mail	6/29/05
Section Chief **P. Little**	for Paul Little	7-11-05
Branch Chief	----------	

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's. Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

0292 7650
0292 7643

Terry
Branigan/R5/USEPA/US
06/29/2005 04:17 PM

To

Subject NOVs for Daimler Chrysler and for USDOE/Portsmouth

Walt,

As we discussed, the NOV for USDOE/Portsmouth looks fine to send out.

For the NOV for DaimlerChrysler in Auburn Hills, MI, in addition to the revisions we discussed today, please add the following sentence at the end of the second-to-last paragraph of the NOV (i.e., the paragraph beginning "At this time, U.S. EPA is not requiring Daimler/Chrysler to apply for a storage operating license..."):

> However, please be advised that DaimlerChrysler's compliance with the conditions and requirements described above will not relieve DaimlerChrysler of its liability for the violations identified in this letter. U.S. EPA reserves the right to bring further enforcement actions (including an action for civil penalties) against DaimlerChrysler for the violations identified in this letter.

With this change and the other changes we discussed by telephone today, the DaimlerChrysler NOV could be ready for sign-off and issuance tomorrow. You've indicated U.S. EPA has agreed to give MDEQ 2 days advance notice by email when issuing NOVs to respondents in the State of Michigan. (See July 26, 2004 email from Tinka Hydge, "Revised State Communications Plan". I'll give Tinka a call to see whether this requirement can be relaxed, e.g., if actual notice is given by a telephone call rather than by an email.

Thanks,

Terry

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 12 2005

REPLY TO THE ATTENTION OF DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William E. Murphie
Manager
Portsmouth/Paducah Project Office
U.S. Department of Energy
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

Mr. John Meersman
Manager of Projects
Bechtel Jacobs Company LLC
P.O. Box 900
Piketon, Ohio 45661

Re: Notice of Violation
RCRA Compliance Inspection
U.S. Department of Energy
Portsmouth Gaseous Diffusion Plant
Piketon, Ohio
OH7 890 008 983

Dear Messrs. Murphie and Meersman:

On March 8 and 9, 2005, representatives of the United States Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) inspected the U.S. Department of Energy (U.S. DOE) Portsmouth Gaseous Diffusion Plant located near Piketon, Ohio. The purpose of the inspection was to evaluate compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection checklists for your reference.

U.S. EPA did receive your April 11, 2005, letter regarding the updated Land Disposal Restriction (LDR) Notification Forms from Envirocare of Utah, Inc.

Based on information provided by U.S. DOE and Bechtel Jacobs personnel, review of records, and personal observations by the inspectors, U.S. EPA finds that U.S. DOE is in violation of the

Recycled/Recyclable . Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

following requirements of the Hazardous Waste RCRA Permit, Ohio Administrative Code (OAC) and the United States Code of Federal Regulations (CFR):

- A generator must send a one-time written notice to each treatment or storage facility receiving the waste, and place a copy in the generator's files. The notice must include the information in Column A of Table 1 of this rule. See, OAC § 3745-270-07(A)(2). The notice must include the applicable wastewater/nonwastewater category in rule 3745-270-02 of the OAC and subdivisions made within EPA hazardous waste number based on waste-specific criteria. See, OAC § 3745-270-07(A), Table 1: Generator Paperwork Requirements, Required Information #4. [40 CFR § 268.7] and RCRA Hazardous Waste Permit Condition B.36(j).

  During the records review portion of the inspection, the inspectors reviewed a number of out-bound hazardous waste manifests and attached LDR forms. It appeared that the out-bound hazardous waste manifest LDR forms for those shipments to Envirocare of Utah, Inc. did not have a box to mark either wastewater or non-wastewater. Therefore, U.S. DOE failed to comply with OAC Rule 3745-270-07(A)(2) [40 C.F.R. § 268.7] and violated RCRA Hazardous Waste Permit Condition B.36.(j).

Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a), U.S. EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above requirements.

You should submit your response to Walt Francis, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604. In addition, please submit a copy of your response to Melody Stewart at the OEPA Southeast District Office, 2195 Front Street, Logan, Ohio 43138.

If you have any questions regarding this letter, please contact Walt Francis of my staff at (312) 353-4921.

Sincerely yours,

For Paul Little, Chief
Compliance Section # 2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosures

cc: Melody Stewart, OEPA-Southeast District Office

U.S. EPA REGION 5
WASTE, PESTICIDES AND TOXICS DIVISION
ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME:	**U.S. DOE Portsmouth Gaseous Diffusion Plant**
FACILITY U.S. EPA ID NO.:	**OH7 890 008 983**
FACILITY TYPE:	**Large Quantity Generator/Permitted Storage Facility**
FACILITY ADDRESS:	3930 US Route 23 South Piketon, Ohio 45661
FACILITY REPRESENTATIVE:	Melda Rafferty, Project Manager Chris Guilliams, Environmental Compliance Greg Utrecht, Waste Disposition Engineer
OEPA REPRESENTATIVE:	Melody Stewart Hazardous Waste Inspector Ohio Environmental Protection Agency Southeast District Office 2195 Front Street Logan, Ohio 43138 (740) 380-5256 Melody.Stewart@epa.state.oh.us
U.S. EPA REPRESENTATIVE:	Walt Francis Environmental Scientist U.S. EPA, Region 5 Waste, Pesticides and Toxics Division Enforcement and Compliance Assurance Branch Compliance Section 2 (312) 353-4921 Francis.Walt@epa.gov
DATE(S) OF INSPECTION:	March 8th and 9th, 2005
SIC CODE:	**2819** - Industrial Inorganic Chemicals, Not Elsewhere Classified
NAICS CODE:	**562998** - All other miscellaneous waste management services

PROCESS DESCRIPTION

Historically, the main function of the U.S. DOE-Portsmouth (Portsmouth) facility was to enrich uranium for military use (nuclear submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in uranium hexafluoride (UF6) feedstock which contains 0.711% U235. The Plant had produced enriched uranium continuously since September 1954. In 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). U.S. DOE retained ownership of the ongoing site environmental restoration program as well as two permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and are leased by USEC. These include decontamination of equipment and uranium recovery (X-705 Bldg.); chemical cleaning of equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); photo and printing lab (X-100); vehicle repair (X-750); coal pile runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in U.S. DOE owned and permitted storage facilities. Waste generated by U.S. DOE and Bechtel Jacobs from the environmental restoration is also stored in these facilities. USEC ceased the enrichment process in May 2001.

WASTE MANAGEMENT, GENERATION AND AMOUNT

Uranium contaminated hazardous wastes (mixed waste) which were/are generated by USEC and U.S. DOE are stored on-site in U.S. DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of TSDs in the U.S. which could accept mixed waste, and a May 1991 U.S. DOE moratorium on off-site waste shipment. A large percentage of the waste generated at Portsmouth is U.S. DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in U.S. DOE-owned storage areas. During the past year, numerous shipments of hazardous waste were manifested off-site by both U.S. DOE and USEC. This is due to an increase in treatment capacity at off-site commercial treatment facilities and U.S. DOE treatment facilities, the lifting of the moratorium, and the execution of the site treatment plans for U.S. DOE and USEC. U.S. DOE sends some waste off-site (to U.S. DOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to U.S. DOE - Porstsmouth for storage in the interim prior to their final disposal.

USEC generated hazardous wastes are shipped to Permafix in Florida. In addition, a wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes.

INSPECTION:

U.S. EPA representative Walt Francis and OEPA representative, Melody Stewart arrived at the facility at approximately 7:50 am. The inspectors met Ms. Melda Rafferty from U.S. DOE. The inspection team and Ms. Rafferty then went to a U.S. DOE conference room in Building X-1000 and informed the U.S. DOE and Bechtel Jacobs representatives of the nature, scope, and procedures of the inspection. The inspection was conducted by OEPA and U.S. EPA personnel as a Federal lead inspection. The inspection was conducted to determine the facility's compliance under the Resource, Conservation and Recovery Act (RCRA) and the Ohio Administrative Code (OAC). The facility representatives provided the team with a brief update on activities at the facility. The on-site U.S. DOE personnel allowed the inspectors access to the facility to conduct the inspection.

WALK THROUGH:

The walkthrough began at the X-735A Landfill Service Garage. Inspector Stewart asked about the floor drains. U.S. DOE personnel said that they drain into a ditch outside. We then toured Building X-624 where the inspectors observed a 55-gallon container of F001 PPE and filters and a 55-gallon container of waste TCE. We then toured the SAA in Building X-622 which contained a 55-gallon container of F001 plastic, PPE and filters. We next toured Building X-752 where we observed a 55-gallon container of scrap metal, then on to Building X-747H where we observed a 55-gallon container of used aerosol cans. Also, the inspectors observed a 55-gallon container of used oil and two lead acid batteries outside of Building X-747H. Inspector Stewart asked to see the Contractor Lay Down Area where she had noticed a 55-gallon container and several 5-gallon containers stored outside. The 55-gallon container was labeled "Kure-N-Seal" and the 5-gallon containers were labeled "Coat Supreme Form Release". U.S. DOE personnel said that they would look into why these materials were stored in this area. We then went over to Building X-623 to inspect a less than 90 day area and a SAA. The inspectors observed one 55-gallon container of F001 with a date 12/27/04 and one 55-gallon container of F001 "Neat TCE" with a date of 2/25/05. We then went over to the X-744G Building to observe the T-Hoppers. No change in the T-Hoppers since U.S. EPA's last inspection in August 2004. In Building X-345 we observed small cylinders of UF6. In Building X-627 the inspectors observed one 55-gallon container of Waste TCE which was labeled F001 Filters and PPE. We then went over to Building X-700 where the inspectors observed four 5-gallon containers of used aerosol cans and three 10-gallon containers of waste paint and solvents. We also toured Building X-326 L cage Permitted storage area. Next stop was an SAA DMSA #1 in Building X-326. Then we went on to Buildings X-330 SAA L71, and X-333, SAA UX48, DMSA #13.

The walkthrough continued at Building X-7725 to inspect the permitted storage areas, with Mr. Charlie Bearhs. We inspected Areas C, P-1, P, J, K, G, B, H, D, and the used fluorescent lamp accumulation area. The inspectors wrote down Request for Disposal (RFD) numbers to have U.S. DOE and Bechtel Jacobs pull the waste profiles. The inspectors then went out with U.S. DOE personnel to the South Slurry Wall lock-up area, where the inspectors observed eight 55-gallon containers of contaminated soils from groundwater monitoring well installation, the containers were labeled as Non-Regulated.

RECORDS REVIEW:
The inspectors conducted a records review. The inspection team requested and reviewed hazardous waste manifests, land disposal restriction forms, mixed-waste shipment documentation, universal waste shipping records, personnel training information, weekly inspection logs, RFD waste profiles and the latest contingency plan. The inspectors reviewed hazardous waste manifests since the date of the last inspection. Personnel training records were also reviewed. The inspectors reviewed the latest Contingency Plan. Also, inspector Francis reviewed the requirements of RCRA Section 6002, i.e., the procuring recycled content products requirement for Federal Facilities.

CLOSING CONFERENCE:
The inspectors conducted a closing conference. Inspector Francis told the facility that they would receive a letter from U.S. EPA regarding the inspection. At this closing conference, U.S. DOE and Bechtel Jacobs staff agreed to resolve U.S. EPA's and OEPA's question regarding the SAA sodium permanganate issue, Uranium T-Hoppers outside of Building X744G, and two 55-gallon containers from a 1/26/05 diesel fuel spill that were located in Building X-700. U.S. DOE personnel told the inspectors that the containers in the Contractor lay down area had been removed. Inspector Stewart discussed the problem with the Envirocare LDR forms. Specifically, that the forms did not have a wastewater/non-wasetewater box to check. Ms. Rafferty agreed to follow-up on the RCRA 6002 information.

ATTACHMENTS:

Inspection Checklists.

STATE PART B HAZARDOUS WASTE PERMIT INSPECTION CHECKLIST

DIVISION OF HAZARDOUS WASTE MANAGEMENT
OHIO EPA
March 2005

Table of Contents
U.S. DOE - Portsmouth Gaseous Diffusion Plant
04-66-0680

RCRA Inspection Checklist 1

General Conditions of Permit 2
- General Permit Compliance and Activities 2

Permit Modification, Revision, Revocation 5

Site Entry - Availability of Records 7

Recordkeeping Requirements 7
- Confidentiality 7
- Operating Record 7
- Annual Report Requirement 9
- Sampling/monitoring Recordkeeping Requirements 9
- Waste Minimization Requirements 10

Off-site Shipments/manifest Requirements 11
- Manifest Requirements/wastes Received On-site 11

Waste Analysis/waste Analysis Plan 11
- General Requirements 12
- Waste Analysis Quality Assurance Requirements 12

General Inspection Requirements 14

Security Provisions/facility Operation 15

Personnel Training 16

Required Equipment 16

Contingency Plan Requirements 17
- Emergency Procedures 17
- Emergency Authorities 18
- Emergency Coordinator 18
- Amendment of Plan 18
- Implementation of Plan 19

Contingency Plan Requirements 20
- Closure Plan/amendment 20
- Closure Activities 20

Requirements for Ignitable, Reactive or Incompatible Wastes 22

Storage of Hazardous Wastes in Containers 24
- Condition of Containers 25
- Inspections 25
- Containment System 26
- Required Aisle Space 27
- Closure and Post-closure 27
- Container Storage of Residual Waste 27

Land Disposal Restriction Requirements 28
- Prohibition Against Dilution 28
- Generator Requirements 28
- Notification/certification 29
- Storage of Land Disposal Restricted Wastes 3

OHIO PART B PERMITTED FACILITY
RCRA INSPECTION CHECKLIST

ility: U.S. DOE - Portsmouth Gaseous Diffusion Plant Ohio Permit #: 04-66-0680

Co-operator: Bechtel Jacobs Company LLC

Address: 3930 U.S. Route 23 South
Piketon, OH 45661

USEPA ID#: OH7 890 008 983
Facility Phone: 740-897-5010

County: Pike Time: 8:00 -

Inspection Date: 3/7/05 - 3/9/05

Advance notice of inspection given?____(Yes) __X_(No)
If so, how far in advance? _____

	Name	***Agency/Title***	***Phone***
Inspector(s):	Walt Francis	U.S. EPA	312-353-4921
	Melody Stewart	Ohio EPA	740-380-5256
Facility Representative(s):	~~Russell Vranicar~~ Melda Mahoney	USDOE	740-897-??
	~~Cliff Beeks~~ Chris Guillams	~~Bechtel Jacobs~~	~~740-897-3579~~
	~~Mary Williams~~	~~Bechtel Jacobs~~	~~740-897-5010~~
	~~Sandy Childers~~ Greg Simcox	~~Bechtel Jacobs~~	~~740-897-2336~~

Is facility operating as a generator? Yes __X_____ No _____

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

PERMIT STATUS

Permit Issued: March 15, 2001
Permit Effective Date: March 15, 2001
Permit Expiration Date: March 15, 2006

	STORAGE		**TREATMENT**		**DISPOSAL**
X	Container		Tank		Injection Well
	Tank		Surface Impoundment		Landfill
	Waste Pile		Incinerator		Land Application
	Surface Impoundment		Thermal Treatment		Surface Impoundment

GENERAL CONDITIONS OF PERMIT

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1. Has the expiration date of the permit passed? If so: Yes__No_X_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 _X_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? (Or upon a later date if the permittee can demonstrate good cause for late submittal.) [Condition A.6.(a)] Yes__No__ N/A _X_RMK#___

NOTE: *The permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:*

   A. The permittee has submitted a timely and complete application for a renewal permit under OAC rule 3745-50-40; and

   B. Through no fault of the permittee, a new permit has not been issued pursuant to OAC rule 3745-50-40 on or before the expiration date of the permit. [Condition A.6.(b)]

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.26] Yes_X_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? [Condition A.1.(b) and A.5] Yes__No_X_ N/A ___RMK#___

4. Have any provisions of the permit been identified as invalid? [Condition A.4.] Yes__No_X_ N/A ___RMK#___

5. Has the facility identified any instances of noncompliance with the permit, RC Chapter 3734. or the rules adopted thereunder, which may endanger human health or the environment? If so: Yes__No_X_ N/A ___RMK#___

   a. Did the facility immediately report orally the following to Ohio EPA's Emergency Response Section within 24 hours of becoming aware of the circumstance(s): [Condition A.20.(a)]

i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and — Yes__No__ N/A _X_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 or operator? — Yes__No__ N/A _X_RMK#__

B. Name, address and telephone number of the facility? — Yes__No__ N/A _X_RMK#__

C. Name and quantity of material(s) involved? — Yes__No__ N/A _X_RMK#__

D. The extent of injuries, if any? — Yes__No__ N/A _X_RMK#__

E. An assessment of the actual or potential hazard to the environment and human health outside the facility where this is applicable? — Yes__No__ N/A _X_RMK#__

F. Estimated quantity and disposition of recovered material that resulted from the incident? — Yes__No__ N/A _X_RMK#__

6. Did the permittee provide a written report to Ohio EPA's Emergency Response Section and DHWM, SEDO within five days of the time the permittee became aware of the circumstances reported in Question 5? [Condition A.21.] If so did the report contain: — Yes__No__ N/A _X_RMK#__

a. A description of the noncompliance and its cause (including exact dates and times)? — Yes__No__ N/A _X_RMK#__

b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? — Yes__No__ N/A _X_RMK#__

c. Steps taken or planned to minimize the impact on human health and the environment and to reduce and prevent recurrence of the noncompliance? — Yes__No__ N/A _X_RMK#__

Note: *The permittee need not comply with the five day written report requirement if the director, upon go cause shown by the permittee, waives that requirement and the permittee submits a written report within 15 days of the time the permittee becomes aware of the circumstances. [Condition A.21.(c)]*

7.	Has the permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8]	Yes__No__ N/A _X_RMK#__
8.	Has the permittee identified any other instances of noncompliance not provided for in Question 5?	Yes__No__ N/A _X_RMK#__
	a. If so, did the permittee report to the director within a month of the time at which the permittee is aware of such noncompliance? [Condition A.22.]	Yes__No__ N/A _X_RMK#__
	b. Do the reports provided contain the information set forth in Condition A.20?	Yes__No__ N/A _X_RMK#__
9.	Has the permittee planned any physical alterations or additions to the permitted facility?	Yes__No_X_ N/A ___RMK#__
	a. If so, has the facility provided Ohio EPA with notice of such changes? [Condition A.15]	Yes__No__ N/A _X_RMK#__

Note: *Such notification does not waive the permittee's duty to comply with the permit pursuant to Condition A.5.*

REMARKS

MIT MODIFICATION, REVISION, REVOCATION

	Has the permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.] Contingency plan update. Permit mod 11/96	Yes X No___ N/A ___RMK#___
2.	Has the permit been transferred to a new owner or operator? [Condition A.18.] If so,	Yes___No X N/A ___RMK#___
	a. Has the transfer been conducted in accordance with R.C. Chapter 3734. and the rules adopted thereunder? [Condition A.18.]; and	Yes___No___ N/A X RMK#___
	b. Before transferring ownership did the permittee notify the new owner in writing of the requirements of R.C. Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.18.]	Yes___No___ N/A X RMK#___
3.	Has the permittee submitted reports of compliance or noncompliance with, or any progress reports on the requirements contained 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 X RMK#___
4.	Has the permittee furnished relevant information which Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, or to determine compliance with the permit? [Condition A.10]	Yes X No___ N/A ___RMK#___
5.	Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10]	Yes X No___ N/A ___RMK#___
6.	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 HWFB? If so,	Yes___No X N/A ___RMK#___
	a. Has the permittee promptly submitted such facts or corrected information to the appropriate entity? [Condition A.24.]	Yes___No___ N/A X RMK#___

7.	Is the permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications to the application? [Condition A.14.(c)]	Yes X No___ N/A ___RMK#___
8.	Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14.(c)]	Yes X No___ N/A ___RMK#___

REMARKS

TE ENTRY - AVAILABILITY OF RECORDS

As specified in Condition A.11., has the permittee allowed the director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection, 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 X No___ N/A ___RMK#___

b. Have access to and copy any records required to be kept under the conditions of the permit? Yes X No___ N/A ___RMK#___

c. Inspect at reasonable times facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit? Yes X No___ N/A ___RMK#___

d. Sample, document, or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by R.C. Chapter 3734. and the rules adopted thereunder? Yes X No___ N/A ___RMK#___

RECORDKEEPING REQUIREMENTS

CONFIDENTIALITY

1. Has the permittee requested confidentiality of any information of the permit in accordance with R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.25.] Yes___No X N/A ___RMK#___

OPERATING RECORD

2. Is the permittee maintaining a written operating record at the facility as set forth in OAC rule 3745-54-73 and Condition B.22. of the permit which contains the following elements:

a. A description and the quantity of each hazardous waste received? Yes X No___ N/A ___RMK#___

b. Method(s) and date(s) of treatment, storage or disposal at the facility? Yes X No___ N/A ___RMK#___

c. The location of each hazardous waste within the facility and the quantity at each location? Yes X No___ N/A ___RMK#___

3. Is the permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents as part of its operating record: [Condition A.28.]

a. Waste analysis plan in accordance with OAC rule 3745-54-13 and the conditions of the permit? Yes X No___ N/A ___RMK#___

b. Contingency plan in accordance with OAC rule 3745-54-53 and the conditions of the permit? Yes X No___ N/A ___RMK#___

c. Closure plan in accordance with OAC rule 3745-55-12 and the conditions of the permit? Yes X No___ N/A ___RMK#___

d. Personnel training plan and records required by OAC rule 3745-54-16 and the conditions of the permit? Yes X No___ N/A ___RMK#___

e. Inspection schedules developed in accordance with OAC rules 3745-54-15 and 3745-55-74 and the conditions of the permit? Yes X No___ N/A ___RMK#___

4. Have any of the documents identified in Question #3 been revised as required by the permit? If so, Yes X No___ N/A ___RMK#___

a. Has the permittee submitted the revisions to Ohio EPA? [Condition A.28.(b)] Yes X No___ N/A ___RMK#___

b. Has the permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.28.(b)] Yes X No___ N/A ___RMK#___

5. Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from the date of inspection? [Condition A.28.(c)] Yes X No___ N/A ___RMK#___

NUAL REPORT REQUIREMENT

6. 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 and the conditions of the permit? [Condition B.25.] Yes X No___ N/A ___RMK#___

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

7. In compliance with Condition A.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 X No___ N/A ___RMK#___

   b. Individual(s) who performed the sampling or measurement? Yes X No___ N/A ___RMK#___

   c. Date(s) analyses were performed? Yes X No___ N/A ___RMK#___

   d. Individual(s) who performed the analyses? Yes X No___ N/A ___RMK#___

   e. Analytical technique(s) or method(s) used? Yes X No___ N/A ___RMK#___

   f. Results of such analyses? Yes X No___ N/A ___RMK#___

8. 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 A.12.(a)] Yes X No___ N/A ___RMK#___

9. Has Ohio EPA requested submittal of any reports or other information required by the conditions of the permit from the permittee? If so, Yes___No X N/A ___RMK#___

   a. Have the submittals been signed and certified according to OAC rules 3745-50-58(K) and 3745-50-42? [Condition A.13.] Yes___No___ N/A X RMK#___

WASTE MINIMIZATION REQUIREMENTS

10. Has the permittee submitted a Waste Minimization Report to Ohio EPA meeting the requirements of Condition A.29. of the permit within 180 days of permit journalization? Yes_X_No___ N/A ___RMK#___

    a. Following the first submittal as identified above in Question #10, has the permittee submitted biennial updates to this report as required by Condition A.29.(c)? Yes_X_No___ N/A ___RMK#___

REMARKS

*-SITE SHIPMENTS/MANIFEST REQUIREMENTS

1. Is all hazardous and mixed waste transported from the facility by a properly registered transporter of hazardous and mixed waste in accordance with all applicable laws, rules and standards? [Condition A.16.] — Yes X No ___ N/A ___ RMK#___

MANIFEST REQUIREMENTS/WASTES RECEIVED ON-SITE

2. Upon receipt of the manifests, has the permittee signed and dated each copy of the manifest? [OAC 3745-54-71(A)(1); Condition B.24.] — Yes X No ___ N/A ___ RMK#___

3. For any significant discrepancies identified upon receipt of the manifest(s): did the permittee note such discrepancies on the manifest(s) in accordance with OAC rule 3745-54-71(A)(2) and Condition B.24? — Yes ___ No ___ N/A X RMK#___

   a. Did the permittee attempt to reconcile the discrepancy? [Condition B.24.] — Yes ___ No ___ N/A X RMK#___

   b. If the discrepancy was not resolved within 15 days: did the permittee submit a report, including a copy of the manifest, to the director in accordance with OAC rule 3745-54-72(B)? [Condition B.24.] — Yes ___ No ___ N/A X RMK#___

4. Does the permittee immediately give the transporter at least one copy of the signed manifest? [OAC 3745-54-71(A)(3); Condition B.24.] — Yes X No ___ N/A ___ RMK#___

5. Does the permittee provide the generator with a copy of the manifest within 30 days of receipt of waste on-site? [OAC 3745-54-71(A)(4); Condition B.24.] — Yes X No ___ N/A ___ RMK#___

6. Does the permittee retain a copy of each manifest on-site for at least three years from the date of delivery? [OAC 3745-54-71(A)(5); Condition B.24.] — Yes X No ___ N/A ___ RMK#___

7. Has the permittee received any hazardous waste or mixed waste from off-site, other than as described in Condition B.2(b)? — Yes ___ No X N/A ___ RMK#___

WASTE ANALYSIS/WASTE ANALYSIS PLAN

GENERAL REQUIREMENTS

1. Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information which is necessary to properly treat, store or dispose of the waste in accordance with OAC Chapters 3745-54 to 3745-57 and Condition B.3 of the permit (Section C of the approved permit application)? [OAC 3745-54-13(A)(1)] — Yes X No ___ N/A ___ RMK#___

2. Since the last inspection, were any wastes generated by the facility which were unable to be characterized through process knowledge? If so, — Yes ___ No X N/A ___ RMK#___

   a. Were the waste analysis procedures described in Section C of the approved permit application followed? — Yes ___ No ___ N/A X RMK#___

3. Is the permittee following the procedures described in the approved waste analysis plan (Section C of approved permit application) and the requirements of OAC rule 3745-54-13? [Condition B.3.] — Yes X No ___ N/A ___ RMK#___

4. Is the permittee maintaining waste analysis data in the facility's operating record as required by OAC rule 3745-54-73 and Condition B.22. of the permit? — Yes X No ___ N/A ___ RMK#___

WASTE ANALYSIS QUALITY ASSURANCE REQUIREMENTS

5. Is the permittee verifying the analysis of each waste stream annually as part of its quality assurance program in accordance with SW-846? [Condition B.3.] — Yes X No ___ N/A ___ RMK#_

6. In accordance with Condition B.3. of the permit, does the permittee's quality assurance plan ensure that the permittee is, at a minimum:

   a. Maintaining property functional instruments? — Yes X No ___ N/A ___ RMK#___

   b. Using approved sampling/analytical methods? — Yes X No ___ N/A ___ RMK#___

   c. Verifying the validity of sampling and analytical procedures and performance of correct calculations? — Yes X No ___ N/A ___ RMK#___

If the permittee uses a contract laboratory to perform analyses, did the permittee inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this permit?

Yes_X_No___ N/A ___RMK#___

REMARKS

GENERAL INSPECTION REQUIREMENTS

1. Is the permittee following the inspection procedures and schedules described in Section F of the approved permit application and the requirements of OAC rule 3745-54-15? [Condition B.5.] — Yes__ No__X__ N/A ___ RMK# 1

2. Does the permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [OAC 3745-54-15(A)(1)(2)] — Yes X No___ N/A ___ RMK#___

3. 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? — Yes X No___ N/A ___ RMK#___

   a. Is the schedule kept at the facility? [OAC 3745-54-15(B)(2)] — Yes X No___ N/A ___ RMK#___

   b. Does the schedule identify the types of problems which are to be looked for during the inspection? [OAC 3745-54-15(B)(3)] — Yes X No___ N/A ___ RMK#___

   c. Does the schedule include inspection of areas subject to spills daily when in use and according to other applicable regulations when not in use? [OAC 3745-54-15(B)(4)] — Yes X No___ N/A ___ RMK#___

4. 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 X No___ N/A ___ RMK#___

5. Is the permittee maintaining records of inspections for a minimum of three years? [Condition B.5.] — Yes X No___ N/A ___ RMK#___

6. 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 X No___ N/A ___ RMK#___

   b. Signature of inspector? — Yes X No___ N/A ___ RMK#___

   c. Notation of observations made? — Yes X No___ N/A ___ RMK#___

d. Date/nature of any repairs or other remedial actions? Yes X No__ N/A ___RMK#___

SECURITY PROVISIONS/FACILITY OPERATION

1. Is the permittee complying with the security provisions of OAC rule 3745-54-14(B)(1) and B(2) and (C) and Section F of the approved permit application, including the following: [Condition B.4.]

   a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility; Yes X No__ N/A ___RMK#___

   b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility; or Yes X 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 X No__ N/A ___RMK#___

2. In accordance with OAC rule 3445-54-14(C), does the permittee have signs reading "Danger-Unauthorized Personnel Keep Out" posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? [Condition B.4.] Yes X No__ N/A ___RMK#___

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 waters? [Condition B.1.] Yes X No__ N/A ___RMK#___

REMARKS

RMK #1 - Building X-326 L Cage, inspector unable to view certain containers during weekly inspections. – Inspection was aborted.

PERSONNEL TRAINING

1. Is the facility conducting personnel training in accordance with Section H of the approved permit application and the following requirements of OAC rule 3745-54-16: [Condition B.6.]

   a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC 3745-54-16(A)(B)(C)] — Yes X 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 3745-54-16(B)? — Yes X No___ N/A ___RMK#___

   c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(B)? — Yes___No X N/A ___RMK# 1

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 X No___ N/A ___RMK#___

REQUIRED EQUIPMENT

1. Is the permittee, at a minimum, maintaining the equipment set forth in the approved permit application (Section G) at the facility? [Condition B.9.] — Yes X No___ N/A ___RMK#___

2. Is the permittee inspecting, testing, and maintaining the equipment specified in Question #1 to assure its proper operation as specified in OAC rule 3745-54-33, the inspection plans and Section G of the approved permit application? [Condition B.10.] — Yes X 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 Section G of the approved permit application? [Condition B.11.] — Yes X No___ N/A ___RMK#___

NTINGENCY PLAN REQUIREMENTS

⌐MERGENCY PROCEDURES

1. In compliance with Condition B.13.(a) of the permit, does the permittee:

   a. Familiarize the emergency response agencies likely to respond to an emergency at the facility with:

      i. The location and layout of the facility? Yes X No___ N/A ___RMK#___

      ii. Properties of hazardous waste and mixed waste managed at the facility and associated hazards? Yes X No___ N/A ___RMK#___

      iii. Places where facility personnel will normally be working? Yes X No___ N/A ___RMK#___

      iv. Entrances to and roads inside the facility? Yes X No___ N/A ___RMK#___

      v. Evacuation routes as depicted in Section G of the permit application? Yes X No___ N/A ___RMK#___

   b. Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the facility, and any further requirements imposed by the permit?; and Yes X No___ N/A ___RMK#___

   c. Familiarize local police and fire departments, local hospitals and other local emergency services with the properties of hazardous waste and mixed waste managed at the facility and the types of injuries which could result from fires, explosions or a release of hazardous wastes at the facility? Yes X No___ N/A ___RMK#___

2. Is the permittee in compliance with the requirements of OAC rule 3745-54-56 and Section G of the approved permit application regarding emergency procedures? [Condition B.20.] Yes X No___ N/A ___RMK#___

EMERGENCY AUTHORITIES

3. 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_X_ 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 _X_RMK#___

4. 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.] — Yes_X_No___ N/A ___RMK#___

5. Has the permittee notified the agencies in Question #4, in writing, within ten days of the effective date of any amendments or revisions to the Plan? [Condition B.18.(b)] — Yes_X_No___ N/A ___RMK#___

6. 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 in accordance with OAC rule 3745-54-53? [Condition B.18.(c)] — Yes_X_No___ N/A ___RMK#___

EMERGENCY COORDINATOR

7. Is the permittee in compliance with the requirements of OAC rule 3745-54-55 with regard to the emergency coordinator? [Condition B.19.] — Yes_X_No___ N/A ___RMK#___

AMENDMENT OF PLAN

8. Is the permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17.] — Yes_X_No___ N/A ___RMK#___

Note: *Also see Question #4 of RECORDKEEPING REQUIREMENTS to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.*

'LEMENTATION OF PLAN

Has there been a fire, explosion or release of hazardous waste or mixed waste or constituents at the facility since the last date of inspection as described by Condition B.14. of the permit? If so,	Yes__No_X_ 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? [Condition B.14.]	Yes__No__ N/A _X_RMK#___
b. Did the permittee collect and manage released material, emergency response material and by-products as hazardous waste or mixed waste until making a demonstration to Ohio EPA that such materials are not subject to Ohio hazardous waste rules? [Condition B.16.]	Yes__No__ N/A _X_RMK#___
c. 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 _X_RMK#___
i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23.] ***Note:*** *See also Conditions A.21. and A.22. of the permit for additional reporting/recordkeeping requirements.*	Yes__No__ N/A _X_RMK#___
d. 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? [Condition B.23.]	Yes__No__ N/A _X_RMK#___

REMARKS

CONTINGENCY PLAN REQUIREMENTS

CLOSURE PLAN/AMENDMENT

1. Is the permittee maintaining at the facility, the approved closure plan which contains the elements set forth in OAC rule 3745-55-12? [Condition B.29.] Yes X No___ N/A ___RMK#___

2. Has the permittee amended the closure plan? If so, Yes___No X N/A ___RMK#___

   a. Has the plan been amended in accordance with OAC rule 3745-55-12(C)? [Condition B.28.] Yes___No___ N/A X 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.*

CLOSURE ACTIVITIES

3. Has the permittee closed the facility? If so, Yes___No X N/A ___RMK#___

   a. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26.] Yes___No___ N/A X RMK#___

   b. Did the permittee carry-out the approved closure plan as set forth in the permit application and terms and conditions of the permit? [Condition B.26.] Yes___No___ N/A X RMK#___

   c. After receiving the final volume of hazardous waste, did the permittee remove from the facility all hazardous waste and mixed 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 X RMK#___

   d. 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 X RMK#___

   e. Did the permittee notify Ohio EPA's Southeast District Office within five working days prior to all rinseate and soil sampling? [Condition B.32.(b)] Yes___No___ N/A X 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 _X_RMK#___

REMARKS

REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

1. Is the permittee following the procedures as specified in OAC rules 3745-54-17, 3745-55-77 and Section F of the approved application when managing ignitable, reactive and/or incompatible wastes? [Conditions B.7.(a) and C.10. and C.11.] — Yes X No ___ N/A ___ RMK#___

2. Does the permittee ***not*** store incompatible waste ***except*** in accordance with OAC rules 3745-54-17(B) and 3745-55-77, and the terms and conditions of this permit? [Condition C.11.(a)] — Yes X No ___ N/A ___ RMK#___

3. Does the permittee take precautions to prevent placing hazardous waste or mixed waste in an unwashed container that previously held an incompatible waste or material? [Condition C.11.(b)] — Yes X No ___ N/A ___ RMK#___

4. Does the permittee ensure that all containers of incompatible wastes are physically separated from other incompatible wastes or materials by a wall, berm, dike, or other device in accordance with OAC rule 3745-55-77 and the Appendix to OAC rule 3745-55-99? [Condition C.11.(c)] — Yes X No ___ N/A ___ RMK#___

   a. Are all containers of aqueous hazardous acids (ph $\leq$ 2) and caustics ph $\geq$ 12.5) sorted on different pallets and physically separated in different rooms? [Condition C.11.(c)] — Yes X No ___ N/A ___ RMK#___

   b. Are aqueous acids and caustics in poly bottles, and other containers requiring nuclear criticality safety spacing physically separated in the same room by a dike? [Condition C.11.(c)] — Yes X No ___ N/A ___ RMK#___

   c. Are containers of cyanides and sodium metals being stored in rooms physically separate from other incompatible wastes or other incompatible materials? [Condition C.11.(c)] — Yes X No ___ N/A ___ RMK#___

5. Does the permittee provide electrical grounding for all containers, tanks and transport vehicles during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(b)] — Yes X No ___ N/A ___ RMK#___

	Does the permittee provide and require the use of spark proof tools during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(c)]	Yes X No___ N/A ___RMK#___
7.	Does the permittee prohibit smoking and open flames in areas where hazardous wastes are managed and post appropriate signs? [Condition B.7.(d)]	Yes X No___ N/A ___RMK#___
8.	As required by OAC rule 3745-55-76, does the permittee store containers of ignitable or reactive wastes greater than 15 meters (50 feet) away from the Portsmouth Gaseous Diffusion Plant reservation boundary? [Condition C.10.(a)]	Yes X No___ N/A ___RMK#___

REMARKS

STORAGE OF HAZARDOUS WASTES IN CONTAINERS

NOTE: *The requirements of permit 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.*

1.	Is the permittee storing in containers, only those wastes as specified in Section A of the Part B permit application? [Condition C.1.(a), C.2.]	Yes X No___ N/A ___RMK#___
2.	Does the permittee limit the total quantity of containerized waste in the container storage area to 133,000 gallons at any given time in the permitted container areas, located in building X-326 and no more than 5,456,000 gallons at any given time in the permitted storage areas located in building X-7725? [Condition C.1.(a)]	Yes X No___ N/A ___RMK#___

NOTE: *For the purposes of compliance with the capacity limitation of the permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity. For example, a 55-gallon drum will be considered to be holding 55 gallons of waste, regardless of the actual quantity stored in the drum. [Condition C.1.(b)]*

3.	When accumulating waste within the permitted X-7725 and X-326 container storage area, does the permittee ensure that the total amount of waste (both > 90 days and < 90 days) does not exceed the maximum container storage inventory established under Condition C.1.? [Condition C.1.(c)]	Yes X No___ N/A ___RMK#___
4.	Are hazardous wastes subject to regulation by the permit stored only at the designated container storage area described in the approved permit application? (See Section D of the permit application) [Condition C.1.(a)]	Yes X No___ N/A ___RMK#___
5.	Is each container stored clearly marked to identify its contents and the date each period of accumulation/storage begins? (See Section D of the permit application) [Condition C.3.]	Yes X No___ N/A ___RMK#___
6.	Does the permittee store hazardous waste in the types of containers described in Section D of the approved permit application? [Condition C.1.(a)]	Yes X No___ N/A ___RMK#___

NDITION OF CONTAINERS

Are containers holding hazardous wastes in good condition? [Condition C.3.] — Yes X No ___ N/A ___ RMK#___

a. If not, (e.g., severe rusting, structural defects) did the permittee transfer the hazardous waste from such a container to a container that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit and OAC rule 3745-55-71? [Condition C.3.] — Yes ___ No ___ N/A X RMK#___

9. 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 C.4.] — Yes X No ___ N/A ___ RMK#___

10. Is storage conducted in the container storage containment system as described in Condition C.1. of the permit and Section D of the approved permit application? [Condition C.5.(a)] — Yes X No ___ N/A ___ RMK#___

11. 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 C.5.(b)] — Yes X No ___ N/A ___ RMK#___

12. Are lab-pack wastes handled in compliance with applicable storage requirements? [Condition C.5.(c)] — Yes X No ___ N/A ___ RMK#___

13. Are lab-pack wastes packaged in drums containing absorbent material that is compatible with the wastes? [Condition C.5.(d)] — Yes X No ___ N/A ___ RMK#___

INSPECTIONS

14. Is the permittee inspecting the container area weekly in accordance with OAC rules 3745-54-15, and 3745-54-73 and the approved inspection schedule (Section F) to detect leaking containers and deterioration of containers and the containment system? [Condition C.8.] — Yes X No ___ N/A ___ RMK#___

a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken? [Condition C.8.] — Yes X No ___ N/A ___ RMK#___

b. On days when containerized waste are added or removed to and/or from any of the permitted areas for storage, does the permittee conduct inspections as described in Section F of the approved Part B permit application and maintain the inspection results in the facility operating record? [Condition C.8.] Yes_X_No___ N/A ___RMK#___

CONTAINMENT SYSTEM

15. Does the permittee maintain the containment system as described in Section D of the approved Part B permit application, including: [Condition C.6.] Yes_X_No___ N/A ___RMK#___

a. Sufficient design to contain 10% of the total volume of the containers or the volume of the largest container, whichever is greater? [Condition C.6.(b)] Yes_X_No___ N/A ___RMK#___

b. A system which is free of gaps and sufficiently impervious to contain leaks and spills? Yes_X_No___ N/A ___RMK#___

c. Equipped with a coating which is compatible with each waste stored in the area? Yes_X_No___ N/A ___RMK#___

d. *For those wastes which are deemed incompatible with liner material:* Has the permittee installed a separate secondary containment structure within the existing structure which is equipped with a compatible liner? Yes___No___ N/A _X_RMK#___

16. Has the permittee had a spill or leak of wastes or an accumulation of precipitation in the containment system? If so, Yes___No_X_ N/A ___RMK#___

a. Are spilled or leaked wastes and accumulated precipitation removed from the sump or collection area in a timely manner? [Condition C.6.(c)] Yes___No___ N/A _X_RMK#___

b. Does removal of spilled/leaked wastes and accumulated precipitation occur within 24 hours from the time the spill or leak waste is discovered? [Condition C.6.(c)] Yes___No___ N/A _X_RMK#___

QUIRED AISLE SPACE

...	Is the permittee maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in the event of an emergency to any area of the facility as required by OAC rule 3745-54-35? [Condition B.12.]	Yes X No___ N/A ___RMK#___

CLOSURE AND POST-CLOSURE

18.	At closure of the container storage area, did the permittee remove all hazardous waste, hazardous waste residues, mixed waste and mixed waste residues from the containment system, in accordance with the procedures set forth in the approved closure plan (Section I of the permit application)? [Condition C.13.(a)]	Yes___No___ N/A _X_RMK#___
19.	During closure, if the permittee could not demonstrate that all contaminated soils could be removed, did the permittee close the unit and perform post-closure care following a plan approved by Ohio EPA? [Condition C.13.(b)]	Yes___No___ N/A _X_RMK#___

CONTAINER STORAGE OF RESIDUAL WASTE

20.	Is the permittee complying with the provisions of Section C-2E of the application as amended pursuant to Condition B.2.(b) of this permit?	Yes X No___ N/A ___RMK#___

LAND DISPOSAL RESTRICTION REQUIREMENTS

PROHIBITION AGAINST DILUTION

1. Has the permittee updated the annual Federal Facility Compliance Act Schedule? [OAC rule 3745-270-50; Condition B.36.] — Yes X No ___ N/A ___ RMK#___

2. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [OAC rule 3745-270-40 through 49; Condition B.36.(c)] — Yes ___ No X N/A ___ RMK#___

   a. As a substitute for adequate treatment to achieve compliance with LDR treatment standards? — Yes ___ No ___ N/A X RMK#___

   b. To circumvent the effective date of a prohibition (e.g., to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)? — Yes ___ No ___ N/A X RMK#___

   c. To otherwise avoid a prohibition in OAC rule 3745-270-30 through -39? — Yes ___ No ___ N/A X RMK#___

   d. To otherwise avoid a prohibition imposed by Section 3004(d) of RCRA? — Yes ___ No ___ N/A X RMK#___

NOTE: *If the answer to any of Questions 2(a) through 2(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of OAC rule 3745-270-03 [Condition B.36.]. Dilution of wastes is permissible under some conditions. See OAC rule 3745-270-03(B).*

GENERATOR REQUIREMENTS

3. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No ___ N/A ___ RMK#___

   a. ***For determinations based solely on knowledge of the waste***: Is supporting data used to make this determination being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No ___ N/A ___ RMK#___

   b. ***For determinations based upon analytical testing***: Is a copy of waste analysis data being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No ___ N/A ___ RMK#___

Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g., wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [OAC rule 3745-270-07; Condition B.36.(e)] Yes~~X~~ No X N/A ___RMK# 1

5. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [OAC rule 3745-270-07(A); Condition B.36.(e)] Yes X No___ N/A ___RMK#___

6. Does the entity generate any listed waste(s) which are restricted from land disposal? If so, Yes X No___ N/A ___RMK#___

   a. Do such wastes also exhibit hazardous waste characteristics as identified in OAC rules 3745-51-20 to 3745-51-24? Yes X No___ N/A ___RMK#___

   b. ***For listed wastes which also exhibit a characteristic*:** Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [OAC rule 3745-270-09(A)] Yes X No___ N/A ___RMK#___

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC rule 3745-270-09(B)].*

NOTIFICATION/CERTIFICATION

7. ***For wastes that do not meet treatment standards:*** Has the generator submitted a one-time written notice to the treatment/storage facility receiving the wastes, that wastes being received do not meet treatment standards? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No___ N/A ___RMK#___

   If so, does the notice including the following:

   a. EPA hazardous waste number? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No___ N/A ___RMK#___

   b. Appropriate treatment standard for the waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No___ N/A ___RMK#___

c. The manifest number associated with the first shipment of waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No___ N/A ___RMK#___

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No___ N/A ___RMK#___

e. Applicable wastewater/non-wastewater category [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes ~~X~~ No X N/A ___RMK#1

f. For hazardous debris, list the contaminants subject to treatment, as described in paragraph (B) of OAC rule 3745-270-45; and an indication that these contaminants are being treated to comply with OAC rule 3745-270-45. — Yes X No___ N/A ___RMK#___

g. For contaminated soil list the constituents subject to treatment as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. — Yes X No___ N/A ___RMK#___

8. ***For wastes that meet treatment standards:*** Does the generator submit a one-time written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes___No___ N/A X RMK#___

If so, does the notice/certification including the following:

a. EPA hazardous waste identification number? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes___No___ N/A X RMK#___

b. The corresponding treatment standards and applicable prohibitions for the waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes___No___ N/A X RMK#___

c. The manifest number associated with the shipment of waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes___No___ N/A X RMK#___

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes___No___ N/A _X_RMK#___

e. Is the certification signed by the generator or an authorized representative? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes___No___ N/A _X_RMK#___

f. For contaminated soil list the constituents subject to treatment as described as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. — Yes___No___ N/A _X_RMK#___

9. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years? [OAC rule 3745-270-07(A)(8); Condition B.36.(j)] — Yes_X_No___ N/A ___RMK#___

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

NOTE: *The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate LDR wastes that do not meet treatment standards in tanks or containers. A LQG who stores LDR wastes on-site for greater than 90 days becomes a operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.*

NOTE: *The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [OAC rule 3745-270-50(E); 40 CFR 268.50(e)]*

10. Is the owner/operator storing LDR restricted wastes in containers? If so, is each container marked with the following information in accordance with OAC rule 3745-270-50(A)(2)(a) [Condition B.36(l)] — Yes_X_No___ N/A ___RMK#___

a. The identification of the contents? — Yes_X_No___ N/A ___RMK#___

b. The date which accumulation began? — Yes_X_No___ N/A ___RMK#___

NOTE: *A TSD facility may store LDR wastes on-site for the purpose of accumulating a sufficient amount waste for proper recovery, treatment or disposal. [OAC rule 3745-270-50(B)]. During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.*

11. Are LDR wastes being stored at the facility for greater than one year? If so,

    a. Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [OAC rule 3745-270-50(B); Condition B.36(m)] Yes X No___ N/A ___RMK#___

Rmk
I (1) Shipments to Envirocare UTAH, LDR form - no [illegible]/ non-waste designation

R REQUIREMENTS

Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] **If so**: Yes X No ❑ N/A ___RMK#___

a. **For determinations based solely on knowledge of the waste:** Is supporting data retained on-site? [3745-270-07(A)(6)] Yes X No ❑ N/A ___RMK#___

b. **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes X No ❑ N/A ___RMK#___

2. Has the generator determined each Ohio EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2), see Table 1] Yes X No ❑ N/A ___RMK#___

3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes ~~X~~ No ☒ N/A ___RMK# 1

4. Does the generator generate a characteristic hazardous waste? **If so:** Yes X No___ N/A ___RMK#___

a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes X No ❑ N/A ___RMK#___

NOTE: *If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.*

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] **If so:** Yes X No___ N/A ___RMK#___

a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes X No ❑ N/A ___RMK#___

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]*

6. Has the generator **correctly** determined if restricted wastes meet or exceed treatment standards? [3745-270-07(A)(1)] Yes X No ❑ N/A ___RMK#___

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

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

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

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes ☐ No___ N/A X RMK#___

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] **If so:** Yes___ No X N/A ___RMK#___

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

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

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

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

    a. Has the facility complied with 3745-270-04? Yes ___ No ☐ N/A X RMK#___

REMARKS

(1) LDR Forms for shipments to Envirocare Leaked wastewater / non-hazardous

TIFICATION AND CERTIFICATION REQUIREMENTS

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

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

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

REMARKS

LARGE QUANTITY UNIVERSAL WASTE HANDLER INSPECTION CHECKLIST

mpany: U.S. Department of Energy-Portsmouth Gaseous Diffusion Plant USEPA ID#: OH7 890 008 983

Street: US Route 23 S City: Piketon

County: Pike State: Ohio ZIP: 45661

Mailing Address PO Box 700, Piketon, Ohio 45661-0700
(IF DIFFERENT FROM ABOVE)

Telephone: (740)897-5010 Fax: ( )

Owner/ Operator: Federal Government/Co-Operator Bechtel Jacobs Company LLC
(IF DIFFERENT FROM ABOVE)

Street:

City: State: Zip:

Inspection Date(s): 3/7/05 - 3/9/05 Time(s): 8:00 am -

Inspection Announced? ____ YES __X__ NO If so, how much advance notice given? ____

Inspectors: Melody Stewart, OEPA and Walt Francis, U.S. EPA

Facility Rep(s): Melda Rattney
Chris Guilliams
Greg Wright
Rosemary Rathbone

WASTE MANAGEMENT ACTIVITY	
X	Containers
	Tank(s)
	Other (specify)

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

LARGE QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

GENERAL REQUIREMENTS

1. Has the LQUWH obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)] — Yes ___ No ☐ N/A ☑ RMK#___

PROHIBITIONS

2. Did the LQUWH dispose of universal waste? [3845-273-31(A)] — Yes ☑ No___ N/A ___RMK#___

3. Did the LQUWH dilute or treat universal waste, except when responding to releases or by managing specific wastes as provided in OAC 3745-273-33? [3745-273-31(B)] — Yes ☐ No___ N/A ☑ RMK#___

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES:

4. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)] — Yes ___ No ☐ N/A ☑ RMK#___

5. If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? — Yes ___ No ☐ N/A ☑ RMK#___

6. Does the LQUWH conduct any of the following activities:

   a. Sort batteries by type? — Yes ☑ No___ N/A ___RMK#___

   b. Mix battery types in one container? — Yes___ No ☑ N/A ___RMK#___

   c. Discharge batteries to remove the electric charge? — Yes___ No ☑ N/A ___RMK#___

   d. Regenerate used batteries? — Yes___ No ☑ N/A ___RMK#___

   e. Disassemble them into individual batteries or cells? — Yes___ No ☑ N/A ___RMK#___

   f. Remove batteries from consumer products? — Yes ☑ No___ N/A ___RMK#___

   g. Remove the electrolyte from the battery? — Yes___ No ☑ N/A ___RMK#___

If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-33(A)(2)] — Yes ☐ No___ N/A X RMK#___

If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)] — Yes ___ No ☐ N/A X RMK#___

a. If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)] — Yes ___ No ☐ N/A X RMK#___

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)] — Yes ___ No ☐ N/A X RMK#___

8. Are the battery(ies) or container(s) of batteries located with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-34(A)] — Yes ___ No ☒ N/A ___ RMK# 1

UNIVERSAL WASTE PESTICIDES

9. Does the LQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-33(B)(1)] — Yes ___ No ☐ N/A X RMK#___

10. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-33(B)(2)] — Yes ___ No ☐ N/A X RMK#___

11. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 66-992, except for paragraph (C) of 3745-66-97; rule 3745-66-991 and 3745-66-992 of the OAC met? [3745-273-33(B)(3)] — Yes ___ No ☐ N/A X RMK#___

12. Is pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-33(B)(4)] — Yes ___ No ☐ N/A X RMK#___

13. Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)] — Yes ___ No ☐ N/A X RMK#___

14. Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)]

Yes ___ No ☐ N/A ✓ RMK#___

UNIVERSAL WASTE THERMOSTATS

15. Are thermostats that show evidence of leakage, spillage or damage that could cause leaks, properly contained? [3745-273-33(C)(1)]

Yes ___ No ☐ N/A ✓ RMK#___

16. If the thermostats are contained, are the containers closed, structurally sound, compatible with contents of the thermostats and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(C)(1)]

Yes ___ No ☐ N/A ✓ RMK#___

17. If the mercury-containing ampules are removed, does the LQUWH: [3745-273-33(C)(1)]

a. Remove the ampules in a manner to prevent breakage and is the removal done over a containment device? [3745-273-33(C)(2)(a)(b)]

Yes ___ No ☐ N/A ✓ RMK#___

b. Have a clean-up system readily available to transfer spilled material to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-33(C)(2)(c)(d)]

Yes ___ No ☐ N/A ✓ RMK#___

c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-33(C)(2)(e)]

Yes ___ No ☐ N/A ✓ RMK#___

d. Ensure employees are thoroughly familiar with proper waste handling and emergency procedures? [3745-273-33(C)(2)(f)]

Yes ___ No ☐ N/A ✓ RMK#___

e. Ensure removed ampules are stored in closed, non-leaking containers that are in good condition? [3734-273-33(C)(2)(g)]

Yes ___ No ☐ N/A ✓ RMK#___

f. Pack removed ampules in containers with packing material to prevent breaking during storage, handling and transportation? [3745-273-33(C)(2)(h)]

Yes ___ No ☐ N/A ✓ RMK#___

18. If mercury or clean-up residues resulting from spills or leaks or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-33(C)(3)(a)] — Yes ___ No ☐ N/A X RMK#___

a. If the waste is characteristic, was it managed in compliance with 3745-50 through 3745-69? (*The handler is considered the generator of the mercury, residues, and/or other waste and is subject to Chapter 3745-52)* [3745-273-33(C)(3)(b)] — Yes ___ No ☐ N/A X RMK#___

b. If the mercury, residues and/or other waste are not hazardous, are they managed in compliance with applicable law? [3745-273-33(C)(3)(c)] — Yes ___ No ☐ N/A X RMK#___

19. Are the thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)" [3745-273-34] — Yes ___ No ☐ N/A X RMK#___

ACCUMULATION TIME

20. Is the waste accumulated for less than one year? [3745-273-35(A)] — Yes X No___ N/A ___RMK#___

a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on handler to demonstrate) [3745-273-35(B)] — Yes ___ No ☐ N/A X RMK#___

NOTE: ***Accumulation is defined as date generated or date received from another handler.***

21. Has the length of time the universal waste has been accumulated documented by ***one*** of the following: [3745-273-35(C)] — Yes X No ☐ N/A ___RMK#___

a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-35(C)(1)] — Yes X No ___ N/A ___RMK#___

b. Marking or labeling the individual item of universal waste with the date that it became a waste or was received? [3745-273-35(C)(2)] — Yes___ No X N/A ___RMK#___

c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-35(C)(3)] — Yes___ No X N/A ___RMK#___

d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-35(C)(4)] — Yes___ No X N/A ___RMK#___

e. Placing the universal waste in a specific accumulation area and identifying the earliest that any universal waste in the area became a waste or was received? [3745-273-35(C)(5)] — Yes___ No X N/A ___RMK#___

f. Any other method which clearly demonstrates the length of time the universal waste has been accumulated from the date it became a waste or is received? [3745-273-35(C)(6)] — Yes___ No X N/A ___RMK#___

EMPLOYEE TRAINING

22. Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36] — Yes X No ❑ N/A ___RMK#___

RESPONSE TO RELEASES

23. Were releases of universal waste and other residues immediately contained? [3745-273-37(A)] — Yes ___ No ❑ N/A X RMK#___

24. Was the released material characterized? [3745-273-37(B)] — Yes ___ No ❑ N/A X RMK#___

25. If the released material was a hazardous waste, was it managed as required in OAC 3745-50 through 3745-69? *(If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52)* [3745-273-37(C)] — Yes ___ No ❑ N/A X RMK#___

OFF-SITE SHIPMENTS

NOTE: ***If a LQUWH self-transports wastes, then the handler must comply with the Universal Waste transporter requirements.***

26. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)] — Yes X No ❑ N/A ___RMK#___

NOTE: ***LQUWHs are prohibited to send waste to any other facility.***

27. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-38(C)] — Yes X No ☐ N/A ___ RMK#___

28. Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)] — Yes X No ☐ N/A ___ RMK#___

29. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following: — Yes ___ No ☐ N/A X RMK#___

a. Receive the waste back? [3745-273-38(E)(1)] — Yes___ No___ N/A X RMK#___

b. Agree to where shipment will be sent? [3745-273-38(E)(2)] — Yes___ No___ N/A X RMK#___

30. If a handler rejects a partial or full load from another handler, does the receiver handler contact the originating handler and discuss one of the following: — Yes ___ No ☐ N/A X RMK#___

a. Sending the waste back to originating handler? [3745-273-38(F)(1)] — Yes___ No___ N/A X RMK#___

b. Sending the shipment to a destination facility? [3745-273-38(F)(2)] — Yes___ No___ N/A X RMK#___

31. If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)] — Yes ___ No ☐ N/A X RMK#___

32. If the handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-38(H)] — Yes ___ No ☐ N/A X RMK#___

TRACKING UNIVERSAL WASTE SHIPMENTS

33. Are universal waste received from another handler? If so: Yes___ No X N/A ___RMK#___

a. Is a record of each shipment kept? [3745-273-39(A)] Yes ___ No ☐ N/A X RMK#___

NOTE: ***This record can be in the form of a log, invoice, manifest, bill of lading, or other shipping document. This also applies to question No. 35(a).***

34. Does the record include the following:

a. Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)] Yes ___ No ☐ N/A X RMK#___

b. Quantity of each type of universal waste? [3745-273-39(A)(2)] Yes ___ No ☐ N/A X RMK#___

c. Date received? [3745-273-39(A)(3)] Yes ___ No ☐ N/A X RMK#___

35. Is universal waste shipped to another handler? If so: Yes___ No___ N/A X RMK#___

a. Is a record of each shipment kept? [3745-273-39(B)] Yes ___ No ☐ N/A X RMK#___

36. Does the record include the following?

a. Name and address of universal waste handler, destination facility, or foreign destination? [3745-273-39(B)(1)] Yes ___ No ☐ N/A X RMK#___

b. Quantity of each type of universal waste? [3745-273-39(B)(2)] Yes ___ No ☐ N/A X RMK#___

c. Date shipped? [3745-273-39(B)(3)] Yes ___ No ☐ N/A X RMK#___

37. Are records kept for three years? [3745-273-39(C)(1)(2)] Yes X No ☐ N/A ___RMK#___

EXPORTS

38. Is waste being sent to a foreign destination? If so: Yes___ No X N/A ___RMK#___

a. Does the large quantity handler comply with primary exporter requirements in OAC rules 3745-52-53 and 3745-52-57, and paragraphs (A)(1) - (A)(6) and (B) of 3745-52-56? [3745-273-40(A)] Yes ___ No ☐ N/A X RMK#___

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA "Acknowledgment of Consent" 37845-52-50 to -52-57? [3745-273-40(B)]

Yes ___ No ☐ N/A ___ RMK#___

c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)]

Yes ___ No ☐ N/A ___ RMK#___

REMARKS

(1) Lead acid Batteries sent off-site for Recycling -

USED OIL INSPECTION CHECKLIST

ıpany: U.S. DOE-Portsmouth Gaseous Diffusion Plant EPA I.D.: OH7 890 008 983

Street: 3930 U.S. Route 23 South City: Piketon

County: Pike State: Ohio Zip: 45661

Mailing Address: (IF DIFFERENT FROM ABOVE)

Telephone: 740-897-5010 Fax:

Owner/ Operator: (IF DIFFERENT FROM ABOVE)

Street:

City: State: Zip:

Inspection Date(s): March 7 - 9, 2005 Time(s): 8:00 am - 5:00 pm

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

	Name	Affiliation	Telephone
Inspectors:	Walt Francis	U.S. EPA	312-353-4921
	Melody Stewart	Ohio EPA	740-380-5256
Facility Rep(s):	Melda Rafferty	U.S. DOE	

USED OIL MANAGEMENT ACTIVITY

X Generator/CollectionCenter/Aggregation	____ Marketer
____ Transporter/Transfer Facility	____ Off-Spec Burner
____ Processor/Re-Refiner	____ Other (specify)
____ No Generation	

PROHIBITIONS

1. Is used oil being managed in a surface impoundment or waste pile? If so: — Yes__No_X_ 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 _X_ RMK#___

2. Is used oil being used as a dust suppressant? [3745-279-12(B)] — Yes ❑ No _X_ 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 X 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 X N/A ___RMK#___

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 X 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 X 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 _X_ 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 X 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 X No ❑ N/A ___RMK#___

   b. Contained the release? — Yes X No ❑ N/A ___RMK#___

   c. Cleaned up and properly managed the used oil and other materials? — Yes X No ❑ N/A ___RMK#___

   d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? — Yes X No ❑ N/A ___RMK#___

10. Does the generator burn used oil in used fired space heaters? [3745-279-23] If so: — Yes__No_X_ N/A ___RMK#___

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 X RMK#___

b. Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour? Yes ___ No ☐ N/A X RMK#___

c. Are the combustion gases from heater vented to the ambient air? Yes ___ No ☐ N/A X 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 X 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 X No ☐ N/A ___RMK#___

REMARKS

USED OIL TRANSPORTER AND TRANSFER FACILITIES

16. Does the used oil transporter process used oil? [3745-279-41(A)] If so: Yes__No__ N/A ___RMK#___

    Is the used oil transporter in compliance with the requirements for processors/re-refiners in 3745-279-50 to 3745-279-59 (except as provided in 3745-279-41(B) and (C))? [3745-279-41(A)] Yes ___ No ❑ N/A ___RMK#___

17. Has the used oil transporter notified Ohio EPA or U.S. EPA and obtained an EPA ID#? [3745-279-42(A)] Yes ___ No ❑ N/A ___RMK#___

18. Has the used oil transporter delivered all used oil to:

    a. Another used oil transporter that has an EPA ID#? [3745-279-43(A)(1)] Yes ___ No ❑ N/A ___RMK#___

    b. A used oil processing/re-refining facility that has an EPA ID#? [3745-279-43(A)(2)] Yes ___ No ❑ N/A ___RMK#___

    c. An off-spec used oil burning facility that has an EPA ID#? [3745-279-43(A)(3)] Yes ___ No ❑ N/A ___RMK#___

    d. An on-spec used oil burning facility? [3745-279-43(A)(4)] Yes ___ No ❑ N/A ___RMK#___

19. Has the used oil transporter complied with all applicable USDOT regulations (49 CFR 171 to 180)? [3745-279-43(B)] Yes ___ No ❑ N/A ___RMK#___

20. Has the used oil transporter had a discharge of used oil? If so: Yes__No__ N/A ___RMK#___

    Did they take the appropriate action as outlined in 3745-279-43(C)? Yes ___ No ❑ N/A ___RMK#___

21. Has the used oil transporter determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? [3745-279-44(A)] Yes ___ No ❑ N/A ___RMK#___

22. Does the transporter retain all records of analyses and information used to comply with 3745-279-44 for at least three years? [3745-279-44(A)] Yes ___ No ❑ N/A ___RMK#___

23. Does the owner/operator of a used oil transfer facility:

    a. Stored used oil in tanks, containers, or units subject to regulation under 3745-54 to 3745-57 or 3745-65 to 3745-69? [3745-279-45(B)] Yes ___ No ❑ N/A ___RMK#___

b. Stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-45(C)] Yes ___ No ❑ N/A ___RMK#___

c. Provide secondary containment for containers used to store used oil as required by 3745-279-45(D)? [3745-279-45(D)] Yes ___ No ❑ N/A ___RMK#___

d. Provide secondary containment for existing aboveground tanks required by 3745-279-45(E)? [3745-279-45(E)] Yes ___ No ❑ N/A ___RMK#___

e. Provide secondary containment for new aboveground tanks as required by 3745-279-45(F)? [3745-279-45(F)] Yes ___ No ❑ N/A ___RMK#___

f. Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil?" [3745-279-45(G)] Yes ___ No ❑ N/A ___RMK#___

g. Upon detection of a release of used oil: [3745-279-45(H)]

i. Stopped the release? Yes ___ No ❑ N/A ___RMK#___

ii. Contained the release? Yes ___ No ❑ N/A ___RMK#___

iii. Cleaned up and managed the used oil and other materials? Yes ___ No ❑ N/A ___RMK#___

iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No ❑ N/A ___RMK#___

24. Does the used oil transporter keep a record of each shipment of used oil? [3745-279-46(A)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the generator, transporter or processor/re-refiner who provides the used oil for transport? [3745-279-46(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include the EPA ID# of the generator, transporter or processor/re-refiner (if applicable) that provides the used oil for transport? [3745-279-46(A)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include the quantity of used oil accepted? [3745-2679-46(A)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include the date of acceptance? [3745-279-46(A)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Does each record include the signature of a representative of the generator, transporter, processor/re-refiner that provided the used oil for transport? [3745-279-46(A)(5)] Yes ___ No ❑ N/A ___RMK#___

25. Does the used oil transporter keep a record of each shipment of used oil that is delivered to another used oil transporter, burner, processor/re-refiner, or disposal facility? [3745-279-46(B)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the receiving facility or transporter? [3745-279-46(B)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include the EPA ID# of the receiving facility or transporter? [3745-279-46(B)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include the quantity of used oil delivered? [3745-279-46(B)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include the date delivered? [3745-279-46 Yes ___ No ❑ N/A ___RMK#___

e. Does each record include the signature of a representative of the receiving facility or transporter (intermediate rail transporters are not required to sign a record of delivery)? [3745-279-46(B)(5)] Yes ___ No ❑ N/A ___RMK#___

26. Does the used oil transporter who exports used oil to a foreign country comply with 3745-279-46(B)(1) to (B)(4)? [3745-279-46(C)] Yes ___ No ❑ N/A ___RMK#___

27. Does the used oil transporter retain all records required under 3745-279-46 for at least three years? [3745-279-46(D)] Yes ___ No ❑ N/A ___RMK#___

28. Does the used oil transporter generate residues from the storage or transportation of used oil? Yes___No___ N/A ___RMK#___

If so, are they managed as specified in 3745-279-10(E)? [3745-279-47] Yes ___ No ❑ N/A ___RMK#___

REMARKS

USED OIL STANDARDS FOR PROCESSORS AND RE-REFINERS

29. Has the used oil processor and/or re-refiner notified Ohio EPA or U.S. EPA and obtained an EPA ID#? [3745-279-51(A)] Yes ___ No ❑ N/A ___RMK#___

30. Does the owner/operator of a used oil processing or re-refining facility comply with the following:

a. Is the facility maintained and operated to minimize the possibility of fire, explosion, or release of used oil? [3745-279-52(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Is the facility equipped with the equipment in 3745-279-52(A)(2), if necessary? [3745-279-52(A)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Are all communication systems, alarm systems, fire protection equipment, spill control equipment, and decontamination equipment tested and maintained as required? [3745-279-52(A)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Is there access to communication or alarm system(s)? [3745-279-52(A)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Is the required aisle space being maintained? [3745-279-52(A)(5)] Yes ___ No ❑ N/A ___RMK#___

f. Are arrangements maintained with local authorities? [3745-279-52(A)(6)] Yes ___ No ❑ N/A ___RMK#___

31. Has the owner/operator of a used oil processing and re-refining facility complied with the following requirements:

a. Has a contingency plan been developed? [3745-279-52(B)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does the contingency plan contain the requirements of 3745-279-52(B)(2)? Yes ___ No ❑ N/A ___RMK#___

c. Have copies and revisions been maintained and submitted to all local authorities? [3745-279-52(B)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Is the contingency plan reviewed and amended whenever one of the events in 3745-279-52(B)(4) occurs? [3745-279-52(B)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Is an emergency coordinator on the premises or on call at all times to meet the requirements of 3745-279-52(B)(5) and (6)? Yes ___ No ❑ N/A ___RMK#___

32. Does the used oil processor/re-refiner determine whether the total halogen content of the used oil being managed at the facility is above or below 1000 ppm? [3745-279-53(A)] Yes ___ No ❑ N/A ___RMK#___

33. Does/has the used oil processor/re-refiner:

a. Only store used oil in tanks, containers or units subject to regulation under 3745-54 to 3745-57 or 3745-65 to 3745-69? [3745-279-54(A)] Yes ___ No ❑ N/A ___RMK#___

b. Only store used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-54(B)] Yes ___ No ❑ N/A ___RMK#___

c. Provide secondary containment for containers as required by 3745-279-54(C)? [3745-279-45(C)] Yes ___ No ❑ N/A ___RMK#___

d. Provide secondary containment for existing aboveground tanks as required by 3745-279-54(D)? Yes ___ No ❑ N/A ___RMK#___

e. Provide secondary containment for new aboveground tanks as required by 3745-279-54(E)? Yes ___ No ❑ N/A ___RMK#___

f. Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil" [3745-279-54(F)] Yes ___ No ❑ N/A ___RMK#___

g. Upon detection of a release of used oil, done the following in accordance with 3745-279-54(G):

i. Stopped the release? Yes ___ No ❑ N/A ___RMK#___

ii. Contained the release? Yes ___ No ❑ N/A ___RMK#___

iii. Cleaned up and managed the used oil and other materials? Yes ___ No ❑ N/A ___RMK#___

iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No ❑ N/A ___RMK#___

h. Performed closure of aboveground tanks and containers in accordance with 3745-279-54(H)? Yes ___ No ❑ N/A ___RMK#___

34. Has the owner/operator of the used oil processing/re-refining facility developed, kept on-site, and followed a written waste analysis plan which meets the requirements in 3745-279-53? Yes ___ No ❑ N/A ___RMK#___

35. Does the used oil processor/re-refiner keep a record of each shipment of used oil accepted for processing/re-refining? [3745-279-56(A)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the transporter who delivered the used oil to the processor? [3745-279-56(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include the name and address of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include the EPA ID # of the transporter who delivered the used oil to the processor/re-refiner? [3745-279-56(A)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include the EPA ID # (if applicable) of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Does each record include the quantity of used oil accepted? [3745-279-56(A)(5)] Yes ___ No ❑ N/A ___RMK#___

f. Does each record include the date of acceptance? [3745-279-56(A)(6)] Yes ___ No ❑ N/A ___RMK#___

36. Does the used oil processor/re-refiner keep a record of each shipment of used oil that is shipped to a used oil burner, processor/re-refiner, or disposal facility? [3745-279-56(B)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the transporter who delivers the used oil to the burner, processor/re-refiner or disposal facility [3745-279-56(B)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include the name and address of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include the EPA ID# of the transporter that delivers the used oil to the burner, processor/re-refiner or disposal facility? [3745-279-56(B)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include the EPA ID# of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Does each record include the quantity of used oil shipped? [3745-279-56-(B)(5)] Yes ___ No ❑ N/A ___RMK#___

f. Does each record include the date of shipment? [3745-279-56(B)(6)] Yes ___ No ❑ N/A ___RMK#___

37. Does the used oil processor/re-refiner retain all records required under 3745-279-56 for at least three years? [3745-279-56(C)] Yes ___ No ❑ N/A ___RMK#___

38. Does the owner/operator keep an operating record at the facility? [3745-279-57(A)(1)] Yes ___ No ❑ N/A ___RMK#___

a. Does the operating record include records and results of used oil analysis performed as described in the analysis plan required under 3745-279-55? [3745-279-57(A)(2)(a)] Yes ___ No ❑ N/A ___RMK#___

b. Are summary reports and details of all incidents that require implementation of the contingency plan as specified in 3745-279-52(B) maintained in the operating record? [3745-279-57(A)(2)(b)] Yes ___ No ❑ N/A ___RMK#___

39. Does the used oil processor/re-refiner report to the director in the form of a letter, on a biennial basis by March 1, the following information:

a. The EPA ID#, name and address of the processor/re-refiner? [3745-279-57(B)(1)] Yes ___ No ❑ N/A ___RMK#___

b. The calendar year covered by the report? [3745-279-57(B)] Yes ___ No ❑ N/A ___RMK#___

c. The quantities of used oil accepted for processing/re-refining and the manner in which the used oil is processed/re-refined, including the specific processes employed? [3745-279-57(B)] Yes ___ No ❑ N/A ___RMK#___

40. Does the used oil processor/re-refiner, who initiates a shipment of used oil off-site, use a used oil transporter that has a EPA ID#? [3745-279-58] Yes ___ No ❑ N/A ___RMK#___

41. Does the used oil processor/re-refiner generate residues from the storage, processing or re-refining of used oil? [3745-279-59] Yes ___ No___ N/A ___RMK#___

If so, are the residues managed as specified in 3745-279-10(E)? [3745-279-59] Yes ___ No ❑ N/A ___RMK#___

REMARKS

STANDARDS FOR USED OIL BURNERS WHO BURN OFF-SPEC USED OIL FOR ENERGY RECOVERY

42. Is off-spec used oil fuel burned for energy recovery only in industrial furnaces identified in 3745-50-10, or boilers as defined in 3745-50-10 and identified in 3745-279-61(A)(2), or hazardous waste incinerators? [3745-279-61(A)] — Yes ___ No ❑ N/A ___RMK#___

43. Does the used oil burner process used oil? [3745-279-61(B)] — Yes___No___ N/A ___RMK#___

If so, have they complied with the requirements for processors in 3745-279-50 to 3745-279-59? [3745-279-61(B)] — Yes ___ No ❑ N/A ___RMK#___

44. Has the used oil burner notified Ohio EPA or U.S. EPA and obtained an EPA ID#? [3745-279-62(A)] — Yes ___ No ❑ N/A ___RMK#___

45. Does the used oil burner determine whether the total halogen content of the used oil being managed at the facility is above or below 1000 ppm? [3745-279-63(A)] — Yes ___ No ❑ N/A ___RMK#___

46. Does the used oil burner retain records of all analyses conducted or information used to comply with 3745-279-63 for at least three years? [3745-279-63(D)] — Yes ___ No ❑ N/A ___RMK#___

47. Does the used oil burner:

a. Only store used oil in tanks, containers or units subject to regulation under 3745-54 to 3745-65 to 3745-69? [3745-279-64(A)] — Yes ___ No ❑ N/A ___RMK#___

b. Only stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-64(B)] — Yes ___ No ❑ N/A ___RMK#___

c. Provided secondary containment for containers as required by 3745-279-64(C)? [3745-279-64(C)] — Yes ___ No ❑ N/A ___RMK#___

d. Provided secondary containment for existing aboveground tanks as required by 3745-279-64(D)? — Yes ___ No ❑ N/A ___RMK#___

e. Provided secondary containment for new aboveground tanks as required by 3745-279-64(E)? — Yes ___ No ❑ N/A ___RMK#___

f. Labeled all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil?" [3745-279-64(F)] — Yes ___ No ❑ N/A ___RMK#___

g. Upon detection of a release of used oil, done the following in accordance with 3745-279-64(G):

i. Stopped the release? Yes ___ No ❑ N/A ___RMK#___

ii. Contained the release? Yes ___ No ❑ N/A ___RMK#___

iii. Cleaned up and managed the used oil and other materials? Yes ___ No ❑ N/A ___RMK#___

iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No ❑ N/A ___RMK#___

48. Does the used oil burner keep a record or each used oil shipment accepted for burning? [3745-279-65(A)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-65(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include the name and address of the generator or processor/re-refiner who sent the used oil to the burner? [3745-279-65(A)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include the EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-65(A)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include the EPA ID# (if applicable) of the generator or processor/re-refiner who sent the used oil to the burner? [3745-279-65(A)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Does each record include the quantity of the used oil accepted? [3745-279-65(A)(5)] Yes ___ No ❑ N/A ___RMK#___

f. Does each record include the date of acceptance? [3745-279-65(A)(6)] Yes ___ No ❑ N/A ___RMK#___

49. Are the records described in 3745-279-65(A) maintained for at least three years? [3745-279-65(B)] Yes ___ No ❑ N/A ___RMK#___

50. Prior to accepting the first shipment of off-spec used oil fuel from a generator, transporter, or processor/re-refiner, does the used oil fuel burner provide to the generator, transporter, or processor/re-refiner a one-time written and signed notice certifying that:

a. The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-279-66(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. The burner will burn the used oil only in an industrial furnace or boiler identified in 3745-279-61? Yes ___ No ❑ N/A ___RMK#___

51. Is the certification maintained for at least three years from the date the burner last received a shipment of off-spec used oil from the generator, transporter, or processor/re-refiner? [3745-279-66(B)] Yes ___ No ❑ N/A ___RMK#___

52. Does the used oil burner generate residues from the storage or burning of used oil? [3745-279-67] Yes___No___ N/A ___RMK#___

If so, are the residues managed as specified in 3745-279-10(E)? [3745-279-67] Yes ___ No ❑ N/A ___RMK#___

REMARKS

STANDARDS FOR USED OIL MARKETERS

53. Does the used oil fuel marketer initiate shipments of off-spec used oil only to a used oil burner that has an EPA ID# and burns the used oil in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-71]

Yes ☒ No ☐ N/A ___ RMK# 1

54. Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil meets the specification for used oil fuel under 3745-279-11 keep copies of analyses of the used oil (or other information used to make the determination) for at least three years? [3745-279-72(B)]

Yes ☒ No ☐ N/A ___ RMK#___

55. Has the used oil marketer notified Ohio EPA or U.S. EPA and obtained an EPA ID#? [3745-279-73(A)]

Yes ☒ No ☐ N/A ___ RMK#___

56. Does the used oil marketer keep a record of each shipment of used oil directed to a used oil burner? [3745-279-74(A)]

Yes ☒ No ☐ N/A ___ RMK#___

a. Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-74(A)(1)]

Yes ☒ No ☐ N/A ___ RMK#___

b. Does each record include the name and address of the burner who receives the oil? [3745-279-74(A)(2)]

Yes ☒ No ☐ N/A ___ RMK#___

c. Does each record include the EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-74(A)(3)]

Yes ☒ No ☐ N/A ___ RMK#___

d. Does each record include the EPA ID# of the burner? [3745-279-74(A)(4)]

Yes ☒ No ☐ N/A ___ RMK#___

e. Does each record include the quantity of the used oil shipped? [3745-279-74(A)(5)]

Yes ☒ No ☐ N/A ___ RMK#___

f. Does each record include the date of shipment? [3745-279-74(A)(6)]

Yes ☒ No ☐ N/A ___ RMK#___

57. Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil meets the fuel specifications under 3745-279-11 keep a record of each shipment of used oil to an on-spec used oil burner? [3745-279-74(A)(6)]

Yes ☒ No ☐ N/A ___ RMK#___

a. Does each record include the name and address of the facility receiving the shipment? [3745-279-74(B)(1)]

Yes ☒ No ☐ N/A ___ RMK#___

b. Does each record include quantity of used oil fuel delivered? [3745-279-74(B)(2)] Yes X No ☐ N/A ___RMK#___

c. Does each record include date of shipment or delivery? [3745-279-74(B)(3)] Yes X No ☐ N/A ___RMK#___

d. Does each record include a cross-reference to the record of used oil analysis or other information used to make the determination that the used oil meets the specification as required in 3745-279-72(A)? [3745-279-74(B)(4)] Yes X No ☐ N/A ___RMK#___

58. Are the records described in 3745-279-74(A) and (B) maintained for at least three years? [3745-279-74(C)] Yes X No ☐ N/A ___RMK#___

59. Before the used oil generator, transporter or processor/re-refiner directs the first shipment of off-spec used oil to a burner, does he obtain a one time written and signed notice from the burner certifying that:

a. The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-279-75(A)(1)] Yes X No ☐ N/A ___RMK#___

b. The burner will burn the off-spec used oil only in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-75(A)(2)] Yes X No ☐ N/A ___RMK#___

60. Is the certification maintained for at least three years from the date the last shipment of off-spec used oil was shipped to the burner? [3745-279-75(B)] Yes X No ☐ N/A ___RMK#___

E:\USDOEPortsmouthChecklists\USDOEusedoil.wpd

REMARKS

(1) used oil from U.S. DOE is picked up by USEC, and then sent off-site.

RCRA HAZARDOUS WASTE GENERATOR INSPECTION CHECKLIST

npany: U.S. Department of Energy - Portsmouth Gaseous Diffusion Plant EPA ID#: OH7 890 008 983

Street: 3930 US Route 23 South City: Piketon

County: Pike State: Ohio Zip: 45661

Mailing Address: PO Box 700, Piketon, Ohio 45661-0700

(If different from above)

Telephone: 740-897-5010 Fax #: _____

Owner/ Operator: Federal Government/Co-Operator Bechtel Jacobs Company LLC

(If different from above)

Street: _____

City: _____ State: Ohio Zip: _____

Inspection Date(s): 3/7/2005 - 3/9/2005 Time(s): 8:00 am -

Inspection Announced? _____ Yes ___X___ NO If so, how much advance notice given? _____

	Name	Affiliation	Telephone
Inspectors:	Melody Stewart	OEPA	740-380-5256
	Walt Francis	U.S. EPA	312-353-4921
Facility Representative:	~~Cliff Beeks~~ Melda McEuen	~~BJC~~ W.J.V.E	~~740-897-3579~~
	~~Mary Williams~~ Chris Williams	~~BJC~~	~~740-897-5010~~
	Rosemary Richmond	BJC	740-897-2967
	~~Sandy Childers~~ Greg Thomas	~~BJC~~	~~740-897-2336~~

Complete All Other Applicable Checklists

Generator Classification	Waste Management Activity
_____ Conditionally Exempt SQG (CESQG)	___X___ Containers
_____ Small Quantity Generator (SQG)	_____ Tank(s)
___X___ Large Quantity Generator (LQG)	_____ Land Disposal Requirements (LDR)
_____ No Generation	_____ Used Oil
	___X___ Universal Waste
	_____ Other

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

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

PROCESS DESCRIPTION

Historically, the main function of the DOE-PORTS facility was to enrich uranium for military use (nuc submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U. from the U238 isotope in UF6 feedstock which contains 0.711% U235. However, in 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). USDOE retained ownership of the ongoing site environmental restoration program as well as two permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and are leased by USEC. These include decontamination of equipment and uranium recovery (X-705 Bldg.); chemical cleaning of equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); photo and printing lab (X-100); vehicle repair (X-750); coal pile runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in DOE owned and permitted storage facilities. Waste generated by DOE from the environmental restoration is also stored in these facilities. USEC ceased the enrichment process in May 2001.

WASTE MANAGEMENT, GENERATION AND AMOUNT

Uranium contaminated hazardous wastes (mixed waste) which were/are generated by USEC and DOE are stored on-site in DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of TSDs in the U.S. which could accept mixed waste, and a May 1991 DOE moratorium on off-site waste shipment. A large percentage of the waste generated at PORTS is DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in DOE-owned storage areas. During the past year, numerous shipments of hazardous waste were manifested off-site by both DOE and USEC. This is due to an increase in treatment capacity at off-site commercial treatment facilities and DOE treatment facilities, the lifting of the moratorium, and the execution of the site treatment plans for DOE and USEC. DOE sends some waste off-site (to U.S. DOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to DOE for storage in the interim prior to their final disposal.

Hazardous

The DOE Part B permit lists numerous hazardous waste codes for wastes that are generated by the above processes and the environmental restoration. These are stored in drums ranging in size from 30 to 110 gallon capacity, 5 gallon containers, 20 gallon lab packs, 5' cans, 4'x4'x6' boxes, 4'x4'x8' boxes, polybottles and laboratory bottles.

Nonhazardous

A wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes.

HAZARDOUS WASTE MANAGEMENT UNITS

The following DOE-owned permitted storage facilities were inspected during the CEI:

✓ -X-7725 Container Storage Facility
✓ -X-326 Container Storage Facility

In addition, DOE-owned and operated HWMUs and SAAs were inspected in the following buildings:

-X-326 -X-622
-X-7725 -X-624
-X-623 ~~X-3012~~
-X-333 -X-330
~~-X-622T~~ -X-747H
~~X-3346~~
- X-735A X-752, X-345, X-627, X-700

Other Areas - X-744G Uranium Management Center

REGULATORY/ENFORCEMENT HISTORY

As a result of violations of state and federal hazardous waste regulations found during the 1987, 1988, and 1989 OEPA RCRA inspections, USDOE and OEPA entered into a Consent Decree governing restoration of the environment at DOE-PORTS. This decree includes a requirement that DOE close the X-701B, X-749, X-231B, and X-616 units within specific timeframes. The X-749, X-616 and X-231B units have now been closed. X-701B is yet to be closed.

On October 4, 1995, DFFOs were signed which allowed DOE to store LDR wastes in excess of one year, so long as waste is being stored in compliance with the orders and an approved site treatment plan. These orders supercede the May 18, 1993, DFFOs.

On February 24, 1998, DOE, LMES and Ohio signed DFFOs and a Consent Order regarding past violations and the management of DUF6 and LiOH.

On March 18, 1999, DOE and Ohio EPA signed DFFOs. These DFFOs provide exemptions to DOE and integrate the following unclosed units into the CMS/CMI process: X-749, X-231B, X-701C, X701B, X-230J7, and X-744Y.

A RCRA Permit was issued to DOE and its current co-operator, Bechtel Jacobs, for the X-7725 and X-326 storage facilities on March 15, 2001.

POLLUTION PREVENTION

Note to the Inspector: This checklist has been developed to help the division in gathering general informat about the pollution prevention (P2) practices that the company may have initiated or attempted to initiate. The checklist is also used to:

- Facilitate P2 discussions;
- Identify barriers to P2;
- Define the P2 universe;
- Identify the need for future P2 initiatives;
- Identify partnership opportunities; and
- Link companies with better P2 resources.

As a prelude to completing this checklist the inspector should use the following list of questions as a way to initiate a dialogue concerning P2:

1. Have you tried to reduce the volume of waste (hazardous and nonhazardous) that you generate?

2. What is the largest waste stream that you generate?

3. How important would it be to you to eliminate that waste stream?

4. Does your company understand the reduced regulatory burden and cost saving benefits that eliminating or reducing a waste stream can have?

5. Could you use better housekeeping practices to reduce the amount of waste that you generate?

If the company responds with one of the answers below, the appropriate box should be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided or in the remarks section.

1. Has the company undertaken any P2 activities to reduce the amount of hazardous waste generated? Yes ___ No___N/A ___RMK#___

   a. ***If so,*** what has the company done to minimize hazardous waste generation?

   - ❑ A change in the process resulting in less waste.
   - ❑ A change in the product resulting in less waste.
   - ❑ Use of fewer and less toxic hazardous raw materials.
   - ❑ Better operations/improved housekeeping.
   - ❑ On-site recycling/reuse of hazardous materials.
   - ☒ Sending waste off-site for recycling/reuse.
   - ❑ Other activities (specify): _____

   b. ***If so,*** what hazardous wastes have been addressed?

   - ❑ Solvents
   - ❑ Paint related wastes

- ☐ Industrial process wastes (sludges, slags, contaminated waste waters, etc)
- ☐ Contaminated oils/hydraulic fluids
- ☐ Off-spec chemicals
- ☒ Fluorescent light bulbs
- ☒ Used batteries
- ☐ Shop rags
- ☐ Other (specify): _____

c. ***If not,*** why hasn't the company considered P2?

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

2. Does the company plan to do P2 activities in the future? Yes X No ___ N/A ___RMK#___

3. Would the company be interested in receiving additional information from Ohio EPA about P2? Yes X No___ N/A ___RMK#___

4. Did you give the company information about P2 during the inspection? Yes X No___ N/A ___RMK#___

5. Would the company like a P2 assessment? Yes___ No X N/A ___RMK#___

If the company would like a P2 assessment done at their facility, the inspector must give the company representative a copy of the <u>Pollution Prevention Assessments for Hazardous Waste Generators</u> document and discuss it with them.

6. If the company does not want a P2 assessment, why not? Company has program in place.

REMARKS

LARGE QUANTITY GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] — Yes X No ☐ N/A ___ RMK#___

2. Has the generator obtained an identification number? [3745-52-12] — Yes X No ☐ N/A ___ RMK#___

3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41] — Yes X No ☐ N/A ___ RMK#___

WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? If so: — Yes___ No X N/A ___ RMK#___

   a. Has the generator notified U.S. EPA of export/import activity? [3745-52-53] — Yes ___ No ☐ N/A X RMK#___

   b. Has the generator complied with special manifest requirements? [3745-52-54] — Yes ___ No ☐ N/A X RMK#___

   c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] — Yes ___ No ☐ N/A X RMK#___

   d. Has an annual report been submitted to U.S. EPA? [3745-52-56] — Yes ___ No ☐ N/A X RMK#___

   e. Are export related documents being maintained on-site? [3745-52-57] — Yes ___ No ☐ N/A X RMK#___

GENERATOR CLOSURE REQUIREMENTS

5. Has the generator closed any <90-day accumulation unit(s) since the date of the last inspection? If so: — Yes___ No X N/A ___ RMK#___

   a. Describe the unit(s) which the generator has closed.
   X-7725 Area A, M, M1, P3, 4C, 4B, 4E

   b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] — Yes ___ No ☐ N/A X RMK#___

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

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

REMARKS

MANIFEST REQUIREMENTS

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

Are you aware of what the statement that you sign on the manifest says? Yes X No___

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

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

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

2. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] — Yes X No ❑ N/A ___RMK#___

NOTE: ***U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]***

3. Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)] — Yes X No ❑ N/A ___RMK#___

NOTE: ***The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].***

4. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: — Yes___ No X N/A ___RMK#___

   a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] — Yes ___ No ❑ N/A X RMK#___

5. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)] — Yes X No ❑ N/A ___RMK#___

6. Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not: — Yes X No • N/A ___RMK#___

   a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)] — Yes ___ No ❑ N/A Ø RMK#___

b. If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]

Yes ___ No ☐ N/A X RMK#___

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

Yes X No ☐ N/A ___RMK#___

REMARKS

PERSONNEL TRAINING

1. Does the generator keep records required by 3745-65-16(D) including:

   a. Job titles, as they relate to hazardous waste management, and the name of each employee filling each job? Yes ✓ No ☐ N/A ___ RMK#___

   b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position? Yes ✓ No ☐ N/A ___ RMK#___

   c. Type and amount of both introductory and continuing training to be given to each person filling a position? Yes ✓ No ☐ N/A ___ RMK#___

   d. Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)? Yes ✓ No ☐ N/A ___ RMK#___

NOTE: ***If the facility's business practices precludes written job titles/descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be used to document that all necessary employees have been trained.***

2. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to their positions? [3745-65-16(A)(2) Yes ✓ No ☐ N/A ___ RMK#___

3. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]

   a. Emergency procedures? Yes ✓ No ☐ N/A ___ RMK#___

   b. Emergency equipment? Yes ✓ No ☐ N/A ___ RMK#___

   c. Emergency systems? Yes ✓ No ☐ N/A ___ RMK#___

4. Does emergency training described in 3(a), (b) and (c) above include, *where applicable*: [3745-65-16(A)(3)(a-f)

   a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? Yes ✓ No ☐ N/A ___ RMK#___

b. Key parameters for automatic waste feed cut-off systems? Yes X No ☐ N/A ___RMK#___

c. Communication or alarm system? Yes X No ☐ N/A ___RMK#___

d. Response procedures for fire/explosions? Yes X No ☐ N/A ___RMK#___

e. Response to groundwater contamination incidents? Yes X No ☐ N/A ___RMK#___

f. Shutdown procedures? Yes X No ☐ N/A ___RMK#___

5. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes X No ☐ N/A ___RMK#___

6. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes X No ☐ N/A ___RMK#___

7. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes X No ☐ N/A ___RMK#___

8. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)] Yes X No ☐ N/A ___RMK#___

9. Are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes X No ☐ N/A ___RMK#___

10. ***Optional***: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifests, etc.

Job Performed	Name of Employee	Date(s)Trained
	Greg Utrecht	
Waste Handler	J. Cowen	Eky
	Jeremy Davis	
	Ross Cassely	

REMARKS

CONTINGENCY PLAN

1. Does the generator have a contingency plan which describes the following: [3745-65-52(A) through (F)]

   a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? — Yes ☒ No ☐ N/A ___ RMK#___

   b. Arrangements/agreements with emergency authorities? [3745-65-37] — Yes ☒ No ☐ N/A ___ RMK#___

   c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? — Yes ☒ No ☐ N/A ___ RMK#___

   d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? — Yes ☒ No ☐ N/A ___ RMK#___

   e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary? — Yes ☒ No ☐ N/A ___ RMK#___

NOTE: ***If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]***

2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] — Yes ☒ No ☐ N/A ___ RMK#___

3. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)(B)] — Yes ☒ No ☐ N/A ___ RMK#___

4. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] — Yes ☒ No ☐ N/A ___ RMK#___

EMERGENCY COORDINATOR

5. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] — Yes ☒ No ☐ N/A ___ RMK#___

NOTE: ***The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan***

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes___ No_✓_ N/A ___RMK#___

   a. Was the contingency plan implemented? [3745-65-51(B)] Yes ___ No ☐ N/A _✓_RMK#___

   b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes ___ No ☐ N/A _✓_RMK#___

   c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes ___ No ☐ N/A _✓_RMK#___

NOTE: ***OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.***

REMARKS

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

1. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] — Yes ☑ No ☐ N/A ___ RMK#_

2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]

   a. Internal alarm system? — Yes ☑ No ☐ N/A ___ RMK#___

   b. Emergency communication device? — Yes ☑ No ☐ N/A ___ RMK#___

   c. Portable fire control, spill control and decon equipment? — Yes ☑ No ☐ N/A ___ RMK#___

   d. Water of adequate volume/pressure? — Yes ☑ No ☐ N/A ___ RMK#___

3. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] — Yes ☑ No ☐ N/A ___ RMK#___

4. Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33] — Yes ☑ No ☐ N/A ___ RMK#___

5. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32)*? [3745-65-34] — Yes ☑ No ☐ N/A ___ RMK#___

6. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] — Yes ☑ No ☐ N/A ___ RMK#___

7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] — Yes ☑ No ☐ N/A ___ RMK#___

   a. Where authorities have declined to enter into arrangements/agreements, has the generator documented such a refusal? [3745-65-37(B)] — Yes ___ No ☐ N/A ☑ RMK#___

REMARKS

GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)] — Yes ☐ No ✓ N/A ___ RMK#___

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

2. Does the generator ensure that satellite accumulation area(s):

   a. Are at or near a point of generation? — Yes ✓ No ☐ N/A ___ RMK#___

   b. Are under the control of the operator of the process generating the waste? — Yes ✓ No ☐ N/A ___ RMK#___

   c. Do not exceed a total of 55 gallons of hazardous waste? — Yes ✓ No___ N/A ___ RMK#___

   d Do not exceed one quart of acutely hazardous waste at any one time? — Yes ✓ No ☐ N/A ___ RMK#___

   e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? — Yes ✓ No ☐ N/A ___ RMK#___

NOTE: ***The 55 gallon limit applies to the area itself, and not to each individual waste stream accumulated in the area. The inspector should refer to Ohio EPA's November 1994 Guidance on the Location of Satellite Accumulation Areas.***

3. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so: — Yes___ No ✓ N/A ___ RMK#___

   a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? — Yes ___ No ☐ N/A ✓ RMK#___

   b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? — Yes ___ No ☐ N/A ✓ RMK#___

USE AND MANAGEMENT OF CONTAINERS

4. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] — Yes ✓ No ☐ N/A ___ RMK#___

5. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes X No ☐ N/A ___RMK#___

6. Are hazardous wastes stored in containers which are:

   a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes X No ☐ N/A ___RMK#___

   b. In good condition? [3745-66-71] Yes X No ☐ N/A ___RMK#___

   c. Compatible with wastes stored in them? [3745-66-72] Yes X No ☐ N/A ___RMK#___

   d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes X No ☐ N/A ___RMK#___

7. Is the container accumulation area(s) inspected weekly? [3745-66-74] (*Note location in general information section of checklist)* Yes X No ☐ N/A ___RMK#___

   a. Are inspections recorded in a log or summary? [3745-66-74] Yes X No ☐ N/A ___RMK#___

8. For ignitable and/or reactive hazardous waste(s):

   a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes X No ☐ N/A ___RMK#___

   b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] Yes X No ☐ N/A ___RMK#___

PRE-TRANSPORT REQUIREMENTS

9. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] Yes X No ☐ N/A ___RMK#___

10. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes X No ☐ N/A ___RMK#___

11. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes X No ☐ N/A ___RMK#___

REMARKS

Waste, Pesticides and Toxics Division

Type of Document:
- ☐ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☒ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action

Facility Name : **United States Department of Energy - Portsmouth Diffusion Plant**

Facility Location: **3930 US Route 23 South**

City: **Piketon** **State:** **Ohio**

U.S. EPA ID# **OH7 890 008 983**

Assigned Staff **W. Francis** **Phone:** **312-353-4921**

Name	Signature	Date
Author **W. Francis**	W.	3/14/05
Regional Counsel	----------	
Section Chief **P. Little**	P Little	3/14/05
Branch Chief	----------	

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
   Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 15 2005

REPLY TO THE ATTENTION OF DE-9J

Mr. William E. Murphie
Manager
U.S. Department of Energy
Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

Mr. John Meersman
Manager of Projects
Bechtel Jacobs Company LLC
P.O. Box 900
Piketon, Ohio 45661

Re: Letter of Acknowledgment
RCRA Compliance Evaluation Inspection
U.S. Department of Energy - Gaseous Diffusion Plant
Piketon, Ohio
OH7 890 008 983

Dear Messrs. Murphie and Meersman:

On November 15, 2004, the United States Environmental Protection Agency (U.S. EPA) issued U.S. Department of Energy Portsmouth Gaseous Diffusion Plant a Notice of Violation (NOV) which identified a violation of the Ohio Administrative Code and a Resource Conservation and Recovery Act (RCRA) Permit violation at the Piketon, Ohio facility.

U.S. EPA received your December 13, 2004, responses to the November 15, 2004, NOV.

This letter is to inform you that U.S. EPA has reviewed your responses and determined that additional enforcement action need not be taken at this time.

It is our understanding, that in the future when declaring a chemical product a RCRA hazardous waste that U.S. DOE and Bechtel Jacobs personnel will create a less than 90 day accumulation area or transfer the material to Building X-7725 for storage.

This position does not limit your liability for compliance with all the applicable provisions of the Resource Conservation and Recovery Act, as amended. Your hazardous waste management operations will continue to be evaluated by U.S. EPA and the Ohio Environmental Protection Agency (OEPA) in the future.

Recycled/Recyclable . Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

If you have any questions regarding this letter, please contact Walt Francis of my staff at (312) 353-4921.

Sincerely yours,

Paul Little, Chief
Compliance Section #2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

cc: Melody Stewart, OEPA-Southeast District Office

Waste, Pesticides and Toxics Division

Type of Document:
- ☒ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action

Facility Name : U.S. Department of Energy Portsmouth Gaseous Diffusion Plant

Facility Location: 3930 U.S. Route 23 South

City: Piketon **State:** Ohio

U.S. EPA ID# OH7 890 008 983

Assigned Staff W. Francis **Phone:** 312-353-4921

Name	Signature	Date
Author **W. Francis**	W. F	11/1/04
Regional Counsel **J. Cha**	JAMES CHA CONCUR VIA E-MAIL	11/9/04
Section Chief **P. Little**		
Branch Chief	----------	

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
   Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

0177 2725
0177 2701

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

DE-9J

NOV 15 2004

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William E. Murphie
Manager
Portsmouth/Paducah Project Office
U.S. Department of Energy
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

Mr. John Meersman
Manager of Projects
Bechtel Jacobs Company LLC
P.O. Box 900
Piketon, Ohio 45661

Re: Notice of Violation
RCRA Compliance Inspection
U.S. Department of Energy
Portsmouth Gaseous Diffusion Plant
Piketon, Ohio
OH7 890 008 983

Dear Messrs. Murphie and Meersman:

On August 9 and 10, 2004, representatives of the United States Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) inspected the U.S. Department of Energy (U.S. DOE) Portsmouth Gaseous Diffusion Plant located near Piketon, Ohio. The purpose of the inspection was to evaluate compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection checklists for your reference.

Based on information provided by U.S. DOE and Bechtel Jacobs personnel, review of records, and personal observations by the inspectors, U.S. EPA finds that U.S. DOE is in violation of the following requirements of the Ohio Administrative Code (OAC) and the United States Code of Federal Regulations (CFR):

Recycled/Recyclable . Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

1) A generator may accumulate as much as fifty-five gallons of hazardous waste or one quart of acutely hazardous waste listed in paragraph E of rule 3745-51-33 of the OAC in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit and without complying with the requirements of OAC Rule 3745-52-34(A). See, OAC §§ 3745-52-34 (C)(1) [40 CFR §§ 262.34(c)(1)].

During the inspection of Building X-3346, the inspectors observed a 55-gallon satellite accumulation (SAA) container that was dated 6/18/04. The waste material was identified by Bechtel Jacobs personnel as a 40% solution of Liquox and a 40% solution of potassium permanganate, with an RFD # 3957 and a D001 hazardous waste code. Bechtel Jacobs personnel stated that the material was used in Building X-701B. The SAA container of hazardous waste that the inspectors observed in Building X-3346 was not at or near the point of generation or under the control of the operator and should have been designated a less than 90 day container accumulation area. It is our understanding that the container that was observed in Building X-3346 has been transferred to X-7725 for storage. Therefore, U.S. DOE failed to comply with OAC Rule 3745-52-34(C)(1) [40 C.F.R. § 262.34(c)(1)], and was therefore required to comply with the requirements of OAC Rule 3745-52-34(A) [40 C.F.R. § 262.34(a)].

2) The U.S. DOE-Portsmouth RCRA Permit, Module C - Container Storage, Section C.8, Inspection Schedules and Procedures (OAC Rule 3745-54-15 and 3745-54-73) specifies that the Permitee shall inspect the container storage area in accordance with the approved inspection schedule contained in Section F of the Part B permit application, to detect leaking containers and deterioration of containers and the containment system caused by corrosion, or other factors. The Part B permit application in Section F-2A(2) specifies that Building X-7725 and Building X-326 storage units are to be inspected by facility personnel on a weekly basis. The Permitee shall note the results of these inspections in the inspection log along with any remedial actions taken.

During the inspection of Building X-326 L Cage, the inspectors observed several instances where containers were stored in such a way that they could not be seen during inspections. Some of the containers were below the metal stand such that you could not see the actual container. The inspectors asked if the container was lifted up for visual inspection during the weekly inspections. U.S. DOE Portsmouth personnel said no, that the Materials Handlers Group was responsible for labeling and may lift the container out of the metal stand. This is a violation of the inspection requirements set forth in the U.S. DOE-Portsmouth RCRA Permit because the permit requires that each container itself be inspected for integrity.

In addition, during the inspection of the Uranium Management Center, Building X-744G, the inspectors observed over 100 uranium trioxide hoppers stored outside under a canopy. U.S. EPA and OEPA understand that this material has been stored at U.S. DOE-Portsmouth since the

year 2000, and each T-Hopper contains approximately 5.4 metric tons of material. U.S. EPA and OEPA have reviewed the 2003 T-Hopper Report. The 2003 T-Hopper Report states that this "surplus" material was generated at U.S. DOE - Hanford and shipped to the U.S. DOE - Portsmouth facility for storage. The data summary sheet includes information on the concentration of chromium in the uranium trioxide, which is listed as a minimum of 34.2 mg/kg to a maximum of 171 mg/kg. In your response to this letter, please provide all documents confirming that this material is suitable for sale, or has been sold as blend stock grade uranium trioxide, all documents and other information on how this material is handled or treated before being used, and also include any documentation that U.S. DOE has in its possession that demonstrates that the T-Hopper material would not be characteristically hazardous for chromium. In addition, please confirm that this material is not being accumulated speculatively (see OAC 3745-51-02(C)(4) [40 CFR 261.2(b)(8)]).

Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a), U.S. EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above requirements.

You should submit your response to Walt Francis, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604. In addition, please submit a copy of your response to Melody Stewart at the OEPA Southeast District Office, 2195 Front Street, Logan, Ohio 43138.

If you have any questions regarding this letter, please contact Walt Francis of my staff at (312) 353-4921.

Sincerely yours,

Michael Brodie for

Paul Little, Chief
Compliance Section # 2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosure

cc: Melody Stewart, OEPA-Southeast District Office

INSPECTION REPORT

GENERAL INFORMATION:

U.S. Department of Energy
Portsmouth Gaseous Diffusion Plant
3930 U.S. Route 23 South
PO Box 700
Piketon, Ohio 45661-0700

OH7 890 008 983

Date of Inspection - August 9th & 10th, 2004

U.S. EPA RCRA Inspector - Walt Francis
OEPA RCRA Inspector - Melody Stewart

U.S. DOE - Russell Vranicar

Bechtel Jacobs - Cliff Beeks
Mary Williams
Sandy Childers
Rosemary Richmond

Ownership - Federal Government

Type of inspection - CEI-LQG and Container Storage

SAA's and RCRA Container Storage areas were inspected.

Active Satellite Accumulation Areas

X-622	Northeast corner of process area
X-622T	Inside west wall
X-624	East side of process area
X-326	DMSA 1, Column F2
X-330	DMSA 7, Process Building, Column L71
X-333	DMSA 13, Process Building, Column Ux48
X-3012	South side Maintenance area, West Paint Room
X-747H	East end of X-752
X-3346	Supply Room, southeast portion of X-3346

Active 90 Day Accumulation Areas

X-623	Northeast Corner of Process Area

Permitted Container Storage

X-326 L Cage Storage in F cans.
X-7725 First floor and fourth floor areas.

As part of the inspection we visited/toured:
Monday 8/9/2004:

1) X-326 SAA - One 55-gallon SAA with D006/D009/D008, and PCBs;

2) X-326 L Cage - Met Jeremy Davis - Wastren
- RFD #6047-7 1/19/89, D018 mixed-waste;
- RFD F872824/F861493 - Orange labels utilized instead of hw sticker information;
- Row 5, containers below top of F-Can holder;
- Material Handler Group - Actually moves containers not Wastren personnel.
Last shipment out of L-Cage March 2004;

3) X-326 RCRA Permitted Areas 1-5 - No waste in storage, weekly inspections are performed;

4) X-330 - SAA area contained one 55-gallon container of drip leg material and PCBs;

5) X-333 - One 55-gallon container of D006/D009/D008 with a date 2/4/04, PCB troughing oil containing heavy metals;

6) X-622T - One 55-gallon SAA container of F001 bag filters, and PPE. Inspectors observed a broken bag of carbon on ground near Building X-622T;

7) X-623 - 90 Day Area - 7/18/04 F001 Plastic/PPE
7/27/04 Carbon/Plastic/PPE
6/24/04 F001 Waste TCE
7/27/04 Carbon
SAA Area - Waste TCE;

8) X-744G - Uranium Management Center
Uranium Trioxide Hoppers - Discussed speculative accumulation, see DOE documents;
Black 55-gallon container #225761 - Not waste;
Metal box labeled fluorescent lamps - Wrong label;

9) X-622 - 55-gallon container of F001 Plastic/PPE/Filters;

10) X-624 - 55-gallon container SAA F001

11) X-747H - 55-gallon container of used aerosols;

12) X-3346 - 55-gallon container of Liquox containing 40% Sodium Permanganate RFD #3957, generated as excess chemical, labeled as D001 with a date of 6/18/04;

13) X-3012 - 55-gallon container of used aerosols/dirty rags, ni-cd batteries, used other batteries, and fluorescent lamps;

14) X-7725 - RFD #39265-2 Sludge/Water 7/10/96 F001;
RFD #36573-2 Concrete >50 ppm PCBs, 3/23/96 D006/D006;
RFD #36596-1 Incinerator Ash 9/22/95 D005/D006;
RFD #10034-6 10/16/87 D002 (Area 4A);
RFD #43402-1 10/1/98, D001/D002 (Area P);
RFD #10026-3 3/3/92, D009 Area Q;
Scrubber Water and Citrojet Clean 7/15/04, D008 5 totes 2834 pounds each (Area G);
RFD #40857-1 10/29/92, D001/D008/D009/F005, F003, Sludge from paint shop (Area H);
RFD #4345-1 Observed 55-gallon containers labeled hazardous waste and non-reg waste containing oil (Row 15);
RFD #6009-1 6/4/91 D018/F003.

Records Review

1) Training Records - Lew Goidell, Emergency Coordinator as of 10/21/02, training OK, Cliff Beeks training OK; Inspection logs - performed by Jeremy Davis and Ross Cassidy, OK;

2) Operating Record - OK, RFD database;

3) Hazardous Waste Annual Report - OK, sent to OEPA;

4) Manifests - Note: In several instances volume crossed out and hand written on manifest. See 9/30/03 shipment of D003/D001 waste to Onyx, Menomonee Falls, Wisconsin. Check if permitted to accept these waste codes. Also check on Specialty transporter TNR 000 011 247 as transporter, see 3/30/04 manifest.

6) Contingency plan - OK;

7) Waste analysis check (RFD#s)-
39265-2
36573-2
36596-1

10034-6
43402-1
10026-3
40857-1
4345-1
6009-1

8) Weekly inspection logs - OK. Corrective action taken same day or next day.

Closeout Meeting

1) Letter to William E. Murphie, Manager and John Meersman.

2) During the inspection of X-326 L Cage, the inspectors observed several instances where containers were stored such that they could not be seen during the weekly inspections;

3) U.S. EPA suggested that the SAA area in X-623 be added to the SAA list;

4) U.S. EPA and OEPA will follow-up on speculative accumulation issue in X-744G with the T-Hoppers from Hanford, Washington. Metal box of used fluorescent lamps was mislabeled;

5) During te inspection of X-3346 Supply Room portion of X-3346, the inspectors observed a 55-gallon SAA container. The waste was not at or near the point of generation or under the control of the operator. Waste was identified as Liquox a 40% solution of Sodium Permanganate RFD #3957 with a D001 waste code, and had a date of 6/18/04. Bechtel Jacobs personnel stated that the material was used in Building X-701B.

6) During the inspection of Building X-7725, in G Area, the inspectors observed a dead mouse;

7) RFD's waste analysis - OK.

8) Training records - OK;

9) Contingency Plan - 12/22/03 version OK;

10) Weekly inspections - OK;

11) Manifests - February 2004 manifest quantities changed problem converting pounds to kilograms; waste codes penciled in; 6/24/03 manifest LDR box no checked that it met LDR standards not met for chromium even though box checked that it met LDR standards. Also,

10/3/03, Manifest #03I04 LDR box not checked id wastewater or non-wastewater (Note: Bechtel Jacobs personnel stated that this was sludge mixed with concrete as part of corrective action clean-up activities.

RCRA HAZARDOUS WASTE GENERATOR
INSPECTION CHECKLIST

pany: U.S. Department of Energy - Portsmouth Gaseous Diffusion Plant EPA ID#: OH7 890 008 983

...eet: 3930 US Route 23 South City: Piketon

County: Pike State: Ohio Zip: 45661

Mailing Address: PO Box 700, Piketon, Ohio 45661-0700

(If different from above)

Telephone: 740-897-5010 Fax #:

Owner/ Operator: Federal Government/Co-Operator Bechtel Jacobs Company LLC

(If different from above)

Street:

City: State: Ohio Zip:

Inspection Date(s): 8/9/2004 - 8/11/2004 Time(s): 8:00 am -

Inspection Announced? _____ Yes ___X__NO If so, how much advance notice given?

	Name	Affiliation	Telephone
Inspectors:	Melody Stewart	OEPA	740-380-5256
	Walt Francis	U.S. EPA	312-353-4921
Facility Representative:	Cliff Beeks	BJC	740-897-3579
	Mary Williams	BJC	740-897-5010
	Rosemary Richmond	BJC	740-897-2967
	Sandy Childers	BJC	740-897-2336

Complete All Other Applicable Checklists

Generator Classification	Waste Management Activity
_____ Conditionally Exempt SQG (CESQG)	___X__ Containers
_____ Small Quantity Generator (SQG)	_____ Tank(s)
___X__ Large Quantity Generator (LQG)	_____ Land Disposal Requirements (LDR)
_____ No Generation	_____ Used Oil
[redacted]	___X__ Universal Waste
[redacted]	_____ Other

...SQG:< 100 Kg. (approximately 25-30 gallons) of waste in a calendar month
Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month
>1,000 Kg. (~300 gallons) of waste in a calendar month or > 1 Kg. of acutely hazardous waste in a calendar month

...E: *To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds*

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

PROCESS DESCRIPTION

Historically, the main function of the DOE-PORTS facility was to enrich uranium for military use (nucle submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U23 from the U238 isotope in UF6 feedstock which contains 0.711% U235. However, in 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). USDOE retained ownership of the ongoing site environmental restoration program as well as two permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and are leased by USEC. These include decontamination of equipment and uranium recovery (X-705 Bldg.); chemical cleaning of equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); photo and printing lab (X-100); vehicle repair (X-750); coal pile runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in DOE owned and permitted storage facilities. Waste generated by DOE from the environmental restoration is also stored in these facilities. USEC ceased the enrichment process in May 2001.

WASTE MANAGEMENT, GENERATION AND AMOUNT

Uranium contaminated hazardous wastes (mixed waste) which were/are generated by USEC and DOE are stored on-site in DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of TSDs in the U.S. which could accept mixed waste, and a May 1991 DOE moratorium on off-site waste shipment. A large percentage of the waste generated at PORTS is DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in DOE-owned storage areas. During the past year, numerous shipments of hazardous waste were manifested off-site by both DOE and USEC. This is due to an increase in treatment capacity at off-site commercial treatment facilities and DOE treatment facilities, the lifting of the moratorium, and the execution of the site treatment plans for DOE and USEC. DOE sends some waste off-site (to U.S. DOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to DOE for storage in the interim prior to their final disposal.

Hazardous

The DOE Part B permit lists numerous hazardous waste codes for wastes that are generated by the above processes and the environmental restoration. These are stored in drums ranging in size from 30 to 110 gallon capacity, 5 gallon containers, 20 gallon lab packs, 5' cans, 4'x4'x6' boxes, 4'x4'x8' boxes, polybottles and laboratory bottles.

Nonhazardous

A wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes.

HAZARDOUS WASTE MANAGEMENT UNITS

The following DOE-owned permitted storage facilities were inspected during the CEI:

-X-7725	Container Storage Facility
-X-326	Container Storage Facility

In addition, DOE-owned and operated HWMUs and SAAs were inspected in the following buildings:

-X-326	-X-622
-X-7725	-X-624
-X-623	-X-3012
-X-333	-X-330
-X-622T	-X-747H
-X-3346	

Other Areas - X-744G Uranium Management Center

REGULATORY/ENFORCEMENT HISTORY

As a result of violations of state and federal hazardous waste regulations found during the 1987, 1988, and 1989 OEPA RCRA inspections, USDOE and OEPA entered into a Consent Decree governing restoration of the environment at DOE-PORTS. This decree includes a requirement that DOE close the X-701B, X-749, X-231B, and X-616 units within specific timeframes. The X-749, X-616 and X-231B units have now been closed. X-701B is yet to be closed.

On October 4, 1995, DFFOs were signed which allowed DOE to store LDR wastes in excess of one year, so long as waste is being stored in compliance with the orders and an approved site treatment plan. These orders supercede the May 18, 1993, DFFOs.

On February 24, 1998, DOE, LMES and Ohio signed DFFOs and a Consent Order regarding past violations and the management of DUF6 and LiOH.

On March 18, 1999, DOE and Ohio EPA signed DFFOs. These DFFOs provide exemptions to DOE and integrate the following unclosed units into the CMS/CMI process: X-749, X-231B, X-701C, X701B, X-230J7, and X-744Y.

A RCRA Permit was issued to DOE and its current co-operator, Bechtel Jacobs, for the X-7725 and X-326 storage facilities on March 15, 2001.

POLLUTION PREVENTION

Note to the Inspector: This checklist has been developed to help the division in gathering general informatio about the pollution prevention (P2) practices that the company may have initiated or attempted to initiate. The checklist is also used to:

- Facilitate P2 discussions;
- Identify barriers to P2;
- Define the P2 universe;
- Identify the need for future P2 initiatives;
- Identify partnership opportunities; and
- Link companies with better P2 resources.

As a prelude to completing this checklist the inspector should use the following list of questions as a way to initiate a dialogue concerning P2:

1. Have you tried to reduce the volume of waste (hazardous and nonhazardous) that you generate?

2. What is the largest waste stream that you generate?

3. How important would it be to you to eliminate that waste stream?

4. Does your company understand the reduced regulatory burden and cost saving benefits that eliminating or reducing a waste stream can have?

5. Could you use better housekeeping practices to reduce the amount of waste that you generate?

If the company responds with one of the answers below, the appropriate box should be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided or in the remarks section.

1. Has the company undertaken any P2 activities to reduce the amount of hazardous waste generated? Yes X No__ N/A ___ RMK#___

   a. ***If so,*** what has the company done to minimize hazardous waste generation?

   - ☐ A change in the process resulting in less waste.
   - ☐ A change in the product resulting in less waste.
   - ☐ Use of fewer and less toxic hazardous raw materials.
   - ☐ Better operations/improved housekeeping.
   - ☐ On-site recycling/reuse of hazardous materials.
   - ☒ Sending waste off-site for recycling/reuse.
   - ☐ Other activities (specify): _____

   b. ***If so,*** what hazardous wastes have been addressed?

   - ☐ Solvents
   - ☐ Paint related wastes

- ☐ Industrial process wastes (sludges, slags, contaminated waste waters, etc)
- ☐ Contaminated oils/hydraulic fluids
- ☐ Off-spec chemicals
- ☒ Fluorescent light bulbs
- ☒ Used batteries
- ☐ Shop rags
- ☐ Other (specify): _____

c. ***If not,*** why hasn't the company considered P2?

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

2. Does the company plan to do P2 activities in the future? Yes X No ___ N/A ___RMK#___

3. Would the company be interested in receiving additional information from Ohio EPA about P2? Yes X No___ N/A ___RMK#___

4. Did you give the company information about P2 during the inspection? Yes X No___ N/A ___RMK#___

5. Would the company like a P2 assessment? Yes___ No X N/A ___RMK#___

If the company would like a P2 assessment done at their facility, the inspector must give the company representative a copy of the <u>Pollution Prevention Assessments for Hazardous Waste Generators</u> document and discuss it with them.

6. If the company does not want a P2 assessment, why not? Company has program in place.

REMARKS

- Recycle Batteries
- Recv 250 Gal containers

LARGE QUANTITY GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] — Yes X No ☐ N/A ___ RMK#___

2. Has the generator obtained an identification number? [3745-52-12] — Yes X No ☐ N/A ___ RMK#___

3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41] — Yes X No ☐ N/A ___ RMK#___

WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? If so: — Yes___ No X N/A ___ RMK#___

   a. Has the generator notified U.S. EPA of export/import activity? [3745-52-53] — Yes ___ No ☐ N/A X RMK#___

   b. Has the generator complied with special manifest requirements? [3745-52-54] — Yes ___ No ☐ N/A X RMK#___

   c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] — Yes ___ No ☐ N/A X RMK#___

   d. Has an annual report been submitted to U.S. EPA? [3745-52-56] — Yes ___ No ☐ N/A X RMK#___

   e. Are export related documents being maintained on-site? [3745-52-57] — Yes ___ No ☐ N/A X RMK#___

GENERATOR CLOSURE REQUIREMENTS

5. Has the generator closed any <90-day accumulation unit(s) since the date of the last inspection? If so: — Yes___ No X N/A ___ RMK#___

   a. Describe the unit(s) which the generator has closed.

   b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] — Yes ___ No ☐ N/A X RMK#___

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

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

REMARKS

MANIFEST REQUIREMENTS

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

Are you aware of what the statement that you sign on the manifest says? Yes X No___

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

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

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

2. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] — Yes X No ☐ N/A ___RMK#___

NOTE: ***U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]***

3. Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)] — Yes X No ☐ N/A ___RMK#___

NOTE: ***The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].***

4. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: — Yes___ No X N/A ___RMK#___

   a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] — Yes ___ No ☐ N/A X RMK#___

5. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)] — Yes X No ☐ N/A ___RMK#___

6. Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not: — Yes X No___ N/A ___RMK#___

   a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)] — Yes X No ☐ N/A ___RMK#___

b. If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]

Yes ___ No ❑ N/A X RMK#___

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

Yes X No ❑ N/A ___RMK#___

REMARKS

PERSONNEL TRAINING

1. Does the generator keep records required by 3745-65-16(D) including:

   a. Job titles, as they relate to hazardous waste management, and the name of each employee filling each job? Yes X No ☐ N/A ___RMK#___

   b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position? Yes X No ☐ N/A ___RMK#___

   c. Type and amount of both introductory and continuing training to be given to each person filling a position? Yes X No ☐ N/A ___RMK#___

   d. Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)? Yes X No ☐ N/A ___RMK#___

NOTE: ***If the facility's business practices precludes written job titles/descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be used to document that all necessary employees have been trained.***

2. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to their positions? [3745-65-16(A)(2) Yes X No ☐ N/A ___RMK#___

3. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]

   a. Emergency procedures? Yes X No ☐ N/A ___RMK#___

   b. Emergency equipment? Yes X No ☐ N/A ___RMK#___

   c. Emergency systems? Yes X No ☐ N/A ___RMK#___

4. Does emergency training described in 3(a), (b) and (c) above include, *where applicable*: [3745-65-16(A)(3)(a-f)

   a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? Yes X No ☐ N/A ___RMK#___

   b. Key parameters for automatic waste feed cut-off systems? Yes X No ☐ N/A ___RMK#___

c. Communication or alarm system? Yes X No ☐ N/A ___ RMK#___

d. Response procedures for fire/explosions? Yes X No ☐ N/A ___ RMK#___

e. Response to groundwater contamination incidents? Yes X No ☐ N/A ___ RMK#___

f. Shutdown procedures? Yes X No ☐ N/A ___ RMK#___

5. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] TFI - Yes X No ☐ N/A ___ RMK#___

6. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes X No ☐ N/A ___ RMK#___

7. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes X No ☐ N/A ___ RMK#___

8. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)] Yes X No ☐ N/A ___ RMK#___

9. Are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes X No ☐ N/A ___ RMK#___

10. ***Optional***: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifests, etc.

Job Performed	Name of Employee	Date(s)Trained
Weekly Inspections	Jeremy Davis	
~~Ross Cassidy~~ " "	Ross Cassidy	

REMARKS

CONTINGENCY PLAN

1. Does the generator have a contingency plan which describes the following: [3745-65-52(A) through (F)]

   a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? — Yes X No ☐ N/A ___ RMK#___

   b. Arrangements/agreements with emergency authorities? [3745-65-37] — Yes X No ☐ N/A ___ RMK#___

   c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? — Yes X No ☐ N/A ___ RMK#___

   d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? — Yes X No ☐ N/A ___ RMK#___

   e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary? — Yes X No ☐ N/A ___ RMK#___

NOTE: ***If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]***

2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] — Yes X No ☐ N/A ___ RMK#___

3. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)(B)] — Yes X No ☐ N/A ___ RMK#___

4. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] — Yes X No ☐ N/A ___ RMK#___

12/22/03 version

EMERGENCY COORDINATOR

5. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] — Yes X No ☐ N/A ___ RMK#___

Lewis Goidell – 10/2/02

NOTE: ***The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan***

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes___ No X N/A ___RMK#___

   a. Was the contingency plan implemented? [3745-65-51(B)] Yes ___ No ☐ N/A X RMK#___

   b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes ___ No ☐ N/A X RMK#___

   c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes ___ No ☐ N/A X RMK#___

NOTE: ***OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.***

REMARKS

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

1. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] — Yes X No ☐ N/A ___ RMK#__

2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]

   a. Internal alarm system? — Yes X No ☐ N/A ___ RMK#___

   b. Emergency communication device? — Yes X No ☐ N/A ___ RMK#___

   c. Portable fire control, spill control and decon equipment? — Yes X No ☐ N/A ___ RMK#___

   d. Water of adequate volume/pressure? — Yes X No ☐ N/A ___ RMK#___

3. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] — Yes X No ☐ N/A ___ RMK#___

4. Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33] — Yes X No ☐ N/A ___ RMK#___

5. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32)*? [3745-65-34] — Yes X No ☐ N/A ___ RMK#___

6. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] — Yes X No ☐ N/A ___ RMK#___

7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] — Yes X No ☐ N/A ___ RMK#___

   a. Where authorities have declined to enter into arrangements/agreements, has the generator documented such a refusal? [3745-65-37(B)] — Yes ___ No ☐ N/A X RMK#___

REMARKS

GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)] — Yes ☐ No X N/A ___ RMK#___

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

2. Does the generator ensure that satellite accumulation area(s):

   a. Are at or near a point of generation? — Yes ___ No ☒ N/A ___ RMK# 1

   b. Are under the control of the operator of the process generating the waste? — Yes ___ No ☒ N/A ___ RMK# 1

   c. Do not exceed a total of 55 gallons of hazardous waste? — Yes X No___ N/A ___ RMK#___

   d Do not exceed one quart of acutely hazardous waste at any one time? — Yes X No ☐ N/A ___ RMK#___

   e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? — Yes X No ☐ N/A ___ RMK#___

NOTE: ***The 55 gallon limit applies to the area itself, and not to each individual waste stream accumulated in the area. The inspector should refer to Ohio EPA's November 1994 Guidance on the Location of Satellite Accumulation Areas.***

3. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so: — Yes___ No X N/A ___ RMK#___

   a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? — Yes ___ No ☐ N/A X RMK#___

   b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? — Yes ___ No ☐ N/A X RMK#___

USE AND MANAGEMENT OF CONTAINERS

4. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] — Yes X No ☐ N/A ___ RMK#___

5. Is the accumulation date on each container? [3745-52-34(A)(2)] — Yes X No ☐ N/A ___ RMK#___

RMK#1 – Building X – 3346 – SAA not at an area point of Generation.

6. Are hazardous wastes stored in containers which are:

a. Closed (except when adding/removing wastes)? [3745-66-73(A)] — Yes X No ☐ N/A ___ RMK#__

b. In good condition? [3745-66-71] — Yes X No ☐ N/A ___ RMK#___

c. Compatible with wastes stored in them? [3745-66-72] — Yes X No ☐ N/A ___ RMK#___

d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] — Yes X No ☐ N/A ___ RMK#___

7. Is the container accumulation area(s) inspected weekly? [3745-66-74] (*Note location in general information section of checklist)* — Yes X No ☐ N/A ___ RMK#___

a. Are inspections recorded in a log or summary? [3745-66-74] — Yes X No ☐ N/A ___ RMK#___

8. For ignitable and/or reactive hazardous waste(s):

a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] — Yes X No ☐ N/A ___ RMK#___

b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] — Yes X No ☐ N/A ___ RMK#___

PRE-TRANSPORT REQUIREMENTS

9. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] — Yes X No ☐ N/A ___ RMK#___

10. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] — Yes X No ☐ N/A ___ RMK#___

11. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] — Yes X No ☐ N/A ___ RMK#___

E:\USDOEPortsmouthChecklists\USDOEPortsLQG2004.wpd

REMARKS

LARGE QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

GENERAL REQUIREMENTS

Has the LQUWH obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)] — Yes ___ No ❑ N/A X RMK#___

PROHIBITIONS

2. Did the LQUWH dispose of universal waste? [3845-273-31(A)] — Yes ■ No ___ N/A ___ RMK#___

3. Did the LQUWH dilute or treat universal waste, except when responding to releases or by managing specific wastes as provided in OAC 3745-273-33? [3745-273-31(B)] — Yes ❑ No ___ N/A X RMK#___

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES:

4. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)] — Yes ___ No ❑ N/A X RMK#___

5. If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? — Yes ___ No ❑ N/A X RMK#___

6. Does the LQUWH conduct any of the following activities:

   a. Sort batteries by type? — Yes X No ___ N/A ___ RMK#___

   b. Mix battery types in one container? — Yes ___ No X N/A ___ RMK#___

   c. Discharge batteries to remove the electric charge? — Yes ___ No X N/A ___ RMK#___

   d. Regenerate used batteries? — Yes ___ No X N/A ___ RMK#___

   e. Disassemble them into individual batteries or cells? — Yes ___ No X N/A ___ RMK#___

   f. Remove batteries from consumer products? — Yes X No ___ N/A ___ RMK#___

   g. Remove the electrolyte from the battery? — Yes ___ No X N/A ___ RMK#___

   If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-33(A)(2)] — Yes ❑ No ___ N/A X RMK#___

7. If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)] — Yes ___ No ☐ N/A X RMK#___

   a. If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)] — Yes ___ No ☐ N/A X RMK#___

   b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)] — Yes ___ No ☐ N/A X RMK#___

8. Are the battery(ies) or container(s) of batteries located with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-34(A)] — Yes X No ☐ N/A ___ RMK# 2

UNIVERSAL WASTE PESTICIDES

9. Does the LQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-33(B)(1)] — Yes ___ No ☐ N/A X RMK#___

10. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-33(B)(2)] — Yes ___ No ☐ N/A X RMK#___

11. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 66-992, except for paragraph (C) of 3745-66-97; rule 3745-66-991 and 3745-66-992 of the OAC met? [3745-273-33(B)(3)] — Yes ___ No ☐ N/A X RMK#___

12. Is pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-33(B)(4)] — Yes ___ No ☐ N/A X RMK#___

13. Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)] — Yes ___ No ☐ N/A X RMK#___

14. Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)] — Yes ___ No ❑ N/A _X_ RMK#___

UNIVERSAL WASTE THERMOSTATS

15. Are thermostats that show evidence of leakage, spillage or damage that could cause leaks, properly contained? [3745-273-33(C)(1)] — Yes ___ No ❑ N/A _X_ RMK#___

16. If the thermostats are contained, are the containers closed, structurally sound, compatible with contents of the thermostats and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(C)(1)] — Yes ___ No ❑ N/A _X_ RMK#___

17. If the mercury-containing ampules are removed, does the LQUWH: [3745-273-33(C)(1)]

a. Remove the ampules in a manner to prevent breakage and is the removal done over a containment device? [3745-273-33(C)(2)(a)(b)] — Yes ___ No ❑ N/A _X_ RMK#___

b. Have a clean-up system readily available to transfer spilled material to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-33(C)(2)(c)(d)] — Yes ___ No ❑ N/A _X_ RMK#___

c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-33(C)(2)(e)] — Yes ___ No ❑ N/A _X_ RMK#___

d. Ensure employees are thoroughly familiar with proper waste handling and emergency procedures? [3745-273-33(C)(2)(f)] — Yes ___ No ❑ N/A _X_ RMK#___

e. Ensure removed ampules are stored in closed, non-leaking containers that are in good condition? [3734-273-33(C)(2)(g)] — Yes ___ No ❑ N/A _X_ RMK#___

f. Pack removed ampules in containers with packing material to prevent breaking during storage, handling and transportation? [3745-273-33(C)(2)(h)] — Yes ___ No ❑ N/A _X_ RMK#___

18. If mercury or clean-up residues resulting from spills or leaks or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-33(C)(3)(a)] — Yes ___ No ☐ N/A X RMK#___

a. If the waste is characteristic, was it managed in compliance with 3745-50 through 3745-69? (*The handler is considered the generator of the mercury, residues, and/or other waste and is subject to Chapter 3745-52)* [3745-273-33(C)(3)(b)] — Yes ___ No ☐ N/A X RMK#___

b. If the mercury, residues and/or other waste are not hazardous, are they managed in compliance with applicable law? [3745-273-33(C)(3)(c)] — Yes ___ No ☐ N/A X RMK#___

19. Are the thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)" [3745-273-34] — Yes ___ No ☐ N/A X RMK#___

ACCUMULATION TIME

20. Is the waste accumulated for less than one year? [3745-273-35(A)] — Yes X No ___ N/A ___ RMK#___

a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on handler to demonstrate) [3745-273-35(B)] — Yes ___ No ☐ N/A X RMK#___

NOTE: ***Accumulation is defined as date generated or date received from another handler.***

21. Has the length of time the universal waste has been accumulated documented by ***one*** of the following: [3745-273-35(C)] — Yes X No ☐ N/A ___ RMK#___

a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-35(C)(1)] — Yes X No _ N/A ___ RMK#3

b. Marking or labeling the individual item of universal waste with the date that it became a waste or was received? [3745-273-35(C)(2)] — Yes ___ No X N/A ___ RMK#___

c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-35(C)(3)] — Yes ___ No X N/A ___ RMK#___

d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-35(C)(4)] — Yes ___ No X N/A ___ RMK#___

e. Placing the universal waste in a specific accumulation area and identifying the earliest that any universal waste in the area became a waste or was received? [3745-273-35(C)(5] — Yes ___ No X N/A ___ RMK#___

f. Any other method which clearly demonstrates the length of time the universal waste has been accumulated from the date it became a waste or is received? [3745-273-35(C)(6)] — Yes ___ No X N/A ___ RMK#___

EMPLOYEE TRAINING

22. Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36] — Yes X No ❑ N/A ___ RMK#___

RESPONSE TO RELEASES

23. Were releases of universal waste and other residues immediately contained? [3745-273-37(A)] — Yes ___ No ❑ N/A X RMK#___

24. Was the released material characterized? [3745-273-37(B)] — Yes ___ No ❑ N/A X RMK#___

25. If the released material was a hazardous waste, was it managed as required in OAC 3745-50 through 3745-69? *(If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52)* [3745-273-37(C)] — Yes ___ No ❑ N/A X RMK#___

OFF-SITE SHIPMENTS

NOTE: ***If a LQUWH self-transports wastes, then the handler must comply with the Universal Waste transporter requirements.***

26. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)] — Yes X No ❑ N/A ___ RMK#___

NOTE: ***LQUWHs are prohibited to send waste to any other facility.***

27. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-38(C)] — Yes X No ❑ N/A ___ RMK#___

28. Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)] — Yes X No ❑ N/A ___ RMK#___

29. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following: — Yes ___ No ❑ N/A X RMK#___

    a. Receive the waste back? [3745-273-38(E)(1)] — Yes___ No___ N/A X RMK#___

    b. Agree to where shipment will be sent? [3745-273-38(E)(2)] — Yes___ No___ N/A X RMK#___

30. If a handler rejects a partial or full load from another handler, does the receiver handler contact the originating handler and discuss one of the following: — Yes ___ No ❑ N/A X RMK#___

    a. Sending the waste back to originating handler? [3745-273-38(F)(1)] — Yes___ No___ N/A X RMK#___

    b. Sending the shipment to a destination facility? [3745-273-38(F)(2)] — Yes___ No___ N/A X RMK#___

31. If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)] — Yes ___ No ❑ N/A X RMK#___

32. If the handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-38(H)] — Yes ___ No ❑ N/A X RMK#___

TRACKING UNIVERSAL WASTE SHIPMENTS

33. Are universal waste received from another handler? If so: Yes___ No X N/A ___RMK#___

a. Is a record of each shipment kept? [3745-273-39(A)] Yes ___ No ❑ N/A X RMK#___

NOTE: ***This record can be in the form of a log, invoice, manifest, bill of lading, or other shipping document. This also applies to question No. 35(a).***

34. Does the record include the following:

a. Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)] Yes ___ No ❑ N/A X RMK#___

b. Quantity of each type of universal waste? [3745-273-39(A)(2)] Yes ___ No ❑ N/A X RMK#___

c. Date received? [3745-273-39(A)(3)] Yes ___ No ❑ N/A X RMK#___

35. Is universal waste shipped to another handler? If so: Yes___ No___ N/A X RMK#___

a. Is a record of each shipment kept? [3745-273-39(B)] Yes ___ No ❑ N/A X RMK#___

36. Does the record include the following?

a. Name and address of universal waste handler, destination facility, or foreign destination? [3745-273-39(B)(1)] Yes ___ No ❑ N/A X RMK#___

b. Quantity of each type of universal waste? [3745-273-39(B)(2)] Yes ___ No ❑ N/A X RMK#___

c. Date shipped? [3745-273-39(B)(3)] Yes ___ No ❑ N/A X RMK#___

37. Are records kept for three years? [3745-273-39(C)(1)(2)] Yes X No ❑ N/A ___ RMK#___

EXPORTS

38. Is waste being sent to a foreign destination? If so: Yes ___ No X N/A ___ RMK#___

a. Does the large quantity handler comply with primary exporter requirements in OAC rules 3745-52-53 and 3745-52-57, and paragraphs (A)(1) - (A)(6) and (B) of 3745-52-56? [3745-273-40(A)] Yes ___ No ❑ N/A X RMK#___

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA "Acknowledgment of Consent" 37845-52-50 to -52-57? [3745-273-40(B)] Yes ___ No ❑ N/A X RMK#___

c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)] Yes ___ No ❑ N/A _X_ RMK#___

REMARKS

#2 The batteries were not individually labeled as required.
#3. The stack of baterries was labeled with the accumulation date; however the batteries were not in a container.

LDR REQUIREMENTS

Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] **If so**: Yes X No ❑ N/A ___RMK#___

a. **For determinations based solely on knowledge of the waste:** Is supporting data retained on-site? [3745-270-07(A)(6)] Yes X No ❑ N/A ___RMK#___

b. **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes X No ❑ N/A ___RMK#___

2. Has the generator determined each Ohio EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2), see Table 1] Yes X No ❑ N/A ___RMK#___

3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes X No ❑ N/A ___RMK#___

4. Does the generator generate a characteristic hazardous waste? **If so:** Yes X No___ N/A ___RMK#___

a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes X No ❑ N/A ___RMK#___

NOTE: *If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.*

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] **If so:** Yes X No___ N/A ___RMK#___

a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes X No ❑ N/A ___RMK#___

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]*

6. Has the generator **correctly** determined if restricted wastes meet or exceed treatment standards? [3745-270-07(A)(1)] Yes X No ❑ N/A ___RMK#___

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

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

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

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] — Yes ❑ No___ N/A X RMK#___

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] **If so:** — Yes___ No X N/A ___RMK#___

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

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

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

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

    a. Has the facility complied with 3745-270-04? — Yes ___ No ❑ N/A X RMK#___

REMARKS

TIFICATION AND CERTIFICATION REQUIREMENTS

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

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

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

REMARKS

STATE PART B HAZARDOUS WASTE PERMIT INSPECTION CHECKLIST

DIVISION OF HAZARDOUS WASTE MANAGEMENT
OHIO EPA
August 2004

Table of Contents
U.S. DOE - Portsmouth Gaseous Diffusion Plant
04-66-0680

RCRA Inspection Checklist 1

General Conditions of Permit 2
- General Permit Compliance and Activities 2

Permit Modification, Revision, Revocation 5

Site Entry - Availability of Records 7

Recordkeeping Requirements 7
- Confidentiality 7
- Operating Record 7
- Annual Report Requirement 9
- Sampling/monitoring Recordkeeping Requirements 9
- Waste Minimization Requirements 10

Off-site Shipments/manifest Requirements 11
- Manifest Requirements/wastes Received On-site 11

Waste Analysis/waste Analysis Plan 11
- General Requirements 12
- Waste Analysis Quality Assurance Requirements 12

General Inspection Requirements 14

Security Provisions/facility Operation 15

Personnel Training 16

Required Equipment 16

Contingency Plan Requirements 17
- Emergency Procedures 17
- Emergency Authorities 18
- Emergency Coordinator 18
- Amendment of Plan 18
- Implementation of Plan 19

Contingency Plan Requirements 20
- Closure Plan/amendment 20
- Closure Activities 20

Requirements for Ignitable, Reactive or Incompatible Wastes 22

Storage of Hazardous Wastes in Containers 24
- Condition of Containers 25
- Inspections 25
- Containment System 26
- Required Aisle Space 27
- Closure and Post-closure 27
- Container Storage of Residual Waste 27

Land Disposal Restriction Requirements 28
- Prohibition Against Dilution 28
- Generator Requirements 28
- Notification/certification 29
- Storage of Land Disposal Restricted Wastes . . . . .

OHIO PART B PERMITTED FACILITY
RCRA INSPECTION CHECKLIST

cility: U.S. DOE - Portsmouth Gaseous Diffusion Plant Ohio Permit #: 04-66-0680

Co-operator: Bechtel Jacobs Company LLC

Address: 3930 U.S. Route 23 South
Piketon, OH 45661

USEPA ID#: OH7 890 008 983
Facility Phone: 740-897-5010

County: Pike

Time: 8:00 -

Inspection Date: 8/9/04 - 8/11/04

Advance notice of inspection given?___(Yes) __X_(No)
If so, how far in advance? _____

	Name	***Agency/Title***	***Phone***
Inspector(s):	Walt Francis	U.S. EPA	312-353-4921
	Melody Stewart	Ohio EPA	740-380-5256
Facility	Russell Vranicar	USDOE	740-897-??
	Cliff Beeks	Bechtel Jacobs	740-897-3579
Representative(s):	Mary Williams	Bechtel Jacobs	740-897-5010
	Sandy Childers	Bechtel Jacobs	740-897-2336

Is facility operating as a generator? Yes __X_____ No _____

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

PERMIT STATUS

Permit Issued: March 15, 2001
Permit Effective Date: March 15, 2001
Permit Expiration Date: March 15, 2006

	STORAGE		**TREATMENT**		**DISPOSAL**
X	Container		Tank		Injection Well
	Tank		Surface Impoundment		Landfill
	Waste Pile		Incinerator		Land Application
	Surface Impoundment		Thermal Treatment		Surface Impoundment

GENERAL CONDITIONS OF PERMIT

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1. Has the expiration date of the permit passed? If so: Yes__No_X_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 _X_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? (Or upon a later date if the permittee can demonstrate good cause for late submittal.) [Condition A.6.(a)] Yes__No__ N/A _X_RMK#__

NOTE: *The permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:*

   A. The permittee has submitted a timely and complete application for a renewal permit under OAC rule 3745-50-40; and

   B. Through no fault of the permittee, a new permit has not been issued pursuant to OAC rule 3745-50-40 on or before the expiration date of the permit. [Condition A.6.(b)]

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.26] Yes_X_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? [Condition A.1.(b) and A.5] Yes__No_X_ N/A ___RMK#__

4. Have any provisions of the permit been identified as invalid? [Condition A.4.] Yes__No_X_ N/A ___RMK#__

5. Has the facility identified any instances of noncompliance with the permit, RC Chapter 3734. or the rules adopted thereunder, which may endanger human health or the environment? If so: Yes__No_X_ N/A ___RMK#__

   a. Did the facility immediately report orally the following to Ohio EPA's Emergency Response Section within 24 hours of becoming aware of the circumstance(s): [Condition A.20.(a)]

i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and — Yes__No__ N/A _X_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 or operator? — Yes__No__ N/A _X_RMK#__

B. Name, address and telephone number of the facility? — Yes__No__ N/A _X_RMK#__

C. Name and quantity of material(s) involved? — Yes__No__ N/A _X_RMK#__

D. The extent of injuries, if any? — Yes__No__ N/A _X_RMK#__

E. An assessment of the actual or potential hazard to the environment and human health outside the facility where this is applicable? — Yes__No__ N/A _X_RMK#__

F. Estimated quantity and disposition of recovered material that resulted from the incident? — Yes__No__ N/A _X_RMK#__

6. Did the permittee provide a written report to Ohio EPA's Emergency Response Section and DHWM, SEDO within five days of the time the permittee became aware of the circumstances reported in Question 5? [Condition A.21.] If so did the report contain: — Yes__No__ N/A _X_RMK#__

a. A description of the noncompliance and its cause (including exact dates and times)? — Yes__No__ N/A _X_RMK#__

b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? — Yes__No__ N/A _X_RMK#__

c. Steps taken or planned to minimize the impact on human health and the environment and to reduce and prevent recurrence of the noncompliance? — Yes__No__ N/A _X_RMK#__

Note: *The permittee need not comply with the five day written report requirement if the director, upon goo cause shown by the permittee, waives that requirement and the permittee submits a written report within 15 days of the time the permittee becomes aware of the circumstances. [Condition A.21.(c)]*

7. Has the permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8] — Yes__No__ N/A _X_RMK#__

8. Has the permittee identified any other instances of noncompliance not provided for in Question 5? — Yes__No__ N/A _X_RMK#__

   a. If so, did the permittee report to the director within a month of the time at which the permittee is aware of such noncompliance? [Condition A.22.] — Yes__No__ N/A _X_RMK#__

   b. Do the reports provided contain the information set forth in Condition A.20? — Yes__No__ N/A _X_RMK#__

9. Has the permittee planned any physical alterations or additions to the permitted facility? — Yes__No_X_ N/A ___RMK#__

   a. If so, has the facility provided Ohio EPA with notice of such changes? [Condition A.15] — Yes__No__ N/A _X_RMK#__

Note: *Such notification does not waive the permittee's duty to comply with the permit pursuant to Condition A.5.*

REMARKS

'RMIT MODIFICATION, REVISION, REVOCATION

1. Has the permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.] — Yes X No___ N/A ___RMK#___

2. Has the permit been transferred to a new owner or operator? [Condition A.18.] If so, — Yes___No X N/A ___RMK#___

   a. Has the transfer been conducted in accordance with R.C. Chapter 3734. and the rules adopted thereunder? [Condition A.18.]; and — Yes___No___ N/A _X_RMK#___

   b. Before transferring ownership did the permittee notify the new owner in writing of the requirements of R.C. Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.18.] — Yes___No___ N/A _X_RMK#___

3. Has the permittee submitted reports of compliance or noncompliance with, or any progress reports on the requirements contained 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 _X_RMK#___

4. Has the permittee furnished relevant information which Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, or to determine compliance with the permit? [Condition A.10] — Yes X No___ N/A ___RMK#___

5. Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10] — Yes X No___ N/A ___RMK#___

6. 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 HWFB? If so, — Yes___No X N/A ___RMK#___

   a. Has the permittee promptly submitted such facts or corrected information to the appropriate entity? [Condition A.24.] — Yes___No___ N/A _X_RMK#___

7.	Is the permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications to the application? [Condition A.14.(c)]	Yes X No___ N/A ___RMK#___
8.	Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14.(c)]	Yes X No___ N/A ___RMK#___

REMARKS

E ENTRY - AVAILABILITY OF RECORDS

As specified in Condition A.11., has the permittee allowed the director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection, 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 X No___ N/A ___RMK#___

b. Have access to and copy any records required to be kept under the conditions of the permit? Yes X No___ N/A ___RMK#___

c. Inspect at reasonable times facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit? Yes X No___ N/A ___RMK#___

d. Sample, document, or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by R.C. Chapter 3734. and the rules adopted thereunder? Yes X No___ N/A ___RMK#___

RECORDKEEPING REQUIREMENTS

CONFIDENTIALITY

1. Has the permittee requested confidentiality of any information of the permit in accordance with R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.25.] Yes___No X N/A ___RMK#___

OPERATING RECORD

2. Is the permittee maintaining a written operating record at the facility as set forth in OAC rule 3745-54-73 and Condition B.22. of the permit which contains the following elements:

a. A description and the quantity of each hazardous waste received? Yes X No___ N/A ___RMK#___

b. Method(s) and date(s) of treatment, storage or disposal at the facility? Yes X No___ N/A ___RMK#___

c. The location of each hazardous waste within the facility and the quantity at each location? Yes X No__ N/A ___RMK#__

3. Is the permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents as part of its operating record: [Condition A.28.]

a. Waste analysis plan in accordance with OAC rule 3745-54-13 and the conditions of the permit? Yes X No__ N/A ___RMK#__

b. Contingency plan in accordance with OAC rule 3745-54-53 and the conditions of the permit? Yes X No__ N/A ___RMK#__

c. Closure plan in accordance with OAC rule 3745-55-12 and the conditions of the permit? Yes X No__ N/A ___RMK#__

d. Personnel training plan and records required by OAC rule 3745-54-16 and the conditions of the permit? Yes X No__ N/A ___RMK#__

e. Inspection schedules developed in accordance with OAC rules 3745-54-15 and 3745-55-74 and the conditions of the permit? Yes X No__ N/A ___RMK#__

4. Have any of the documents identified in Question #3 been revised as required by the permit? If so, Yes X No__ N/A ___RMK#__

a. Has the permittee submitted the revisions to Ohio EPA? [Condition A.28.(b)] Yes X No__ N/A ___RMK#__

b. Has the permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.28.(b)] Yes X No__ N/A ___RMK#__

5. Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from the date of inspection? [Condition A.28.(c)] Yes X No__ N/A ___RMK#__

'NUAL REPORT REQUIREMENT

6. 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 and the conditions of the permit? [Condition B.25.] Yes X No___ N/A ___RMK#___

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

7. In compliance with Condition A.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 X No___ N/A ___RMK#___

   b. Individual(s) who performed the sampling or measurement? Yes X No___ N/A ___RMK#___

   c. Date(s) analyses were performed? Yes X No___ N/A ___RMK#___

   d. Individual(s) who performed the analyses? Yes X No___ N/A ___RMK#___

   e. Analytical technique(s) or method(s) used? Yes X No___ N/A ___RMK#___

   f. Results of such analyses? Yes X No___ N/A ___RMK#___

8. 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 A.12.(a)] Yes X No___ N/A ___RMK#___

9. Has Ohio EPA requested submittal of any reports or other information required by the conditions of the permit from the permittee? If so, Yes___No X N/A ___RMK#___

   a. Have the submittals been signed and certified according to OAC rules 3745-50-58(K) and 3745-50-42? [Condition A.13.] Yes___No___ N/A X RMK#___

WASTE MINIMIZATION REQUIREMENTS

10. Has the permittee submitted a Waste Minimization Report to Ohio EPA meeting the requirements of Condition A.29. of the permit within 180 days of permit journalization? Yes X No__ N/A ___RMK#___

    a. Following the first submittal as identified above in Question #10, has the permittee submitted biennial updates to this report as required by Condition A.29.(c)? Yes X No__ N/A ___RMK#___

REMARKS

F-SITE SHIPMENTS/MANIFEST REQUIREMENTS

1. Is all hazardous and mixed waste transported from the facility by a properly registered transporter of hazardous and mixed waste in accordance with all applicable laws, rules and standards? [Condition A.16.] — Yes X No ___ N/A ___ RMK#___

MANIFEST REQUIREMENTS/WASTES RECEIVED ON-SITE

2. Upon receipt of the manifests, has the permittee signed and dated each copy of the manifest? [OAC 3745-54-71(A)(1); Condition B.24.] — Yes X No ___ N/A ___ RMK#___

3. For any significant discrepancies identified upon receipt of the manifest(s): did the permittee note such discrepancies on the manifest(s) in accordance with OAC rule 3745-54-71(A)(2) and Condition B.24? — Yes ___ No ___ N/A X RMK#___

   a. Did the permittee attempt to reconcile the discrepancy? [Condition B.24.] — Yes ___ No ___ N/A X RMK#___

   b. If the discrepancy was not resolved within 15 days: did the permittee submit a report, including a copy of the manifest, to the director in accordance with OAC rule 3745-54-72(B)? [Condition B.24.] — Yes ___ No ___ N/A X RMK#___

4. Does the permittee immediately give the transporter at least one copy of the signed manifest? [OAC 3745-54-71(A)(3); Condition B.24.] — Yes X No ___ N/A ___ RMK#___

5. Does the permittee provide the generator with a copy of the manifest within 30 days of receipt of waste on-site? [OAC 3745-54-71(A)(4); Condition B.24.] — Yes X No ___ N/A ___ RMK#___

6. Does the permittee retain a copy of each manifest on-site for at least three years from the date of delivery? [OAC 3745-54-71(A)(5); Condition B.24.] — Yes X No ___ N/A ___ RMK#___

7. Has the permittee received any hazardous waste or mixed waste from off-site, other than as described in Condition B.2(b)? — Yes ___ No X N/A ___ RMK#___

WASTE ANALYSIS/WASTE ANALYSIS PLAN

GENERAL REQUIREMENTS

1. Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information which is necessary to properly treat, store or dispose of the waste in accordance with OAC Chapters 3745-54 to 3745-57 and Condition B.3 of the permit (Section C of the approved permit application)? [OAC 3745-54-13(A)(1)] — Yes X No ___ N/A ___ RMK#___

2. Since the last inspection, were any wastes generated by the facility which were unable to be characterized through process knowledge? If so, — Yes ___ No X N/A ___ RMK#___

   a. Were the waste analysis procedures described in Section C of the approved permit application followed? — Yes ___ No ___ N/A X RMK#___

3. Is the permittee following the procedures described in the approved waste analysis plan (Section C of approved permit application) and the requirements of OAC rule 3745-54-13? [Condition B.3.] — Yes X No ___ N/A ___ RMK#___

4. Is the permittee maintaining waste analysis data in the facility's operating record as required by OAC rule 3745-54-73 and Condition B.22. of the permit? — Yes X No ___ N/A ___ RMK#___

WASTE ANALYSIS QUALITY ASSURANCE REQUIREMENTS

5. Is the permittee verifying the analysis of each waste stream annually as part of its quality assurance program in accordance with SW-846? [Condition B.3.] — Yes X No ___ N/A ___ RMK#_

6. In accordance with Condition B.3. of the permit, does the permittee's quality assurance plan ensure that the permittee is, at a minimum:

   a. Maintaining property functional instruments? — Yes X No ___ N/A ___ RMK#___

   b. Using approved sampling/analytical methods? — Yes X No ___ N/A ___ RMK#___

   c. Verifying the validity of sampling and analytical procedures and performance of correct calculations? — Yes X No ___ N/A ___ RMK#___

If the permittee uses a contract laboratory to perform analyses, did the permittee inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this permit?

Yes X No__ N/A ___RMK#___

REMARKS

GENERAL INSPECTION REQUIREMENTS

1. Is the permittee following the inspection procedures and schedules described in Section F of the approved permit application and the requirements of OAC rule 3745-54-15? [Condition B.5.] — Yes__ No_X_ N/A ___RMK#_1_

2. Does the permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [OAC 3745-54-15(A)(1)(2)] — Yes_X_No___ N/A ___RMK#___

3. 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? — Yes_X_No___ N/A ___RMK#___

   a. Is the schedule kept at the facility? [OAC 3745-54-15(B)(2)] — Yes_X_No___ N/A ___RMK#___

   b. Does the schedule identify the types of problems which are to be looked for during the inspection? [OAC 3745-54-15(B)(3)] — Yes_X_No___ N/A ___RMK#___

   c. Does the schedule include inspection of areas subject to spills daily when in use and according to other applicable regulations when not in use? [OAC 3745-54-15(B)(4)] — Yes_X_No___ N/A ___RMK#___

4. 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_X_No___ N/A ___RMK#___

5. Is the permittee maintaining records of inspections for a minimum of three years? [Condition B.5.] — Yes_X_No___ N/A ___RMK#___

6. 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_X_No___ N/A ___RMK#___

   b. Signature of inspector? — Yes_X_No___ N/A ___RMK#___

   c. Notation of observations made? — Yes_X_No___ N/A ___RMK#___

d. Date/nature of any repairs or other remedial actions? Yes X No__ N/A ___RMK#__

SECURITY PROVISIONS/FACILITY OPERATION

1. Is the permittee complying with the security provisions of OAC rule 3745-54-14(B)(1) and B(2) and (C) and Section F of the approved permit application, including the following: [Condition B.4.]

   a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility; Yes X No__ N/A ___RMK#__

   b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility; or Yes X 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 X No__ N/A ___RMK#__

2. In accordance with OAC rule 3445-54-14(C), does the permittee have signs reading "Danger-Unauthorized Personnel Keep Out" posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? [Condition B.4.] Yes X No__ N/A ___RMK#__

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 waters? [Condition B.1.] Yes X No__ N/A ___RMK#__

REMARKS

RMK #1 - Building X-326 L Cage, inspector unable to view certain containers during weekly inspections.

PERSONNEL TRAINING

1. Is the facility conducting personnel training in accordance with Section H of the approved permit application and the following requirements of OAC rule 3745-54-16: [Condition B.6.]

   a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC 3745-54-16(A)(B)(C)] — Yes X 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 3745-54-16(B)? — Yes X No___ N/A ___RMK#___

   c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(B)? — Yes___ No X N/A ___RMK# 1

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 X No___ N/A ___RMK#___

REQUIRED EQUIPMENT

1. Is the permittee, at a minimum, maintaining the equipment set forth in the approved permit application (Section G) at the facility? [Condition B.9.] — Yes X No___ N/A ___RMK#___

2. Is the permittee inspecting, testing, and maintaining the equipment specified in Question #1 to assure its proper operation as specified in OAC rule 3745-54-33, the inspection plans and Section G of the approved permit application? [Condition B.10.] — Yes X 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 Section G of the approved permit application? [Condition B.11.] — Yes X No___ N/A ___RMK#___

'NTINGENCY PLAN REQUIREMENTS

⌐MERGENCY PROCEDURES

1. In compliance with Condition B.13.(a) of the permit, does the permittee:

   a. Familiarize the emergency response agencies likely to respond to an emergency at the facility with:

      i. The location and layout of the facility? Yes X No___ N/A ___RMK#___

      ii. Properties of hazardous waste and mixed waste managed at the facility and associated hazards? Yes X No___ N/A ___RMK#___

      iii. Places where facility personnel will normally be working? Yes X No___ N/A ___RMK#___

      iv. Entrances to and roads inside the facility? Yes X No___ N/A ___RMK#___

      v. Evacuation routes as depicted in Section G of the permit application? Yes X No___ N/A ___RMK#___

   b. Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the facility, and any further requirements imposed by the permit?; and Yes X No___ N/A ___RMK#___

   c. Familiarize local police and fire departments, local hospitals and other local emergency services with the properties of hazardous waste and mixed waste managed at the facility and the types of injuries which could result from fires, explosions or a release of hazardous wastes at the facility? Yes X No___ N/A ___RMK#___

2. Is the permittee in compliance with the requirements of OAC rule 3745-54-56 and Section G of the approved permit application regarding emergency procedures? [Condition B.20.] Yes X No___ N/A ___RMK#___

EMERGENCY AUTHORITIES

3. 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_X_ 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 _X_RMK#___

4. 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.] — Yes_X_No__ N/A ___RMK#___

5. Has the permittee notified the agencies in Question #4, in writing, within ten days of the effective date of any amendments or revisions to the Plan? [Condition B.18.(b)] — Yes_X_No__ N/A ___RMK#___

6. 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 in accordance with OAC rule 3745-54-53? [Condition B.18.(c)] — Yes_X_No__ N/A ___RMK#___

EMERGENCY COORDINATOR

7. Is the permittee in compliance with the requirements of OAC rule 3745-54-55 with regard to the emergency coordinator? [Condition B.19.] — Yes_X_No__ N/A ___RMK#___

AMENDMENT OF PLAN

8. Is the permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17.] — Yes_X_No__ N/A ___RMK#___

Note: *Also see Question #4 of RECORDKEEPING REQUIREMENTS to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.*

PLEMENTATION OF PLAN

	Has there been a fire, explosion or release of hazardous waste or mixed waste or constituents at the facility since the last date of inspection as described by Condition B.14. of the permit? If so,	Yes__No_X_ 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? [Condition B.14.]	Yes__No___ N/A _X_RMK#___
b.	Did the permittee collect and manage released material, emergency response material and by-products as hazardous waste or mixed waste until making a demonstration to Ohio EPA that such materials are not subject to Ohio hazardous waste rules? [Condition B.16.]	Yes__No___ N/A _X_RMK#___
c.	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 _X_RMK#___
i.	Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23.] ***Note:*** *See also Conditions A.21. and A.22. of the permit for additional reporting/recordkeeping requirements.*	Yes__No___ N/A _X_RMK#___
d.	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? [Condition B.23.]	Yes__No___ N/A _X_RMK#___

REMARKS

CONTINGENCY PLAN REQUIREMENTS

CLOSURE PLAN/AMENDMENT

1. Is the permittee maintaining at the facility, the approved closure plan which contains the elements set forth in OAC rule 3745-55-12? [Condition B.29.] Yes X No__ N/A ___RMK#__

2. Has the permittee amended the closure plan? If so, Yes__No X N/A ___RMK#__

   a. Has the plan been amended in accordance with OAC rule 3745-55-12(C)? [Condition B.28.] Yes__No__ N/A _X_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.*

CLOSURE ACTIVITIES

3. Has the permittee closed the facility? If so, Yes__No X N/A ___RMK#__

   a. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26.] Yes__No__ N/A _X_RMK#__

   b. Did the permittee carry-out the approved closure plan as set forth in the permit application and terms and conditions of the permit? [Condition B.26.] Yes__No__ N/A _X_RMK#__

   c. After receiving the final volume of hazardous waste, did the permittee remove from the facility all hazardous waste and mixed 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 _X_RMK#__

   d. 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 _X_RMK#__

   e. Did the permittee notify Ohio EPA's Southeast District Office within five working days prior to all rinseate and soil sampling? [Condition B.32.(b)] Yes__No__ N/A _X_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 _X_RMK#__

REMARKS

REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

1. Is the permittee following the procedures as specified in OAC rules 3745-54-17, 3745-55-77 and Section F of the approved application when managing ignitable, reactive and/or incompatible wastes? [Conditions B.7.(a) and C.10. and C.11.] Yes X No___ N/A ___RMK#___

2. Does the permittee ***not*** store incompatible waste ***except*** in accordance with OAC rules 3745-54-17(B) and 3745-55-77, and the terms and conditions of this permit? [Condition C.11.(a)] Yes X No___ N/A ___RMK#___

3. Does the permittee take precautions to prevent placing hazardous waste or mixed waste in an unwashed container that previously held an incompatible waste or material? [Condition C.11.(b)] Yes X No___ N/A ___RMK#___

4. Does the permittee ensure that all containers of incompatible wastes are physically separated from other incompatible wastes or materials by a wall, berm, dike, or other device in accordance with OAC rule 3745-55-77 and the Appendix to OAC rule 3745-55-99? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

   a. Are all containers of aqueous hazardous acids (ph $\leq$ 2) and caustics ph $\geq$ 12.5) sorted on different pallets and physically separated in different rooms? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

   b. Are aqueous acids and caustics in poly bottles, and other containers requiring nuclear criticality safety spacing physically separated in the same room by a dike? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

   c. Are containers of cyanides and sodium metals being stored in rooms physically separate from other incompatible wastes or other incompatible materials? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

5. Does the permittee provide electrical grounding for all containers, tanks and transport vehicles during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(b)] Yes X No___ N/A ___RMK#___

	Does the permittee provide and require the use of spark proof tools during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(c)]	Yes X No___ N/A ___RMK#___
7.	Does the permittee prohibit smoking and open flames in areas where hazardous wastes are managed and post appropriate signs? [Condition B.7.(d)]	Yes X No___ N/A ___RMK#___
8.	As required by OAC rule 3745-55-76, does the permittee store containers of ignitable or reactive wastes greater than 15 meters (50 feet) away from the Portsmouth Gaseous Diffusion Plant reservation boundary? [Condition C.10.(a)]	Yes X No___ N/A ___RMK#___

REMARKS

STORAGE OF HAZARDOUS WASTES IN CONTAINERS

NOTE: *The requirements of permit 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.*

1.	Is the permittee storing in containers, only those wastes as specified in Section A of the Part B permit application? [Condition C.1.(a), C.2.]	Yes_X_No___ N/A ___RMK#___
2.	Does the permittee limit the total quantity of containerized waste in the container storage area to 133,000 gallons at any given time in the permitted container areas, located in building X-326 and no more than 5,456,000 gallons at any given time in the permitted storage areas located in building X-7725? [Condition C.1.(a)]	Yes_X_No___ N/A ___RMK#___

NOTE: *For the purposes of compliance with the capacity limitation of the permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity. For example, a 55-gallon drum will be considered to be holding 55 gallons of waste, regardless of the actual quantity stored in the drum. [Condition C.1.(b)]*

3.	When accumulating waste within the permitted X-7725 and X-326 container storage area, does the permittee ensure that the total amount of waste (both > 90 days and < 90 days) does not exceed the maximum container storage inventory established under Condition C.1.? [Condition C.1.(c)]	Yes_X_No___ N/A ___RMK#___
4.	Are hazardous wastes subject to regulation by the permit stored only at the designated container storage area described in the approved permit application? (See Section D of the permit application) [Condition C.1.(a)]	Yes_X_No___ N/A ___RMK#___
5.	Is each container stored clearly marked to identify its contents and the date each period of accumulation/storage begins? (See Section D of the permit application) [Condition C.3.]	Yes_X_No___ N/A ___RMK#___
6.	Does the permittee store hazardous waste in the types of containers described in Section D of the approved permit application? [Condition C.1.(a)]	Yes_X_No___ N/A ___RMK#___

NDITION OF CONTAINERS

	Are containers holding hazardous wastes in good condition? [Condition C.3.]	Yes X No__ N/A ___RMK#___
	a. If not, (e.g., severe rusting, structural defects) did the permittee transfer the hazardous waste from such a container to a container that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit and OAC rule 3745-55-71? [Condition C.3.]	Yes__No__ N/A _X__RMK#___
9.	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 C.4.]	Yes X No__ N/A ___RMK#___
10.	Is storage conducted in the container storage containment system as described in Condition C.1. of the permit and Section D of the approved permit application? [Condition C.5.(a)]	Yes X No__ N/A ___RMK#___
11.	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 C.5.(b)]	Yes X No__ N/A ___RMK#___
12.	Are lab-pack wastes handled in compliance with applicable storage requirements? [Condition C.5.(c)]	Yes X No__ N/A ___RMK#___
13.	Are lab-pack wastes packaged in drums containing absorbent material that is compatible with the wastes? [Condition C.5.(d)]	Yes X No__ N/A ___RMK#___

INSPECTIONS

14.	Is the permittee inspecting the container area weekly in accordance with OAC rules 3745-54-15, and 3745-54-73 and the approved inspection schedule (Section F) to detect leaking containers and deterioration of containers and the containment system? [Condition C.8.]	Yes X No__ N/A ___RMK#___
	a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken? [Condition C.8.]	Yes X No__ N/A ___RMK#___

b. On days when containerized waste are added or removed to and/or from any of the permitted areas for storage, does the permittee conduct inspections as described in Section F of the approved Part B permit application and maintain the inspection results in the facility operating record? [Condition C.8.] Yes X No__ N/A ___RMK#___

CONTAINMENT SYSTEM

15. Does the permittee maintain the containment system as described in Section D of the approved Part B permit application, including: [Condition C.6.] Yes X No__ N/A ___RMK#___

a. Sufficient design to contain 10% of the total volume of the containers or the volume of the largest container, whichever is greater? [Condition C.6.(b)] Yes X No__ N/A ___RMK#___

b. A system which is free of gaps and sufficiently impervious to contain leaks and spills? Yes X No__ N/A ___RMK#___

c. Equipped with a coating which is compatible with each waste stored in the area? Yes X No__ N/A ___RMK#___

d. *For those wastes which are deemed incompatible with liner material:* Has the permittee installed a separate secondary containment structure within the existing structure which is equipped with a compatible liner? Yes__No__ N/A _X_RMK#___

16. Has the permittee had a spill or leak of wastes or an accumulation of precipitation in the containment system? If so, Yes__No X_ N/A ___RMK#___

a. Are spilled or leaked wastes and accumulated precipitation removed from the sump or collection area in a timely manner? [Condition C.6.(c)] Yes__No__ N/A _X_RMK#___

b. Does removal of spilled/leaked wastes and accumulated precipitation occur within 24 hours from the time the spill or leak waste is discovered? [Condition C.6.(c)] Yes__No__ N/A _X_RMK#___

REQUIRED AISLE SPACE

17. Is the permittee maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in the event of an emergency to any area of the facility as required by OAC rule 3745-54-35? [Condition B.12.] — Yes X No ___ N/A ___ RMK#___

CLOSURE AND POST-CLOSURE

18. At closure of the container storage area, did the permittee remove all hazardous waste, hazardous waste residues, mixed waste and mixed waste residues from the containment system, in accordance with the procedures set forth in the approved closure plan (Section I of the permit application)? [Condition C.13.(a)] — Yes ___ No ___ N/A X RMK#___

19. During closure, if the permittee could not demonstrate that all contaminated soils could be removed, did the permittee close the unit and perform post-closure care following a plan approved by Ohio EPA? [Condition C.13.(b)] — Yes ___ No ___ N/A X RMK#___

CONTAINER STORAGE OF RESIDUAL WASTE

20. Is the permittee complying with the provisions of Section C-2E of the application as amended pursuant to Condition B.2.(b) of this permit? — Yes X No ___ N/A ___ RMK#___

LAND DISPOSAL RESTRICTION REQUIREMENTS

PROHIBITION AGAINST DILUTION

1. Has the permittee updated the annual Federal Facility Compliance Act Schedule? [OAC rule 3745-270-50; Condition B.36.] — Yes X No___ N/A ___RMK#___

2. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [OAC rule 3745-270-40 through 49; Condition B.36.(c)] — Yes___No X N/A ___RMK#___

   a. As a substitute for adequate treatment to achieve compliance with LDR treatment standards? — Yes___No___ N/A X RMK#___

   b. To circumvent the effective date of a prohibition (e.g., to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)? — Yes___No___ N/A X RMK#___

   c. To otherwise avoid a prohibition in OAC rule 3745-270-30 through -39? — Yes___No___ N/A X RMK#___

   d. To otherwise avoid a prohibition imposed by Section 3004(d) of RCRA? — Yes___No___ N/A X RMK#___

NOTE: *If the answer to any of Questions 2(a) through 2(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of OAC rule 3745-270-03 [Condition B.36.]. Dilution of wastes is permissible under some conditions. See OAC rule 3745-270-03(B).*

GENERATOR REQUIREMENTS

3. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No_ N/A ___RMK#___

   a. ***For determinations based solely on knowledge of the waste***: Is supporting data used to make this determination being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No___ N/A ___RMK#___

   b. ***For determinations based upon analytical testing***: Is a copy of waste analysis data being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No___ N/A ___RMK#___

Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g., wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [OAC rule 3745-270-07; Condition B.36.(e)] Yes X No__ N/A ___RMK#___

5. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [OAC rule 3745-270-07(A); Condition B.36.(e)] Yes X No__ N/A ___RMK#___

6. Does the entity generate any listed waste(s) which are restricted from land disposal? If so, Yes X No__ N/A ___RMK#___

   a. Do such wastes also exhibit hazardous waste characteristics as identified in OAC rules 3745-51-20 to 3745-51-24? Yes X No__ N/A ___RMK#___

   b. ***For listed wastes which also exhibit a characteristic*:** Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [OAC rule 3745-270-09(A)] Yes X No__ N/A ___RMK#___

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC rule 3745-270-09(B)].*

NOTIFICATION/CERTIFICATION

7. ***For wastes that do not meet treatment standards:*** Has the generator submitted a one-time written notice to the treatment/storage facility receiving the wastes, that wastes being received do not meet treatment standards? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No__ N/A ___RMK#___

   If so, does the notice including the following:

   a. EPA hazardous waste number? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No__ N/A ___RMK#___

   b. Appropriate treatment standard for the waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No__ N/A ___RMK#___

c. The manifest number associated with the first shipment of waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No__ N/A ___RMK#___

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No__ N/A ___RMK#___

e. Applicable wastewater/non-wastewater category [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No__ N/A ___RMK#___

f. For hazardous debris, list the contaminants subject to treatment, as described in paragraph (B) of OAC rule 3745-270-45; and an indication that these contaminants are being treated to comply with OAC rule 3745-270-45. — Yes X No__ N/A ___RMK#___

g. For contaminated soil list the constituents subject to treatment as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. — Yes X No__ N/A ___RMK#___

8. ***For wastes that meet treatment standards:*** Does the generator submit a one-time written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__No__ N/A _X_RMK#___

If so, does the notice/certification including the following:

a. EPA hazardous waste identification number? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__No__ N/A _X_RMK#___

b. The corresponding treatment standards and applicable prohibitions for the waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__No__ N/A _X_RMK#___

c. The manifest number associated with the shipment of waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__No__ N/A _X_RMK#___

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes__No__ N/A _X_RMK#__

e. Is the certification signed by the generator or an authorized representative? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes__No__ N/A _X_RMK#__

f. For contaminated soil list the constituents subject to treatment as described as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. Yes__No__ N/A _X_RMK#__

9. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years? [OAC rule 3745-270-07(A)(8); Condition B.36.(j)] Yes_X_No__ N/A ___RMK#__

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

NOTE: *The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate LDR wastes that do not meet treatment standards in tanks or containers. A LQG who stores LDR wastes on-site for greater than 90 days becomes a operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.*

NOTE: *The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [OAC rule 3745-270-50(E); 40 CFR 268.50(e)]*

10. Is the owner/operator storing LDR restricted wastes in containers? If so, is each container marked with the following information in accordance with OAC rule 3745-270-50(A)(2)(a) [Condition B.36(l)] Yes_X_No__ N/A ___RMK#__

a. The identification of the contents? Yes_X_No__ N/A ___RMK#__

b. The date which accumulation began? Yes_X_No__ N/A ___RMK#__

NOTE: *A TSD facility may store LDR wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [OAC rule 3745-270-50(B)]. During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.*

11. Are LDR wastes being stored at the facility for greater than one year? If so,

    a. Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [OAC rule 3745-270-50(B); Condition B.36(m)] — Yes X No___ N/A ___RMK#___

Waste, Pesticides and Toxics Division

Type of Document:
- ☐ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☒ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action

Facility Name : **U.S. Department of Energy - Portsmouth Gaseous Diffusion Plant**

Facility Location: **PO Box 700**

City: **Piketon** **State:** **Ohio**

U.S. EPA ID# **OH7 890 008 983**

Assigned Staff **W. Francis** **Phone:** **312-353-4921**

Name	Signature	Date
Author **W. Francis**	W. F	4/6/04
Regional Counsel	----------	
Section Chief **P. Little**	P Little	4-6-04
Branch Chief	----------	

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
   Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 07 2004

DE-9J

REPLY TO THE ATTENTION OF

Mr. William E. Murphie
Manager
U.S. Department of Energy
Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

Re: Letter of Acknowledgment
RCRA Compliance Evaluation Inspection
U.S. Department of Energy - Gaseous Diffusion Plant
Piketon, Ohio
OH7 890 008 983

Dear Mr. Murphie:

On February 4, 2004, the United States Environmental Protection Agency (U.S. EPA) issued U.S. Department of Energy Portsmouth Gaseous Diffusion Plant a Notice of Violation (NOV) which identified a violation of the Ohio Administrative Code at the Piketon, Ohio facility.

U.S. EPA received your March 3, 2004, response to the February 4, 2004, NOV.

This letter is to inform you that U.S. EPA has reviewed your response and determined that additional enforcement action need not be taken at this time.

This position does not limit your liability for compliance with all the applicable provisions of the Resource Conservation and Recovery Act, as amended. Your hazardous waste management operations will continue to be evaluated by U.S. EPA and the Ohio Environmental Protection Agency (OEPA) in the future.

If you have any questions regarding this letter, please contact Walt Francis of my staff at (312)353-4921.

Sincerely yours,

Paul Little, Chief
Compliance Section #2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

cc: Melody Stewart, OEPA-Southeast District Office

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 50% Recycled Paper (20% Postconsumer)

Waste, Pesticides and Toxics Division

Type of Document:
- ☒ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action

Facility Name : U.S. Department of Energy - Portsmouth Gaseous Diffusion Plant

Facility Location: P.O. Box 700

City: Piketon **State:** Ohio

U.S. EPA ID# OH7 890 008 983

Assigned Staff W. Francis **Phone:** 312-353-4921

Name	Signature	Date
Author **W. Francis**	W. F	2/2/04
Regional Counsel **M. McClary**	Mike McClary concurrence 2/2/04 see email	2/2/04
Section Chief **P. Little**	P Little	2-3-04
Branch Chief	---------- -	

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's. Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

7001 0320 0006 0295 1389

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

FEB 04 2004

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Russell Vranicar
U.S. Department of Energy
Portsmouth Site Office
P.O. Box 700
Piketon, Ohio 45661-0700

Mr. Gilbert Drexel
Bechtel Jacobs Company LLC
P.O. Box 700
Piketon, Ohio 45661-0700

Re: Notice of Violation
RCRA Compliance Inspection
U.S. Department of Energy
Piketon, Ohio
OH7 890 008 983

Dear Messrs:

On June 10 and 11, 2003, representatives of the United States Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) inspected the U.S. Department of Energy (U.S. DOE) Portsmouth Gaseous Diffusion Plant located near Piketon, Ohio. The purpose of the inspection was to evaluate compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection checklists for your reference.

Based on information provided by U.S. DOE and Bechtel Jacobs personnel, review of records, and physical observations by the inspectors, U.S. EPA finds that U.S. DOE is in violation of the following requirement of the Ohio Administrative Code (OAC) and the United States Code of Federal Regulations (CFR):

- A large quantity handler of universal waste may not accumulate universal waste for longer than one year from the date the universal waste is generated or received from

Recycled/Recyclable . Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

another handler, unless such activity is solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal. See, OAC §§ 3745-273-35(A), (B) [40 CFR §§ 273.35(a), (b)]. The handler bears the burden of proving that such activity was solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal. See, OAC §§ 3745-273-35(B) [40 CFR § 273.35(b)].

During the records review portion of the inspection the inspectors reviewed a January 22, 2002, Bill of Lading for a shipment of three drums of nonspillable batteries, and thirty seven containers of acid filled batteries from U.S. DOE Portsmouth to Superior Special Services in Columbus, Ohio. It appeared that U.S. DOE Portsmouth had stored lead acid batteries for greater than one year, since the last shipment on January 22, 2002.

According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above requirements.

You should submit your response to Walt Francis, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Walt Francis of my staff at (312) 353-4921.

Sincerely yours,

Paul Little

Paul Little, Chief
Compliance Section # 2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosure

cc: Melody Stewart, OEPA-Southeast District Office

RCRA HAZARDOUS WASTE GENERATOR INSPECTION CHECKLIST

mpany: U.S. Department of Energy - Portsmouth Gaseous Diffusion Plant EPA ID#: OH7 890 008 983

reet: US Route 23 S City: Piketon

County: Pike State: Ohio Zip: 45661

Mailing Address: PO Box 700, Piketon, Ohio 45661-0700

(If different from above)

Telephone: 740-897-5010 Fax #: _____

Owner/ Operator: Federal Government/Co-Operator Bechtel Jacobs Company LLC

(If different from above)

Street: _____

City: _____ State: Ohio Zip: _____

Inspection Date(s): 6/9/03 - 6/10/03 Time(s): 8:00 am -

Inspection Announced? _____ Yes ___X___ NO If so, how much advance notice given? _____

	Name	Affiliation	Telephone
Inspectors:	Melody Stewart	OEPA	740-380-5256
	Walt Francis	U.S. EPA	312-353-4921
Facility Representative:	CLIFF Brock	BECHTEL-JACOBS	740-897-3379
	MATT WICK	U.S. DOE	740-897-5010
	Mary Williams	Bechtel Jacobs	740-897-2700

Complete All Other Applicable Checklists

Generator Classification	Waste Management Activity
_____ Conditionally Exempt SQG (CESQG)	___X___ Containers
_____ Small Quantity Generator (SQG)	_____ Tank(s)
___X___ Large Quantity Generator (LQG)	_____ Land Disposal Requirements (LDR)
_____ No Generation	_____ Used Oil
	___X___ Universal Waste
	_____ Other

CESQG: < 100 Kg. (approximately 25-30 gallons) of waste in a calendar month

G: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month

: >1,000 Kg. (~300 gallons) of waste in a calendar month or > 1 Kg. of acutely hazardous waste in a calendar month

TE: *To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds*

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

POLLUTION PREVENTION

Note to the Inspector: This checklist has been developed to help the division in gathering general information about the pollution prevention (P2) practices that the company may have initiated or attempted to initiate. The checklist is also used to:

- Facilitate P2 discussions;
- Identify barriers to P2;
- Define the P2 universe;
- Identify the need for future P2 initiatives;
- Identify partnership opportunities; and
- Link companies with better P2 resources.

As a prelude to completing this checklist the inspector should use the following list of questions as a way to initiate a dialogue concerning P2:

1. Have you tried to reduce the volume of waste (hazardous and nonhazardous) that you generate?

2. What is the largest waste stream that you generate?

3. How important would it be to you to eliminate that waste stream?

4. Does your company understand the reduced regulatory burden and cost saving benefits that eliminating or reducing a waste stream can have?

5. Could you use better housekeeping practices to reduce the amount of waste that you generate?

If the company responds with one of the answers below, the appropriate box should be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided or in the remarks section.

1. Has the company undertaken any P2 activities to reduce the amount of hazardous waste generated? Yes ✓ No__ N/A ___ RMK#___

   a. ***If so,*** what has the company done to minimize hazardous waste generation?

   - ☐ A change in the process resulting in less waste.
   - ☐ A change in the product resulting in less waste.
   - ☐ Use of fewer and less toxic hazardous raw materials.
   - ☐ Better operations/improved housekeeping.
   - ☐ On-site recycling/reuse of hazardous materials.
   - ☒ Sending waste off-site for recycling/reuse.
   - ☐ Other activities (specify): _____

   b. ***If so,*** what hazardous wastes have been addressed?

   - ☐ Solvents

- ☐ Industrial process wastes (sludges, slags, contaminated waste waters, etc)
- ☐ Contaminated oils/hydraulic fluids
- ☐ Off-spec chemicals
- ☒ Fluorescent light bulbs
- ☒ Used batteries
- ☐ Shop rags
- ☐ Other (specify): _____

c. ***If not,*** why hasn't the company considered P2?

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

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

3. Would the company be interested in receiving additional information from Ohio EPA about P2? Yes X No___ N/A ___RMK#___

4. Did you give the company information about P2 during the inspection? Yes X No___ N/A ___RMK#___

5. Would the company like a P2 assessment? Yes___ No X N/A ___RMK#___

If the company would like a P2 assessment done at their facility, the inspector must give the company representative a copy of the Pollution Prevention Assessments for Hazardous Waste Generators document and discuss it with them.

6. If the company does not want a P2 assessment, why not? Company has program in place.

REMARKS

LARGE QUANTITY GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] — Yes X No ☐ N/A ___ RMK#_

2. Has the generator obtained an identification number? [3745-52-12] — Yes X No ☐ N/A ___ RMK#___

3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41] — Yes X No ☐ N/A ___ RMK#___

WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? If so: — Yes___ No X N/A ___ RMK#___

   a. Has the generator notified U.S. EPA of export/import activity? [3745-52-53] — Yes ___ No ☐ N/A X RMK#___

   b. Has the generator complied with special manifest requirements? [3745-52-54] — Yes ___ No ☐ N/A X RMK#___

   c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] — Yes ___ No ☐ N/A X RMK#___

   d. Has an annual report been submitted to U.S. EPA? [3745-52-56] — Yes ___ No ☐ N/A X RMK#___

   e. Are export related documents being maintained on-site? [3745-52-57] — Yes ___ No ☐ N/A X RMK#___

GENERATOR CLOSURE REQUIREMENTS

5. Has the generator closed any <90-day accumulation unit(s) since the date of the last inspection? If so: — Yes X No___ N/A ___ RMK#___

   a. Describe the unit(s) which the generator has closed.

   X- 7446

   b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] — Yes X No ☐ N/A ___ RMK#___

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

Inspection Cols. - Closure of X-70/.

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

REMARKS

MANIFEST REQUIREMENTS

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

Are you aware of what the statement that you sign on the manifest says? Yes X No___

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

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

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

2. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] — Yes X No ☐ N/A ___RMK#___

NOTE: ***U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]***

3. Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)] — Yes X No ☐ N/A ___RMK#___

NOTE: ***The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].***

4. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: — Yes___ No X N/A ___RMK#___

   a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] — Yes ___ No ☐ N/A X RMK#___

5. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)] — Yes X No ☐ N/A ___RMK#___

6. Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not: — Yes X No___ N/A ___RMK#___

   a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)] — Yes ___ No ☐ N/A X RMK#___

b. If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]

Yes ___ No ☐ N/A ☒ RMK#___

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

Yes ☒ No ☐ N/A ___ RMK#___

REMARKS

PERSONNEL TRAINING

1. Does the generator keep records required by 3745-65-16(D) including:

   a. Job titles, as they relate to hazardous waste management, and the name of each employee filling each job? Yes ☒ No ☐ N/A ___ RM ___

   b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position? Yes ☒ No ☐ N/A ___ RMK#___

   c. Type and amount of both introductory and continuing training to be given to each person filling a position? Yes ☒ No ☐ N/A ___ RMK#___

   d. Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)? Yes ☒ No ☐ N/A ___ RMK#___

NOTE: ***If the facility's business practices precludes written job titles/descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be used to document that all necessary employees have been trained.***

2. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to their positions? [3745-65-16(A)(2) Yes ☒ No ☐ N/A ___ RMK#___

3. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]

   a. Emergency procedures? Yes ☒ No ☐ N/A ___ RMK#___

   b. Emergency equipment? Yes ☒ No ☐ N/A ___ RMK#___

   c. Emergency systems? Yes ☒ No ☐ N/A ___ RMK#___

4. Does emergency training described in 3(a), (b) and (c) above include, *where applicable*: [3745-65-16(A)(3)(a-f)

   a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? Yes ☒ No ☐ N/A ___ RMK#___

b. Key parameters for automatic waste feed cut-off systems? Yes X No ☐ N/A ___RMK#___

c. Communication or alarm system? Yes X No ☐ N/A ___RMK#___

d. Response procedures for fire/explosions? Yes X No ☐ N/A ___RMK#___

e. Response to groundwater contamination incidents? Yes X No ☐ N/A ___RMK#___

f. Shutdown procedures? Yes X No ☐ N/A ___RMK#___

5. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes X No ☐ N/A ___RMK#___

6. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes X No ☐ N/A ___RMK#___

7. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes X No ☐ N/A ___RMK#___

8. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)] Yes X No ☐ N/A ___RMK#___

9. Are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes X No ☐ N/A ___RMK#___

10. ***Optional***: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifests, etc.

Job Performed	**Name of Employee**	**Date(s)Trained**

REMARKS

CONTINGENCY PLAN

1. Does the generator have a contingency plan which describes the following: [3745-65-52(A) through (F)]

   a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? — Yes X No ☐ N/A ___ RMK#___

   b. Arrangements/agreements with emergency authorities? [3745-65-37] — Yes X No ☐ N/A ___ RMK#___

   c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? — Yes X No ☐ N/A ___ RMK#___

   d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? — Yes X No ☐ N/A ___ RMK#___

   e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary? — Yes X No ☐ N/A ___ RMK#___

NOTE: ***If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]***

2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] — Yes X No ☐ N/A ___ RMK#___

3. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)(B)] — Yes X No ☐ N/A ___ RMK#___

4. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] — Yes X No ☐ N/A ___ RMK#___

EMERGENCY COORDINATOR

5. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] — Yes X No ☐ N/A ___ RMK#___

NOTE: ***The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan***

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so: Yes___ No X N/A ___RMK#___

   a. Was the contingency plan implemented? [3745-65-51(B)] Yes ___ No ☐ N/A X RMK#___

   b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)? Yes ___ No ☐ N/A X RMK#___

   c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)? Yes ___ No ☐ N/A X RMK#___

NOTE: ***OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.***

REMARKS

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

1. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31] — Yes X No ☐ N/A ___ RMK#

2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]

   a. Internal alarm system? — Yes X No ☐ N/A ___ RMK#___

   b. Emergency communication device? — Yes X No ☐ N/A ___ RMK#___

   c. Portable fire control, spill control and decon equipment? — Yes X No ☐ N/A ___ RMK#___

   d. Water of adequate volume/pressure? — Yes X No ☐ N/A ___ RMK#___

3. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33] — Yes X No ☐ N/A ___ RMK#___

4. Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33] — Yes X No ☐ N/A ___ RMK#___

5. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32)*? [3745-65-34] — Yes X No ☐ N/A ___ RMK#___

6. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35] — Yes X No ☐ N/A ___ RMK#___

7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)] — Yes ✓ No ☐ N/A ___ RMK#___

   a. Where authorities have declined to enter into arrangements/agreements, has the generator documented such a refusal? [3745-65-37(B)] — Yes ___ No ☐ N/A X RMK#___

REMARKS

GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)] — Yes ☒ No___ N/A ___RMK#___

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

2. Does the generator ensure that satellite accumulation area(s):

   a. Are at or near a point of generation? — Yes X No ☐ N/A ___RMK#___

   b. Are under the control of the operator of the process generating the waste? — Yes X No ☐ N/A ___RMK#___

   c. Do not exceed a total of 55 gallons of hazardous waste? — Yes X No___ N/A ___RMK#___

   d Do not exceed one quart of acutely hazardous waste at any one time? — Yes X No ☐ N/A ___RMK#___

   e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? — Yes X No ☐ N/A ___RMK#___

NOTE: ***The 55 gallon limit applies to the area itself, and not to each individual waste stream accumulated in the area. The inspector should refer to Ohio EPA's November 1994 Guidance on the Location of Satellite Accumulation Areas.***

3. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so: — Yes___ No X N/A ___RMK#___

   a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? — Yes ___ No ☐ N/A X RMK#___

   b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? — Yes ___ No ☐ N/A X RMK#___

USE AND MANAGEMENT OF CONTAINERS

1. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] — Yes X No ☐ N/A ___RMK#___

5. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes X No ☐ N/A ___ RMK#___

6. Are hazardous wastes stored in containers which are:

   a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes X No ☐ N/A ___ RMK#___

   b. In good condition? [3745-66-71] Yes X No ☐ N/A ___ RMK#___

   c. Compatible with wastes stored in them? [3745-66-72] Yes X No ☐ N/A ___ RMK#___

   d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes X No ☐ N/A ___ RMK#___

7. Is the container accumulation area(s) inspected weekly? [3745-66-74] (*Note location in general information section of checklist)* Yes X No ☐ N/A ___ RMK#___

   a. Are inspections recorded in a log or summary? [3745-66-74] Yes X No ☐ N/A ___ RMK#___

8. For ignitable and/or reactive hazardous waste(s):

   a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes X No ☐ N/A ___ RMK#___

   b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] Yes X No ☐ N/A ___ RMK#___

PRE-TRANSPORT REQUIREMENTS

9. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] Yes X No ☐ N/A ___ RMK#___

10. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes X No ☐ N/A ___ RMK#___

11. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes X No ☐ N/A ___ RMK#___

C:\WINDOWS\TEMP\LQg.wpd

REMARKS

LARGE QUANTITY UNIVERSAL WASTE HANDLER INSPECTION CHECKLIST

npany: U.S. Department of Energy-Portsmouth Gaseous Diffusion Plant USEPA ID#: OH7 890 008 983

Street: US Route 23 S City: Piketon

County: Pike State: Ohio ZIP: 45661

Mailing Address PO Box 700, Piketon, Ohio 45661-0700
(IF DIFFERENT FROM ABOVE)

Telephone: (740)897-5010 Fax: ( )

Owner/ Operator: Federal Government/Co-Operator Bechtel Jacobs Company LLC
(IF DIFFERENT FROM ABOVE)

Street:

City: State: Zip:

Inspection Date(s): 6/9/03 - 6/10/03 Time(s): 8:00 am -

Inspection Announced? _____ YES ___X__ NO If so, how much advance notice given? _____

Inspectors: Melody Stewart, OEPA and Walt Francis, U.S. EPA

Facility Rep(s):

WASTE MANAGEMENT ACTIVITY	
X	Containers
	Tank(s)
	Other (specify)

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

LARGE QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

GENERAL REQUIREMENTS

1. Has the LQUWH obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)] — Yes X No ☐ N/A ___ RMK#___

PROHIBITIONS

2. Did the LQUWH dispose of universal waste? [3845-273-31(A)] — Yes ☐ No X N/A ___ RMK#___

3. Did the LQUWH dilute or treat universal waste, except when responding to releases or by managing specific wastes as provided in OAC 3745-273-33? [3745-273-31(B)] — Yes ☐ No X N/A ___ RMK#___

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES:

4. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)] — Yes ___ No ☐ N/A X RMK#___

5. If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? — Yes ___ No ☐ N/A X RMK#___

6. Does the LQUWH conduct any of the following activities:

   a. Sort batteries by type? — Yes X No___ N/A ___ RMK#___

   b. Mix battery types in one container? — Yes___ No X N/A ___ RMK#___

   c. Discharge batteries to remove the electric charge? — Yes___ No X N/A ___ RMK#___

   d. Regenerate used batteries? — Yes___ No X N/A ___ RMK#___

   e. Disassemble them into individual batteries or cells? — Yes___ No X N/A ___ RMK#___

   f. Remove batteries from consumer products? — Yes___ No X N/A ___ RMK#___

   g. Remove the electrolyte from the battery? — Yes___ No X N/A ___ RMK#___

If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-33(A)(2)] — Yes ☐ No___ N/A X RMK#___

If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)] — Yes ___ No ☐ N/A X RMK#___

a. If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)] — Yes ___ No ☐ N/A X RMK#___

b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)] — Yes ___ No ☐ N/A X RMK#___

8. Are the battery(ies) or container(s) of batteries located with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-34(A)] — Yes X No ☐ N/A ___RMK#___

UNIVERSAL WASTE PESTICIDES

9. Does the LQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-33(B)(1)] — Yes ___ No ☐ N/A X RMK#___

10. If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-33(B)(2)] — Yes ___ No ☐ N/A X RMK#___

11. If the pesticide is stored in a tank, are the requirements of 3745-66-90 through 66-992, except for paragraph (C) of 3745-66-97; rule 3745-66-991 and 3745-66-992 of the OAC met? [3745-273-33(B)(3)] — Yes ___ No ☐ N/A X RMK#___

12. Is pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-33(B)(4)] — Yes ___ No ☐ N/A X RMK#___

13. Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)] — Yes ___ No ☐ N/A X RMK#___

14. Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides?" [3745-273-34(B)(1)&(2)]

Yes ___ No ☐ N/A X RMK#___

UNIVERSAL WASTE THERMOSTATS

15. Are thermostats that show evidence of leakage, spillage or damage that could cause leaks, properly contained? [3745-273-33(C)(1)]

Yes ___ No ☐ N/A X RMK#___

16. If the thermostats are contained, are the containers closed, structurally sound, compatible with contents of the thermostats and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(C)(1)]

Yes ___ No ☐ N/A X RMK#___

17. If the mercury-containing ampules are removed, does the LQUWH: [3745-273-33(C)(1)]

a. Remove the ampules in a manner to prevent breakage and is the removal done over a containment device? [3745-273-33(C)(2)(a)(b)]

Yes ___ No ☐ N/A X RMK#___

b. Have a clean-up system readily available to transfer spilled material to another container that meets the requirements of OAC 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-33(C)(2)(c)(d)]

Yes ___ No ☐ N/A X RMK#___

c. Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-33(C)(2)(e)]

Yes ___ No ☐ N/A X RMK#___

d. Ensure employees are thoroughly familiar with proper waste handling and emergency procedures? [3745-273-33(C)(2)(f)]

Yes ___ No ☐ N/A X RMK#___

e. Ensure removed ampules are stored in closed, non-leaking containers that are in good condition? [3734-273-33(C)(2)(g)]

Yes ___ No ☐ N/A X RMK#___

f. Pack removed ampules in containers with packing material to prevent breaking during storage, handling and transportation? [3745-273-33(C)(2)(h)]

Yes ___ No ☐ N/A X RMK#___

18. If mercury or clean-up residues resulting from spills or leaks or other wastes are generated, are they evaluated to determine whether they exhibit a characteristic of a hazardous waste? [3745-273-33(C)(3)(a)] — Yes ___ No ☐ N/A X RMK#___

a. If the waste is characteristic, was it managed in compliance with 3745-50 through 3745-69? (*The handler is considered the generator of the mercury, residues, and/or other waste and is subject to Chapter 3745-52)* [3745-273-33(C)(3)(b)] — Yes ___ No ☐ N/A X RMK#___

b. If the mercury, residues and/or other waste are not hazardous, are they managed in compliance with applicable law? [3745-273-33(C)(3)(c)] — Yes ___ No ☐ N/A X RMK#___

19. Are the thermostats or containers of thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)" [3745-273-34] — Yes ___ No ☐ N/A X RMK#___

ACCUMULATION TIME

20. Is the waste accumulated for less than one year? [3745-273-35(A)] — Yes X No X N/A ___RMK#___

a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on handler to demonstrate) [3745-273-35(B)] — Yes X No ☐ N/A ___RMK#___

NOTE: Accumulation is defined as date generated or date received from another handler.

21. Has the length of time the universal waste has been accumulated documented by ***one*** of the following: [3745-273-35(C)] — Yes X No ☐ N/A ___RMK#___

a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-35(C)(1)] — Yes X No___ N/A ___RMK#___

b. Marking or labeling the individual item of universal waste with the date that it became a waste or was received? [3745-273-35(C)(2)] — Yes___ No X N/A ___RMK#___

c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-35(C)(3)] — Yes___ No X N/A ___RMK#___

d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-35(C)(4)] — Yes__ No X N/A ___RMK#__

e. Placing the universal waste in a specific accumulation area and identifying the earliest that any universal waste in the area became a waste or was received? [3745-273-35(C)(5] — Yes__ No X N/A ___RMK#__

f. Any other method which clearly demonstrates the length of time the universal waste has been accumulated from the date it became a waste or is received? [3745-273-35(C)(6)] — Yes__ No X N/A ___RMK#__

EMPLOYEE TRAINING

22. Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36] — Yes X No ☐ N/A ___RMK#___

RESPONSE TO RELEASES

23. Were releases of universal waste and other residues immediately contained? [3745-273-37(A)] — Yes ___ No ■ N/A X RMK#___

24. Was the released material characterized? [3745-273-37(B)] — Yes ___ No ☐ N/A X RMK#___

25. If the released material was a hazardous waste, was it managed as required in OAC 3745-50 through 3745-69? *(If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52)* [3745-273-37(C)] — Yes ___ No ☐ N/A X RMK#___

OFF-SITE SHIPMENTS

NOTE: ***If a LQUWH self-transports wastes, then the handler must comply with the Universal Waste transporter requirements.***

26. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)] — Yes X No ☐ N/A ___RMK#___

NOTE: ***LQUWHs are prohibited to send waste to any other facility.***

27. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-38(C)] — Yes X No ☐ N/A ___RMK#___

28. Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)] — Yes X No ☐ N/A ___RMK#___

29. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following: — Yes X No ☐ N/A ___RMK#___

a. Receive the waste back? [3745-273-38(E)(1)] — Yes X No___ N/A ___RMK#___

b. Agree to where shipment will be sent? [3745-273-38(E)(2)] — Yes X No___ N/A ___RMK#___

30. If a handler rejects a partial or full load from another handler, does the receiver handler contact the originating handler and discuss one of the following: — Yes X No ☐ N/A ___RMK#___

a. Sending the waste back to originating handler? [3745-273-38(F)(1)] — Yes X No___ N/A ___RMK#___

b. Sending the shipment to a destination facility? [3745-273-38(F)(2)] — Yes X No___ N/A ___RMK#___

31. If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)] — Yes X No ☐ N/A ___RMK#___

32. If the handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-38(H)] — Yes X No ☐ N/A ___RMK#___

TRACKING UNIVERSAL WASTE SHIPMENTS

33. Are universal waste received from another handler? If so: Yes___ No X N/A ___RMK#___

a. Is a record of each shipment kept? [3745-273-39(A)] Yes ___ No ☐ N/A X RMK#___

NOTE: ***This record can be in the form of a log, invoice, manifest, bill of lading, or other shipping document. This also applies to question No. 35(a).***

34. Does the record include the following:

a. Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)] Yes ___ No ☐ N/A X RMK#___

b. Quantity of each type of universal waste? [3745-273-39(A)(2)] Yes ___ No ☐ N/A X RMK#___

c. Date received? [3745-273-39(A)(3)] Yes ___ No ☐ N/A X RMK#___

35. Is universal waste shipped to another handler? If so: Yes X No___ N/A ___RMK#___

a. Is a record of each shipment kept? [3745-273-39(B)] Yes X No ☐ N/A ___RMK#___

36. Does the record include the following?

a. Name and address of universal waste handler, destination facility, or foreign destination? [3745-273-39(B)(1)] Yes X No ☐ N/A ___RMK#___

b. Quantity of each type of universal waste? [3745-273-39(B)(2)] Yes X No ☐ N/A ___RMK#___

c. Date shipped? [3745-273-39(B)(3)] Yes X No ☐ N/A ___RMK#___

37. Are records kept for three years? [3745-273-39(C)(1)(2)] Yes X No ☐ N/A ___RMK#___

EXPORTS

38. Is waste being sent to a foreign destination? If so: Yes___ No X N/A ___RMK#___

a. Does the large quantity handler comply with primary exporter requirements in OAC rules 3745-52-53 and 3745-52-57, and paragraphs (A)(1) - (A)(6) and (B) of 3745-52-56? [3745-273-40(A)] Yes ___ No ☐ N/A X RMK#___

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA "Acknowledgment of Consent" 37845-52-50 to -52-57? [3745-273-40(B)]

Yes ___ No ☐ N/A X RMK#___

c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)]

Yes ___ No ☐ N/A X RMK#___

REMARKS

STATE PART B HAZARDOUS WASTE PERMIT
INSPECTION CHECKLIST

DIVISION OF HAZARDOUS WASTE MANAGEMENT
OHIO EPA
June 2003

Table of Contents
Portsmouth Gaseous Diffusion Plant
04-66-0680

RCRA Inspection Checklist

General Conditions of Permit . . . 2
- General Permit Compliance and Activities . . . 2

Permit Modification, Revision, Revocation . . . 5

Site Entry - Availability of Records . . . 7

Recordkeeping Requirements . . . 7
- Confidentiality . . . 7
- Operating Record . . . 7
- Annual Report Requirement . . . 9
- Sampling/monitoring Recordkeeping Requirements . . . 9
- Waste Minimization Requirements . . . 10

Off-site Shipments/manifest Requirements . . . 11
- Manifest Requirements/wastes Received On-site . . . 11

Waste Analysis/waste Analysis Plan . . . 11
- General Requirements . . . 12
- Waste Analysis Quality Assurance Requirements . . . 12

General Inspection Requirements . . . 14

Security Provisions/facility Operation . . . 15

Personnel Training . . . 16

Required Equipment . . . 16

Contingency Plan Requirements . . . 17
- Emergency Procedures . . . 17
- Emergency Authorities . . . 18
- Emergency Coordinator . . . 18
- Amendment of Plan . . . 18
- Implementation of Plan . . . 19

Contingency Plan Requirements . . . 20
- Closure Plan/amendment . . . 20
- Closure Activities . . . 20

Requirements for Ignitable, Reactive or Incompatible Wastes . . . 22

Storage of Hazardous Wastes in Containers . . . 24
- Condition of Containers . . . 25
- Inspections . . . 25
- Containment System . . . 26
- Required Aisle Space . . . 27
- Closure and Post-closure . . . 27
- Container Storage of Residual Waste . . . 27

Land Disposal Restriction Requirements . . . 28
- Prohibition Against Dilution . . . 28
- Generator Requirements . . . 28
- Notification/certification . . . 29
- Storage of Land Disposal Restricted Wastes

OHIO PART B PERMITTED FACILITY
RCRA INSPECTION CHECKLIST

ility: Portsmouth Gaseous Diffusion Plant Ohio Permit #: 04-66-0680

Address: 3930 U.S. Route 23 South USEPA ID#: OH7890008983
Piketon, OH 45661 Facility Phone: _____

County: Pike Time: _____ - _____

Inspection Date: 6/9/03 - 6/10/03

Advance notice of inspection given? ____(Yes) ___X___(No)
If so, how far in advance? _____

	Name	***Agency/Title***	***Phone***
Inspector(s):	Melody Stewart	OEPA	740-380-5256
	Walt Francis	U.S. EPA	312-353-4921
Facility Representative(s):	CLIFF BOOKS	BECHTEL JACOBS	740-897-3579
	MATT VICK	U.S. DOE	740-897-5010
	MARY WILLIAMS	BECHTEL JACOBS	740-897-2700

Is facility operating as a generator? Yes ___X___ No _____

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

PERMIT STATUS

Permit Issued: March 15, 2001
Permit Effective Date: March 15, 2001
Permit Expiration Date: March 15, 2006

STORAGE		TREATMENT		DISPOSAL	
X	Container		Tank		Injection Well
	Tank		Surface Impoundment		Landfill
	Waste Pile		Incinerator		Land Application
	Surface Impoundment		Thermal Treatment		Surface Impoundment

GENERAL CONDITIONS OF PERMIT

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1. Has the expiration date of the permit passed? If so: Yes___No_X_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 _X_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? (Or upon a later date if the permittee can demonstrate good cause for late submittal.) [Condition A.6.(a)] Yes___No___ N/A _X_RMK#___

NOTE: *The permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:*

   A. The permittee has submitted a timely and complete application for a renewal permit under OAC rule 3745-50-40; and

   B. Through no fault of the permittee, a new permit has not been issued pursuant to OAC rule 3745-50-40 on or before the expiration date of the permit. [Condition A.6.(b)]

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.26] Yes_X_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? [Condition A.1.(b) and A.5] Yes_X_No___ N/A ___RMK#___

4. Have any provisions of the permit been identified as invalid? [Condition A.4.] Yes___No_X_N/A ___RMK#___

5. Has the facility identified any instances of noncompliance with the permit, RC Chapter 3734. or the rules adopted thereunder, which may endanger human health or the environment? If so: Yes___No_X_N/A ___RMK#___

   a. Did the facility immediately report orally the following to Ohio EPA's Emergency Response Section within 24 hours of becoming aware of the circumstance(s): [Condition A.20.(a)]

i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and — Yes__No__ N/A X 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 or operator? — Yes__No__ N/A X RMK#__

B. Name, address and telephone number of the facility? — Yes__No__ N/A X RMK#__

C. Name and quantity of material(s) involved? — Yes__No__ N/A X RMK#__

D. The extent of injuries, if any? — Yes__No__ N/A X RMK#__

E. An assessment of the actual or potential hazard to the environment and human health outside the facility where this is applicable? — Yes__No__ N/A X RMK#__

F. Estimated quantity and disposition of recovered material that resulted from the incident? — Yes__No__ N/A X RMK#__

6. Did the permittee provide a written report to Ohio EPA's Emergency Response Section and DHWM, SEDO within five days of the time the permittee became aware of the circumstances reported in Question 5? [Condition A.21.] If so did the report contain: — Yes__No__ N/A X RMK#__

a. A description of the noncompliance and its cause (including exact dates and times)? — Yes__No__ N/A X RMK#__

b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? — Yes__No__ N/A X RMK#__

c. Steps taken or planned to minimize the impact on human health and the environment and to reduce and prevent recurrence of the noncompliance? — Yes__No__ N/A X RMK#__

Note: *The permittee need not comply with the five day written report requirement if the director, upon go cause shown by the permittee, waives that requirement and the permittee submits a written report within 15 days of the time the permittee becomes aware of the circumstances. [Condition A.21.(c)]*

7. Has the permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8] — Yes__No__ N/A X RMK#__

8. Has the permittee identified any other instances of noncompliance not provided for in Question 5? — Yes__No__ N/A X RMK#__

   a. If so, did the permittee report to the director within a month of the time at which the permittee is aware of such noncompliance? [Condition A.22.] — Yes__No__ N/A X RMK#__

   b. Do the reports provided contain the information set forth in Condition A.20? — Yes__No__ N/A X RMK#__

9. Has the permittee planned any physical alterations or additions to the permitted facility? — Yes__No X N/A __RMK#__

   a. If so, has the facility provided Ohio EPA with notice of such changes? [Condition A.15] — Yes__No__ N/A X RMK#__

Note: *Such notification does not waive the permittee's duty to comply with the permit pursuant to Condition A.5.*

REMARKS

RMIT MODIFICATION, REVISION, REVOCATION

	Has the permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.] Contingency Plan - Emergency Cond.	Yes X No___ N/A ___RMK#___
2.	Has the permit been transferred to a new owner or operator? [Condition A.18.] If so,	Yes___No X N/A ___RMK#___
	a. Has the transfer been conducted in accordance with R.C. Chapter 3734. and the rules adopted thereunder? [Condition A.18.]; and	Yes___No___ N/A X RMK#___
	b. Before transferring ownership did the permittee notify the new owner in writing of the requirements of R.C. Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.18.]	Yes___No___ N/A X RMK#___
3.	Has the permittee submitted reports of compliance or noncompliance with, or any progress reports on the requirements contained 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 X RMK#___
4.	Has the permittee furnished relevant information which Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, or to determine compliance with the permit? [Condition A.10]	Yes X No___ N/A ___RMK#___
5.	Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10]	Yes X No___ N/A ___RMK#___
6.	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 HWFB? If so,	Yes___No X N/A ___RMK#___
	a. Has the permittee promptly submitted such facts or corrected information to the appropriate entity? [Condition A.24.]	Yes___No___ N/A X RMK#___

7. Is the permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications to the application? [Condition A.14.(c)] Yes X No__ N/A ___RMK#___

8. Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14.(c)] Yes X No__ N/A ___RMK#___

REMARKS

ENTRY - AVAILABILITY OF RECORDS

1. As specified in Condition A.11., has the permittee allowed the director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection, 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 X No ___ N/A ___ RMK#___

   b. Have access to and copy any records required to be kept under the conditions of the permit? Yes X No ___ N/A ___ RMK#___

   c. Inspect at reasonable times facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit? Yes X No ___ N/A ___ RMK#___

   d. Sample, document, or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by R.C. Chapter 3734. and the rules adopted thereunder? Yes X No ___ N/A ___ RMK#___

RECORDKEEPING REQUIREMENTS

CONFIDENTIALITY

1. Has the permittee requested confidentiality of any information of the permit in accordance with R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.25.] Yes ___ No X N/A ___ RMK#___

OPERATING RECORD

2. Is the permittee maintaining a written operating record at the facility as set forth in OAC rule 3745-54-73 and Condition B.22. of the permit which contains the following elements:

   a. A description and the quantity of each hazardous waste received? RFD DataBase. Yes X No ___ N/A ___ RMK#___

b. Method(s) and date(s) of treatment, storage or disposal at the facility? Yes X No___ N/A ___RMK#___

c. The location of each hazardous waste within the facility and the quantity at each location? Yes X No___ N/A ___RMK#___

3. Is the permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents as part of its operating record: [Condition A.28.]

a. Waste analysis plan in accordance with OAC rule 3745-54-13 and the conditions of the permit? Yes X No___ N/A ___RMK#___

b. Contingency plan in accordance with OAC rule 3745-54-53 and the conditions of the permit? Yes X No___ N/A ___RMK#___

c. Closure plan in accordance with OAC rule 3745-55-12 and the conditions of the permit? Yes X No___ N/A ___RMK#___

d. Personnel training plan and records required by OAC rule 3745-54-16 and the conditions of the permit? Yes X No___ N/A ___RMK#___

e. Inspection schedules developed in accordance with OAC rules 3745-54-15 and 3745-55-74 and the conditions of the permit? Yes X No___ N/A ___RMK#___

4. Have any of the documents identified in Question #3 been revised as required by the permit? If so, Yes X No___ N/A ___RMK#___

a. Has the permittee submitted the revisions to Ohio EPA? [Condition A.28.(b)] Yes X No___ N/A ___RMK#___

b. Has the permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.28.(b)] Yes X No___ N/A ___RMK#___

5. Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from the date of inspection? [Condition A.28.(c)] Yes X No___ N/A ___RMK#___

IUAL REPORT REQUIREMENT

6. 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 and the conditions of the permit? [Condition B.25.] Yes X No___ N/A ___RMK#___

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

7. In compliance with Condition A.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 X No___ N/A ___RMK#___

   b. Individual(s) who performed the sampling or measurement? Yes X No___ N/A ___RMK#___

   c. Date(s) analyses were performed? Yes X No___ N/A ___RMK#___

   d. Individual(s) who performed the analyses? Yes X No___ N/A ___RMK#___

   e. Analytical technique(s) or method(s) used? Yes X No___ N/A ___RMK#___

   f. Results of such analyses? Yes X No___ N/A ___RMK#___

8. 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 A.12.(a)] Yes X No___ N/A ___RMK#___

9. Has Ohio EPA requested submittal of any reports or other information required by the conditions of the permit from the permittee? If so, Yes___No X N/A ___RMK#___

   a. Have the submittals been signed and certified according to OAC rules 3745-50-58(K) and 3745-50-42? [Condition A.13.] Yes___No___ N/A X RMK#___

WASTE MINIMIZATION REQUIREMENTS

10. Has the permittee submitted a Waste Minimization Report to Ohio EPA meeting the requirements of Condition A.29. of the permit within 180 days of permit journalization? Yes X No__ N/A ___RMK#___

    a. Following the first submittal as identified above in Question #10, has the permittee submitted biennial updates to this report as required by Condition A.29.(c)? Yes X No__ N/A ___RMK#___

REMARKS

-SITE SHIPMENTS/MANIFEST REQUIREMENTS

Is all hazardous and mixed waste transported from the facility by a properly registered transporter of hazardous and mixed waste in accordance with all applicable laws, rules and standards? [Condition A.16.] — Yes X No___ N/A ___RMK#___

MANIFEST REQUIREMENTS/WASTES RECEIVED ON-SITE

2. Upon receipt of the manifests, has the permittee signed and dated each copy of the manifest? [OAC 3745-54-71(A)(1); Condition B.24.] — Yes X No___ N/A ___RMK#___

3. For any significant discrepancies identified upon receipt of the manifest(s): did the permittee note such discrepancies on the manifest(s) in accordance with OAC rule 3745-54-71(A)(2) and Condition B.24? — Yes___No___ N/A X RMK#___

   a. Did the permittee attempt to reconcile the discrepancy? [Condition B.24.] — Yes___No___ N/A X RMK#___

   b. If the discrepancy was not resolved within 15 days: did the permittee submit a report, including a copy of the manifest, to the director in accordance with OAC rule 3745-54-72(B)? [Condition B.24.] — Yes___No___ N/A X RMK#___

4. Does the permittee immediately give the transporter at least one copy of the signed manifest? [OAC 3745-54-71(A)(3); Condition B.24.] — Yes X No___ N/A ___RMK#___

5. Does the permittee provide the generator with a copy of the manifest within 30 days of receipt of waste on-site? [OAC 3745-54-71(A)(4); Condition B.24.] — Yes X No___ N/A ___RMK#___

6. Does the permittee retain a copy of each manifest on-site for at least three years from the date of delivery? [OAC 3745-54-71(A)(5); Condition B.24.] — Yes X No___ N/A ___RMK#___

7. Has the permittee received any hazardous waste or mixed waste from off-site, other than as described in Condition B.2(b)? — Yes___No X N/A ___RMK#___

WASTE ANALYSIS/WASTE ANALYSIS PLAN

GENERAL REQUIREMENTS

1. Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information which is necessary to properly treat, store or dispose of the waste in accordance with OAC Chapters 3745-54 to 3745-57 and Condition B.3 of the permit (Section C of the approved permit application)? [OAC 3745-54-13(A)(1)] — Yes X No ___ N/A ___ RMK#___

2. Since the last inspection, were any wastes generated by the facility which were unable to be characterized through process knowledge? If so, — Yes ___ No X N/A ___ RMK#___

   a. Were the waste analysis procedures described in Section C of the approved permit application followed? — Yes ___ No ___ N/A X RMK#___

3. Is the permittee following the procedures described in the approved waste analysis plan (Section C of approved permit application) and the requirements of OAC rule 3745-54-13? [Condition B.3.] — Yes X No ___ N/A ___ RMK#___

4. Is the permittee maintaining waste analysis data in the facility's operating record as required by OAC rule 3745-54-73 and Condition B.22. of the permit? — Yes X No ___ N/A ___ RMK#___

WASTE ANALYSIS QUALITY ASSURANCE REQUIREMENTS

5. Is the permittee verifying the analysis of each waste stream annually as part of its quality assurance program in accordance with SW-846? [Condition B.3.] — Yes X No ___ N/A ___ RMK#___

6. In accordance with Condition B.3. of the permit, does the permittee's quality assurance plan ensure that the permittee is, at a minimum:

   a. Maintaining property functional instruments? — Yes X No ___ N/A ___ RMK#___

   b. Using approved sampling/analytical methods? — Yes X No ___ N/A ___ RMK#___

   c. Verifying the validity of sampling and analytical procedures and performance of correct calculations? — Yes X No ___ N/A ___ RMK#___

If the permittee uses a contract laboratory to perform analyses, did the permittee inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this permit?	Yes X No___ N/A ___RMK#___

REMARKS

GENERAL INSPECTION REQUIREMENTS

1. Is the permittee following the inspection procedures and schedules described in Section F of the approved permit application and the requirements of OAC rule 3745-54-15? [Condition B.5.] — Yes X No___ N/A ___RMK#___

2. Does the permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [OAC 3745-54-15(A)(1)(2)] — Yes X No___ N/A ___RMK#___

3. 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? — Yes X No___ N/A ___RMK#___

   a. Is the schedule kept at the facility? [OAC 3745-54-15(B)(2)] — Yes X No___ N/A ___RMK#___

   b. Does the schedule identify the types of problems which are to be looked for during the inspection? [OAC 3745-54-15(B)(3)] — Yes X No___ N/A ___RMK#___

   c. Does the schedule include inspection of areas subject to spills daily when in use and according to other applicable regulations when not in use? [OAC 3745-54-15(B)(4)] — Yes X No___ N/A ___RMK#___

4. 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 X No___ N/A ___RMK#___

5. Is the permittee maintaining records of inspections for a minimum of three years? [Condition B.5.] — Yes X No___ N/A ___RMK#___

6. 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 X No___ N/A ___RMK#___

   b. Signature of inspector? — Yes X No___ N/A ___RMK#___

c. Notation of observations made? Yes X No___ N/A ___RMK#___

d. Date/nature of any repairs or other remedial actions? Yes X No___ N/A ___RMK#___

SECURITY PROVISIONS/FACILITY OPERATION

1. Is the permittee complying with the security provisions of OAC rule 3745-54-14(B)(1) and B(2) and (C) and Section F of the approved permit application, including the following: [Condition B.4.]

   a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility; Yes X No___ N/A ___RMK#___

   b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility; or Yes X 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 X No___ N/A ___RMK#___

2. In accordance with OAC rule 3445-54-14(C), does the permittee have signs reading "Danger-Unauthorized Personnel Keep Out" posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? [Condition B.4.] Yes X No___ N/A ___RMK#___

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 waters? [Condition B.1.] Yes ✓ No___ N/A ___RMK#___

PERSONNEL TRAINING

1. Is the facility conducting personnel training in accordance with Section H of the approved permit application and the following requirements of OAC rule 3745-54-16: [Condition B.6.]

   a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC 3745-54-16(A)(B)(C)] — Yes X 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 3745-54-16(B)? — Yes X No___ N/A ___RMK#___

   c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(B)? — Yes X 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 X No___ N/A ___RMK#___

REQUIRED EQUIPMENT

1. Is the permittee, at a minimum, maintaining the equipment set forth in the approved permit application (Section G) at the facility? [Condition B.9.] — Yes X No___ N/A ___RMK#___

2. Is the permittee inspecting, testing, and maintaining the equipment specified in Question #1 to assure its proper operation as specified in OAC rule 3745-54-33, the inspection plans and Section G of the approved permit application? [Condition B.10.] — Yes X 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 Section G of the approved permit application? [Condition B.11.] — Yes X No___ N/A ___RMK#___

'TINGENCY PLAN REQUIREMENTS

...ERGENCY PROCEDURES

1. In compliance with Condition B.13.(a) of the permit, does the permittee:

   a. Familiarize the emergency response agencies likely to respond to an emergency at the facility with:

      i. The location and layout of the facility? Yes X No___ N/A ___RMK#___

      ii. Properties of hazardous waste and mixed waste managed at the facility and associated hazards? Yes X No___ N/A ___RMK#___

      iii. Places where facility personnel will normally be working? Yes X No___ N/A ___RMK#___

      iv. Entrances to and roads inside the facility? Yes X No___ N/A ___RMK#___

      v. Evacuation routes as depicted in Section G of the permit application? Yes X No___ N/A ___RMK#___

   b. Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the facility, and any further requirements imposed by the permit?; and Yes X No___ N/A ___RMK#___

   c. Familiarize local police and fire departments, local hospitals and other local emergency services with the properties of hazardous waste and mixed waste managed at the facility and the types of injuries which could result from fires, explosions or a release of hazardous wastes at the facility? Yes X No___ N/A ___RMK#___

2. Is the permittee in compliance with the requirements of OAC rule 3745-54-56 and Section G of the approved permit application regarding emergency procedures? [Condition B.20.] Yes X No___ N/A ___RMK#___

EMERGENCY AUTHORITIES

3. 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 X 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 X RMK#___

4. 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.] — Yes X No___ N/A ___RMK#___

5. Has the permittee notified the agencies in Question #4, in writing, within ten days of the effective date of any amendments or revisions to the Plan? [Condition B.18.(b)] — Yes X No___ N/A ___RMK#___

6. 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 in accordance with OAC rule 3745-54-53? [Condition B.18.(c)] — Yes X No___ N/A ___RMK#___

EMERGENCY COORDINATOR

7. Is the permittee in compliance with the requirements of OAC rule 3745-54-55 with regard to the emergency coordinator? [Condition B.19.] — Yes X No___ N/A ___RMK#___

AMENDMENT OF PLAN

8. Is the permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17.] — Yes X No___ N/A ___RMK#___

Note: *Also see Question #4 of RECORDKEEPING REQUIREMENTS to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.*

LEMENTATION OF PLAN

Has there been a fire, explosion or release of hazardous waste or mixed waste or constituents at the facility since the last date of inspection as described by Condition B.14. of the permit? If so, — Yes__No X 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? [Condition B.14.] — Yes__No__ N/A X RMK#___

b. Did the permittee collect and manage released material, emergency response material and by-products as hazardous waste or mixed waste until making a demonstration to Ohio EPA that such materials are not subject to Ohio hazardous waste rules? [Condition B.16.] — Yes__No__ N/A X RMK#___

c. 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 X RMK#___

   i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23.] ***Note:*** *See also Conditions A.21. and A.22. of the permit for additional reporting/recordkeeping requirements.* — Yes__No__ N/A X RMK#___

d. 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? [Condition B.23.] — Yes__No__ N/A X RMK#___

REMARKS

CONTINGENCY PLAN REQUIREMENTS

CLOSURE PLAN/AMENDMENT

1. Is the permittee maintaining at the facility, the approved closure plan which contains the elements set forth in OAC rule 3745-55-12? [Condition B.29.] — Yes ✓ No___ N/A ___ RMK#___

2. 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 3745-55-12(C)? [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.*

CLOSURE ACTIVITIES

3. Has the permittee closed the facility? If so, — Yes___ No ✓ N/A ___ RMK#___

   a. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26.] — Yes___ No___ N/A ✓ RMK#___

   b. Did the permittee carry-out the approved closure plan as set forth in the permit application and terms and conditions of the permit? [Condition B.26.] — Yes___ No___ N/A ✓ RMK#___

   c. After receiving the final volume of hazardous waste, did the permittee remove from the facility all hazardous waste and mixed 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#___

   d. 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#___

   e. Did the permittee notify Ohio EPA's Southeast District Office within five working days prior to all rinseate and soil sampling? [Condition B.32.(b)] — 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 X RMK#__

REMARKS

REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

1. Is the permittee following the procedures as specified in OAC rules 3745-54-17, 3745-55-77 and Section F of the approved application when managing ignitable, reactive and/or incompatible wastes? [Conditions B.7.(a) and C.10. and C.11.] Yes X No___ N/A ___RMK#___

2. Does the permittee ***not*** store incompatible waste ***except*** in accordance with OAC rules 3745-54-17(B) and 3745-55-77, and the terms and conditions of this permit? [Condition C.11.(a)] Yes X No___ N/A ___RMK#___

3. Does the permittee take precautions to prevent placing hazardous waste or mixed waste in an unwashed container that previously held an incompatible waste or material? [Condition C.11.(b)] Yes X No___ N/A ___RMK#___

4. Does the permittee ensure that all containers of incompatible wastes are physically separated from other incompatible wastes or materials by a wall, berm, dike, or other device in accordance with OAC rule 3745-55-77 and the Appendix to OAC rule 3745-55-99? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

   a. Are all containers of aqueous hazardous acids (ph $\leq$ 2) and caustics ph $\geq$ 12.5) sorted on different pallets and physically separated in different rooms? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

   b. Are aqueous acids and caustics in poly bottles, and other containers requiring nuclear criticality safety spacing physically separated in the same room by a dike? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

   c. Are containers of cyanides and sodium metals being stored in rooms physically separate from other incompatible wastes or other incompatible materials? [Condition C.11.(c)] Yes X No___ N/A ___RMK#___

5. Does the permittee provide electrical grounding for all containers, tanks and transport vehicles during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(b)] Yes X No___ N/A ___RMK#___

	Does the permittee provide and require the use of spark proof tools during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(c)]	Yes X No__ N/A ___RMK#__
7.	Does the permittee prohibit smoking and open flames in areas where hazardous wastes are managed and post appropriate signs? [Condition B.7.(d)]	Yes X No__ N/A ___RMK#__
8.	As required by OAC rule 3745-55-76, does the permittee store containers of ignitable or reactive wastes greater than 15 meters (50 feet) away from the Portsmouth Gaseous Diffusion Plant reservation boundary? [Condition C.10.(a)]	Yes X No__ N/A ___RMK#__

REMARKS

STORAGE OF HAZARDOUS WASTES IN CONTAINERS

NOTE: *The requirements of permit 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.*

1. Is the permittee storing in containers, only those wastes as specified in Section A of the Part B permit application? [Condition C.1.(a), C.2.] — Yes X No___ N/A ___RMK#___

2. Does the permittee limit the total quantity of containerized waste in the container storage area to 133,000 gallons at any given time in the permitted container areas, located in building X-326 and no more than 5,456,000 gallons at any given time in the permitted storage areas located in building X-7725? [Condition C.1.(a)] — Yes X No___ N/A ___RMK#___

NOTE: *For the purposes of compliance with the capacity limitation of the permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity. For example, a 55-gallon drum will be considered to be holding 55 gallons of waste, regardless of the actual quantity stored in the drum. [Condition C.1.(b)]*

3. When accumulating waste within the permitted X-7725 and X-326 container storage area, does the permittee ensure that the total amount of waste (both > 90 days and < 90 days) does not exceed the maximum container storage inventory established under Condition C.1.? [Condition C.1.(c)] — Yes X No___ N/A ___RMK#___ MAX Inventory

4. Are hazardous wastes subject to regulation by the permit stored only at the designated container storage area described in the approved permit application? (See Section D of the permit application) [Condition C.1.(a)] — Yes X No___ N/A ___RMK#___

5. Is each container stored clearly marked to identify its contents and the date each period of accumulation/storage begins? (See Section D of the permit application) [Condition C.3.] — Yes X No___ N/A ___RMK#___

6. Does the permittee store hazardous waste in the types of containers described in Section D of the approved permit application? [Condition C.1.(a)] — Yes X No___ N/A ___RMK#___

NDITION OF CONTAINERS

Are containers holding hazardous wastes in good condition? [Condition C.3.] Yes X No__ N/A ___RMK#___

a. If not, (e.g., severe rusting, structural defects) did the permittee transfer the hazardous waste from such a container to a container that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit and OAC rule 3745-55-71? [Condition C.3.] Yes__No__ N/A X RMK#___

9. 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 C.4.] Yes X No__ N/A ___RMK#___

10. Is storage conducted in the container storage containment system as described in Condition C.1. of the permit and Section D of the approved permit application? [Condition C.5.(a)] Yes X No__ N/A ___RMK#___

11. 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 C.5.(b)] Yes X No__ N/A ___RMK#___

12. Are lab-pack wastes handled in compliance with applicable storage requirements? [Condition C.5.(c)] Yes X No__ N/A ___RMK#___

13. Are lab-pack wastes packaged in drums containing absorbent material that is compatible with the wastes? [Condition C.5.(d)] Yes X No__ N/A ___RMK#___

INSPECTIONS

14. Is the permittee inspecting the container area weekly in accordance with OAC rules 3745-54-15, and 3745-54-73 and the approved inspection schedule (Section F) to detect leaking containers and deterioration of containers and the containment system? [Condition C.8.] Yes X No__ N/A ___RMK#___

a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken? [Condition C.8.] Yes X No__ N/A ___RMK#___

b. On days when containerized waste are added or removed to and/or from any of the permitted areas for storage, does the permittee conduct inspections as described in Section F of the approved Part B permit application and maintain the inspection results in the facility operating record? [Condition C.8.] Yes ✓ No___ N/A ___RMK#___

CONTAINMENT SYSTEM

15. Does the permittee maintain the containment system as described in Section D of the approved Part B permit application, including: [Condition C.6.] Yes ✓ No___ N/A ___RMK#___

a. Sufficient design to contain 10% of the total volume of the containers or the volume of the largest container, whichever is greater? [Condition C.6.(b)] 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#___

c. Equipped with a coating which is compatible with each waste stored in the area? Yes ✓ No___ N/A ___RMK#___

d. *For those wastes which are deemed incompatible with liner material:* Has the permittee installed a separate secondary containment structure within the existing structure which is equipped with a compatible liner? Yes___No___ N/A ✓ RMK#___

16. Has the permittee had a spill or leak of wastes or an accumulation of precipitation in the containment system? If so, Yes___No ✓ N/A ___RMK#___

a. Are spilled or leaked wastes and accumulated precipitation removed from the sump or collection area in a timely manner? [Condition C.6.(c)] Yes___No___ N/A ✓ RMK#___

b. Does removal of spilled/leaked wastes and accumulated precipitation occur within 24 hours from the time the spill or leak waste is discovered? [Condition C.6.(c)] Yes___No___ N/A ✓ RMK#___

QUIRED AISLE SPACE

Is the permittee maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in the event of an emergency to any area of the facility as required by OAC rule 3745-54-35? [Condition B.12.]

Yes X No___ N/A ___RMK#___

CLOSURE AND POST-CLOSURE

18. At closure of the container storage area, did the permittee remove all hazardous waste, hazardous waste residues, mixed waste and mixed waste residues from the containment system, in accordance with the procedures set forth in the approved closure plan (Section I of the permit application)? [Condition C.13.(a)]

Yes___No___ N/A X RMK#___

19. During closure, if the permittee could not demonstrate that all contaminated soils could be removed, did the permittee close the unit and perform post-closure care following a plan approved by Ohio EPA? [Condition C.13.(b)]

Yes___No___ N/A X RMK#___

CONTAINER STORAGE OF RESIDUAL WASTE

20. Is the permittee complying with the provisions of Section C-2E of the application as amended pursuant to Condition B.2.(b) of this permit?

Yes X No___ N/A ___RMK#___

LAND DISPOSAL RESTRICTION REQUIREMENTS

PROHIBITION AGAINST DILUTION

1. Has the permittee updated the annual Federal Facility Compliance Act Schedule? [OAC rule 3745-270-50; Condition B.36.] — Yes X No__ N/A __ RMK#__

2. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [OAC rule 3745-270-40 through 49; Condition B.36.(c)] — Yes__ No X N/A __ RMK#__

   a. As a substitute for adequate treatment to achieve compliance with LDR treatment standards? — Yes__ No__ N/A X RMK#__

   b. To circumvent the effective date of a prohibition (e.g., to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)? — Yes__ No__ N/A X RMK#__

   c. To otherwise avoid a prohibition in OAC rule 3745-270-30 through -39? — Yes__ No__ N/A X RMK#__

   d. To otherwise avoid a prohibition imposed by Section 3004(d) of RCRA? — Yes__ No__ N/A X RMK#__

NOTE: *If the answer to any of Questions 2(a) through 2(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of OAC rule 3745-270-03 [Condition B.36.]. Dilution of wastes is permissible under some conditions. See OAC rule 3745-270-03(B).*

GENERATOR REQUIREMENTS

3. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No__ N/A __ RMK#__

   a. ***For determinations based solely on knowledge of the waste***: Is supporting data used to make this determination being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No__ N/A __ RMK#__

   b. ***For determinations based upon analytical testing***: Is a copy of waste analysis data being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] — Yes X No__ N/A __ RMK#__

Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g., wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [OAC rule 3745-270-07; Condition B.36.(e)] Yes X No__ N/A ___RMK#___

5. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [OAC rule 3745-270-07(A); Condition B.36.(e)] Yes X No__ N/A ___RMK#___

6. Does the entity generate any listed waste(s) which are restricted from land disposal? If so, Yes X No__ N/A ___RMK#___

   a. Do such wastes also exhibit hazardous waste characteristics as identified in OAC rules 3745-51-20 to 3745-51-24? Yes X No__ N/A ___RMK#___

   b. ***For listed wastes which also exhibit a characteristic***: Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [OAC rule 3745-270-09(A)] Yes X No__ N/A ___RMK#___

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC rule 3745-270-09(B)].*

NOTIFICATION/CERTIFICATION

7. ***For wastes that do not meet treatment standards:*** Has the generator submitted a one-time written notice to the treatment/storage facility receiving the wastes, that wastes being received do not meet treatment standards? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No__ N/A ___RMK#___

   If so, does the notice including the following:

   a. EPA hazardous waste number? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No__ N/A ___RMK#___

   b. Appropriate treatment standard for the waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No__ N/A ___RMK#___

c. The manifest number associated with the first shipment of waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No__ N/A __ RMK#__

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No__ N/A __ RMK#__

e. Applicable wastewater/non-wastewater category [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] — Yes X No__ N/A __ RMK#__

f. For hazardous debris, list the contaminants subject to treatment, as described in paragraph (B) of OAC rule 3745-270-45; and an indication that these contaminants are being treated to comply with OAC rule 3745-270-45. — Yes X No__ N/A __ RMK#__

g. For contaminated soil list the constituents subject to treatment as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. — Yes X No__ N/A __ RMK#__

8. ***For wastes that meet treatment standards:*** Does the generator submit a one-time written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__ No__ N/A X RMK#__

If so, does the notice/certification including the following:

a. EPA hazardous waste identification number? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__ No__ N/A X RMK#__

b. The corresponding treatment standards and applicable prohibitions for the waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__ No__ N/A X RMK#__

c. The manifest number associated with the shipment of waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] — Yes__ No__ N/A X RMK#__

d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes__No__ N/A X RMK#__

e. Is the certification signed by the generator or an authorized representative? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes__No__ N/A X RMK#__

f. For contaminated soil list the constituents subject to treatment as described as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. Yes__No__ N/A X RMK#__

9. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years? [OAC rule 3745-270-07(A)(8); Condition B.36.(j)] Yes X No__ N/A ___RMK#__

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

NOTE: *The following questions apply to operators of treatment, storage or disposal (TSD) facilities that accumulate LDR wastes that do not meet treatment standards in tanks or containers. A LQG who stores LDR wastes on-site for greater than 90 days becomes a operator of a storage facility and must comply with all applicable TSD requirements. SQGs become owners/operators of storage facilities if storage of LDR wastes exceeds 6,000 kg. or 180/270 days.*

NOTE: *The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [OAC rule 3745-270-50(E); 40 CFR 268.50(e)]*

10. Is the owner/operator storing LDR restricted wastes in containers? If so, is each container marked with the following information in accordance with OAC rule 3745-270-50(A)(2)(a) [Condition B.36(l)] Yes X No__ N/A ___RMK#__

a. The identification of the contents? Yes X No__ N/A ___RMK#__

b. The date which accumulation began? Yes X No__ N/A ___RMK#__

NOTE: *A TSD facility may store LDR wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [OAC rule 3745-270-50(B)]. During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.*

11. Are LDR wastes being stored at the facility for greater than one year? If so,

    a. Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [OAC rule 3745-270-50(B); Condition B.36(m)]

    Yes X No___ N/A ___RMK#___

C:\Documents and Settings\Walt S. Francis\Local Settings\Temp\~8187920.wpd

R REQUIREMENTS

.. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] **If so**: Yes X No ☐ N/A ___RMK#___

a. **For determinations based solely on knowledge of the waste:** Is supporting data retained on-site? [3745-270-07(A)(6)] Yes X No ☐ N/A ___RMK#___

b. **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes X No ☐ N/A ___RMK#___

2. Has the generator determined each Ohio EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2), see Table 1] Yes ___No ☐ N/A ___RMK#___

3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes X No ☐ N/A ___RMK#___

4. Does the generator generate a characteristic hazardous waste? **If so:** Yes X No___ N/A ___ RMK#___

a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes X No ☐ N/A ___RMK#___

NOTE: *If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.*

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] **If so:** Yes X No___ N/A ___ RMK#___

a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes X No ☐ N/A ___RMK#___

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]*

6. Has the generator **correctly** determined if restricted wastes meet or exceed treatment standards? [3745-270-07(A)(1)] Yes X No ☐ N/A ___RMK#___

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03]

Yes X No ☐ N/A ___RMK#___

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

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)]

Yes ☐ No___ N/A X RMK#___

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)]

Yes ☐ No___ N/A X RMK#___

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste?[3745-270-05] **If so:**

Yes___ No X N/A ___ RMK#___

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

11. Does the facility have an extension to allow for a restricted waste to be land disposed?[3745-270-06] **If so:**

Yes ___ No X N/A ___RMK#___

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

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? **If so:**

Yes ___ No X N/A ___RMK#___

a. Has the facility complied with 3745-270-04?

Yes ___ No ☐ N/A X RMK#___

REMARKS

TE: *If the waste will be treated and monitored for **all** UHCs then they do not need to be listed on the notice.*

8. Has the process/operation generating the waste or the solid waste landfill facility changed? If so: Yes___ No___ N/A X RMK#___

   a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)] Yes ___ No ☐ N/A X RMK#___

   b. Has the director been notified of such changes? [3745-270-09(D)] Yes ___ No ☐ N/A X RMK#___

NOTE: *The director need only be notified on an annual basis but no later than December 31.*

9. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: Yes___ No___ N/A X RMK#___

   a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49(C)] Yes ___ No ☐ N/A X RMK#___

10. Does each notification/certification form completed, contain the information found in Table1? [3745-270-07(A)(3)] Yes ___ No ☐ N/A X RMK#___

NOTE: *If the waste will be treated and monitored for all constituents, there is no need to put them all on the LDR notice.*

REMARKS

HAZARDOUS DEBRIS

1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)? Yes___ No___ N/A X RMK#___

2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.) Yes___ No___ N/A X RMK#___

3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so: Yes___ No___ N/A X RMK#___

   a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)] Yes ___ No ☐ N/A X RMK#___

NOTE: *If immobilization has been used in a treatment train, it must be the last treatment technology used.*

4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so: Yes___ No___ N/A X RMK#___

   a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)] Yes ___ No ☐ N/A X RMK#___

5. Is the waste a PCB waste under 40 CFR Part 761? If so: Yes___ No___ N/A X RMK#___

   a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 270? [3745-270-45(A)(5)] Yes ___ No ☐ N/A X RMK#___

6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)] Yes ___ No ☐ N/A X RMK#___

7. Does the owner/operator of a treatment facility that claims the debris is excluded under 3745-51-03(F)(1) maintain the following information?

a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)] Yes___ No___ N/A X RMK#___

b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)] Yes ___ No ☐ N/A X RMK#___

c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)] Yes ___ No ☐ N/A X RMK#___

8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F) have the following information? [3745-270-07(D)(3)] Yes ___ No ☐ N/A X RMK#___

a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)] Yes___ No___ N/A X RMK#___

b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)] Yes ___ No ☐ N/A X RMK#___

c. Technology used from Table 1? [3745-270-07(D)(1)(c)] Yes ___ No ☐ N/A X RMK#___

9. Has the above notification been sent to the director? [3745-270-07(D)(1)] Yes ___ No ☐ N/A X RMK#___

REMARKS

TREATING FACILITIES

1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-14?[3745-270-07(B)] — Yes X No ☐ N/A ___RMK#___

2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)] — Yes X No ☐ N/A ___RMK#___

Note: *No further notification is necessary until such time that the waste changes or the receiving facility changes.*

3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07?[3745-270-07(B)(3)] — Yes X No ☐ N/A ___RMK#___

4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so**: — Yes___ No___ N/A X RMK#___

   a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)] — Yes ___ No ☐ N/A X RMK#___

5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-58-30? **If so:** — Yes___ No___ N/A X RMK#___

   a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)], excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)] — Yes ___ No ☐ N/A X RMK#___

   b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4)[3745-270-07(B)(6)] — Yes ___ No ☐ N/A X RMK#___

   c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B))(6)] — Yes ___ No ☐ N/A X RMK#___

6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)] — Yes ___ No ☐ N/A X RMK#___

7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have: — Yes X No___ N/A ___RMK#___

a. Copies of all notices and certifications required in 3745-270?

Yes X
_ No
❑
N/A _

_
RMK
#___

b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49?

Yes X
_ No
❑
N/A _

_
RMK
#___

c. Followed the testing frequency specified in the facilities WAP?

Yes X
_ No
❑
N/A _

_
RMK
#___

B:\USDOEPortsmouthChecklists\ldr.wpd

REMARKS

INSPECTION REPORT

GENERAL INFORMATION:

U.S. Department of Energy
Portsmouth Gaseous Diffusion Plant
3930 U.S. Route 23 South
PO Box 700
Piketon, Ohio 45661-0700

OH7 890 008 983

Date of Inspection - June 10 & 11th, 2003

U.S. EPA RCRA Inspector - Walt Francis
OEPA RCRA Inspector - Melody Stewart

U.S. DOE - Melda Rafferty and Matthew Vick

Bechtel Jacobs - Cliff Beeks
Mary Williams

Ownership - Federal Government

Type of inspection - CEI-LQG and Container Storage

SAA's and RCRA Container Storage areas were inspected.

Active Satellite Accumulation Areas

X-622	South wall of process area
X-622T	Inside west wall
X-624	Inside front door
X-625	X-120 Groundwater Pilot Project
X-326	Center of north wall in X-326
X-330	X-330 Process Building, Column L71
X-333	X-333 Process Building, Column U48
X-3012	Maintenance area on south side
X-747H	X-752

Active 90 Day Accumulation Areas

X-623	Groundwater treatment building
X-7725	East side, X-7725, Area D
X-7725	GW Program, X-7725 South side
X-744G	X-744G Access Point to Section 6 Floor (Closed)

Permitted Container Storage

X-326 L Cage
X-7725 First floor areas - A, B, C, D, E, F, G, H, I, J, K, L, M, and M1.
Fourth floor areas - 4A, 4B, 4C, and 4E.

As part of the inspection we visited/toured:
Tuesday 6/10/2003:

1) X-744G - Uranium containing material from Fernald, Cornell University. T-Hoppers of Uranium Trioxide. Closed 90 day area. Also, inspectors looked at bulldozer outside of building, OEPA inspector inquired if the lead acid battery had been removed or not;

2) X-623 - One 55-gallon SAA Waste TCE. 90 day area contained one 55-gallon container of F001 dated 4/11/03 and box of spent carbon;

3) X-700 - 5,00 gallon tanker truck, sump water from basement of X-700 pumped to tanker truck. Tanker truck was identified as a 90-day area, accumulation date of 6/9/03. RFD # = EC-609;

2) X-622T - One 55-gallon SAA container of F001 plastic and PPE.

3) X-625 - One 55-gallon SAA container X-120 GW project. F001 PPE, glass and plastic.

4) X-622 - F001 PPE & Bag Filters.

5) X-624 - X-611A - Lime Sludge Lagoons, SAA 1 55-gallon container F001 PPE & Filters & Plastic F001 GW recovery.

6) X-752 Warehouse, X-747H - SAA Used aerosol cans;

7) X-752 Excess Vehicle storage area;

7) X-333 - One 55-gallon SAA container of PCB troughing oil containing heavy metals;

8) X-330 - SAA area 13 Polybottles each containing 2½ gallons of waste = 32.5 gallons of PCB troughing;

9) X-326 SAA 8-Polytubes of PCB trough, Note: Four used lamps

and fluorescent lamp ballasts placed outside of SAA area;

13) X-326 L Cage - 4/18/94 Container of Barrier Cleanup Ni RFD # 22450-2;
3/20/96 Container from X-705A #F010936, RFD# 36570-06;
1/1/90 Container RFD#52003-10, #GPO13017;

10) X-3012 - Paint Storage SAA five 5-gallon containers of used aerosol cans, and three 5-gallon containers of used rags. Also, two blue 55-gallon containers of roofing material outside since last inspection. Also, three rusty 30-gallon containers of all purpose lubricant called AlmaGuard. Used batteries are sent to X-3012;

11) X-7725 Storage Building - Met with Mitch Newman, 90 day inspection logs, OK.

RFD# 19234-3 D040 7/26/93;
RFD# 18477-1 F006 Filter Cake Sludge 6/3/93;

Area C - OK;

Area C-1 - OK;

Area P-3 - OK;

Area P - OK;

Area O - Caustics, Container of sulfuric acid drained from batteries, RFD # 31684-2 dated 4/3/95 D002 waste code;

Area Q - USEC waste in storage;

Area K - OK;

Area L - No waste in storage;

Area H - Area outside of S11 door open!
RFD # 20237-1 11/8/89, D001-D008, D009.

Area B - OK;

Area 4A - RFD # 39725-1, Polybottle container # 581780 dated 5/30/96;

Area 4 E - OK;

Area 4B - RFD #4781-1 dated 8/17/90 F007 lab waste;

Area 4C - OK;

Area M-1 - Contaminated Alumina;

Area M - Waste aerosol cans.

Records Review

1) Inspection Logs - performed by Maria Kragler and John Yeagle, OK;

2)Operating Record - OK, RFD database;

3) Hazardous Waste Annual Report - OK, Sent to OEPA 2/27/03;

4) Training Records - Lew Goidell, Emergency Coordinator as of 10/21/02, training OK, Cliff Beeks training OK;

5) Manifests - Last shipment dated 1/16/03, of F001 TCE soil to Oak Ridge, TN RTM and EC for disposal;

6) Contingency plan - OK a copy was sent to OEPA on 10/23/02;

7) Waste analysis check (RFD#s)-
25656-1
10748-1
36593-4
32820-6
4718-2
16876-1
22450-2
36570-06
52003-10
19234-3
18477-1
31684-2
20237-1
39725-1
4781-1

Closeout Meeting

1) Letter to Russell Vranicar not Sharon Robinson and Gilbert Drexel.

2) 55-gallon containers of roofing material are still outside X-3012 near the Paint Shop, and 3 containers of lube outside of X-3012 Wood Shop.

3) During the inspection of Building X-7725, in H Area, the inspectors observed an open outside door (Door # S-11).

4) RFD's waste analysis - OK.

5) X-700 Tanker Truck issue - OK, USEC will add tanker truck to 90 day inspection list.

6) Last shipment of lead acid batteries, 1/22/02, last shipment of used fl. Lamps, 7/02.

7) Lead acid batteries were being stored in excess vehicles.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 26 2002

REPLY TO THE ATTENTION OF DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Sharon Robinson
Director
U.S. Department of Energy
Portsmouth Site Office
P.O. Box 700
Piketon, Ohio 45661-0700

Mr. Gilbert Drexel
Bechtel Jacobs Company LLC
P.O. Box 700
Piketon, Ohio 45661-0700

Re: Letter of Acknowledgment
RCRA Compliance Evaluation Inspection
U.S. Department of Energy
Portsmouth Gaseous Diffusion Plant
Piketon, Ohio
OH7 890 008 983

Dear Ms. Robinson and Mr. Drexel:

On July 8 and 9, 2002, your installation located near Piketon, Ohio, was inspected by United States Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) representatives. The purpose of the inspection was to evaluate compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, transportation, and storage of hazardous waste.

U.S. EPA did receive a copy of the July 16, 2002, letter sent to you from the OEPA, regarding the July 8th and 9th inspection. We also received a copy of your July 15th, 2002, fax to OEPA and U.S. EPA regarding the July 15, 2002, shipment of used fluorescent light bulbs off-site for recycling.

In addition, during the above referenced July 2002 inspection, the inspectors observed that there has been a significant amount of work completed to remove many of the rusty 55-gallon containers outside of Building X-7725, that were noted in U.S. EPA's September 14, 2001, letter.

Recycled/Recyclable . Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

As of this writing, our review of the inspection has not resulted in the detection of violations of any of the 40 CFR Part 264 Subpart CC (Air Emission Standards for Containers) RCRA requirements. U.S. EPA has enclosed a copy of the Subpart CC checklist.

This determination does not limit the applicability of either the requirements examined or other RCRA regulations. Your installation will continue to be evaluated by U.S. EPA and the OEPA in the future.

If you have any questions regarding this letter, please contact Walt Francis of my staff at (312)353-4921.

Sincerely yours,

for Michael Beedle, Acting Chief
Compliance Section #2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosure

cc: Melody Stewart, OEPA-Southeast District Office

Inspection Checklist for Subpart CC: Air Emission Standards (Containers)

Item # 40 CFR:

CC-1	265. 1080	**Do any of the following exclusions apply? If yes, please circle.**	YES	NO

Applicability: The air emission requirements apply to units subject to subpart I * unless the following apply (circle if applicable):

1. Waste was placed in unit prior to Oct. 6, 1996, and none has been added since.
2. The container capacity is less than .1 cubic meter (26 gallons)
3. A unit (e.g. tank) has stopped adding waste and is undergoing closure
4. The unit is used solely for onsite treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program
5. The unit is used solely to manage radioactive mixed waste
6. The unit is regulated by and operates in accordance with Clean Air Act regulations

***Note: 1. Satellite containers are exempt 2. CESQG's and SQG's are exempt**

CC-2	265.1083	**Do any of the following exemptions apply? If yes, please circle**	YES	NO

General Standards: The owner/operator must control air emissions from waste management units except the unit is exempt if (please circle if applicable):

1. All hazardous waste entering the unit has an average VO concentration at the point of origination less than 500 parts per million by weight (waste determination required)
2. The organic content of all waste entering the unit has been reduced by one of the 8 acceptable destruction or removal processes.
3. The unit is a tank used for certain biological treatment
4. The hazardous waste placed in the unit meets the LDR numerical concentration limits or has been treated using the specified LDR treatment technology (for organics)
5. The unit is a tank used for bulk feed to an incinerator and meets certain requirements

CC-3	265.1084	**Waste Determination:**	Determination Not Needed X	

Was the VO concentration properly determined for each waste which the facility manages in a unit which does not meet Subpart CC requirements? The concentration must be determined by either direct measurement or knowledge. Please see 265.1084 for specific requirements for measurement and knowledge. Determination is not needed for waste managed in containers which meet standards. It may be necessary to evaluate container management prior to requiring VO concentration determination.

#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency	NA	NI	OK

CONTAINER MANAGEMENT 265.1087

	Level 1	Level 2	Level 3
	Larger than 26.4 gallons and less than or equal to 122 gallons, or larger than 122 gallons and do not manage H.W. in light material service	Larger than 122 gallons and manage H.W. "in light material service" (definition at 265.1081)	Larger than 26.4 gallons and treat H.W. by a stabilization process
CC-4	265.1087 **Controls**		OK
	One of the following: -Use containers that meet DOT requirements -Use a cover and control with no visible gaps, holes or other open spaces into the interior of the container -Use organic vapor suppression on or above the container 265.1087(c)	One of the following: -Use containers that meet DOT requirements -Use containers that operate with no detectable emissions (method 21) -Use containers that are demonstrated to be vapor-tight within the last 12 months (method 27) 265.1087(d)	-Containers used to stabilize H.W. with volatile organics greater than 500 ppm -For waste stabilized in a container either: 1.container must be vented directly to a control device; or 2.container is vented inside an enclosure which is exhausted through a closed vent to a control device -Conservation vents are not allowed 265.1087(b)(2)

Level 1		Level 2	Level 3		
#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency		NA	NI	OK
CC -5	265.1087	**Waste transfer requirements**			OK
No waste transfer requirements apply		-Waste transfer requirements apply regardless of container alternative used in level 2 -Transfer waste into or out of a container in such a manner as to minimize exposure of the waste to the atmosphere. Acceptable methods include a submerged fill pipe, vapor recovery system, or fitted opening with a line purge 265.1087(b)(3)	Not applicable		
CC-6	265.1087	**Operating requirements**			OK
The covers, openings, and closure devices should be closed except: 1. When transferring H.W. in and out of the containers 2. between batch transfer not exceeding 15 minutes between transfer (note: if the person performing the transfer leaves the area, or the process shuts down, the container must be closed) 3. While performing sampling and equipment access 4. Conservation and safety vents are allowed -Containers may be open while performing sampling or equipment access -Safety valves and conservation vents may be used if normally left in close position -A cover need not to be on a RCRA empty container, as defined in 40 CFR 261.7 265.1087(c)(3), (d)(3)			-If the vapors are directly vented to a control device, there are specific design and operating criteria that must be met same as tanks that have closed vent and control device systems -If an enclosure is used, the enclosure must meet the design and operating criteria specified in "Procedure T-Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR 52.741 The container, enclosure, control device or closed vent system may have safety relief devices.		
CC-7	265.1089	**Inspection requirements**			OK
Minimal inspection required: - when facility accepts container and it is not emptied within 24 hours -if wastes are stored greater than a year, then visually inspect once a year If inspections are required, facility must develop written plan and schedule to perform inspection 265.1087(c)(4), (d)(4)			Inspection requirements are the same as for tanks		
CC- 8	265.1087	**Repair requirements**			OK
When a defect is detected; attempt to repair within 24 hours must be made and: 1. Repair within 5 calendar days or empty and remove the container from service 2. Do not use until defect is repaired 265.1087(c)(4), (d)(4)			Necessary corrective measures shall be immediately implemented to ensure that the control device is operated in compliance		
CC- 9	265.1090	**Recordkeeping requirements**			OK
-If container exceeds 122 gallons and does not meet DOT standards, records indicating that the container is not managing H.W. in light material service		Since Level 2 waste is "in light material service", no records need to be kept	Depends upon how the organic emissions are vented: -If an enclosure is used, records must be maintained for the most recent set of calculations and measurements performed to verify that the enclosure meets the criteria of a permanent total enclosure (Procedure T) -Records for the closed vent and control device system are the same for those used on tanks(265.1090)(e)		

Comments:

INSPECTION REPORT

GENERAL INFORMATION:

U.S. Department of Energy
Portsmouth Gaseous Diffusion Plant
3930 U.S. Route 23 South
PO Box 700
Piketon, Ohio 45661-0700

OH7 890 008 983

Date of Inspection - July 8th and 9th, 2002

U.S. EPA RCRA Inspector - Walt Francis
OEPA RCRA Inspector - Melody Stewart

U.S. DOE - Melda Rafferty

Bechtel Jacobs - Rosemary Richmond (740) 897-2967
Jackie Adams
Rodger Mill - Wasteren
John Purvis - Wasteren
Mitch Newman
Matt Vick - DOE
Chris Guilliams
Mary Williams
Lew Goidell - Bechtel Jacobs

Ownership - Federal Government

Type of inspection - CEI-LQG and Container Storage

SAA's and RCRA Container Storage areas were inspected.

Active Satellite Accumulation Areas

X-622	South wall of process area
X-622T	Inside west wall
X-624	Inside front door
X-625	X-120 Groundwater Pilot Project
X-7725	South side near overhead door S-20
X-326	Center of north wall in X-326
X-330	X-330 Process Building, Column L71
X-333	X-333 Process Building, Column U48
X-3012	Maintenance area on south side
X-747H	X-752

Active 90 Day Accumulation Areas

X-623 Groundwater treatment building
X-7725 East side, X-7725, Area D
X-7725 GW Program, X-7725 South side
X-744G X-744G Access Point to Section 6 Floor

Active Registered Temporary Hazardous Waste Storage Areas
X-749 Slurry storage tanks

Permitted Container Storage

X-326 L Cage
X-7725 First floor areas - A, B, C, D, E, F, G, H, I, J, K, L, M, and M1.
Fourth floor areas - 4A, 4B, 4C, and 4E.

As part of the inspection we visited/toured:
Monday 7/8/2002:

1) X-623 - Two 90 day 55-gallon containers of F001 dated 5/9/02, and 6/6/02.
90 day Box of spent carbon dated 6/6/02, F001 waste.
55-gallon SAA Waste TCE.

2) X-622T - 55 gallon container of F001 plastic and PPE.

3) X-625 - X-120 GW project. F001 PPE, glass and plastic.

4) X-622 - F001 PPE & Bag Filters.

5) X-624 - X-611A - Lime Sludge Lagoons, PPE & Filters & Plastic F001 GW recovery SAA.

6) X-749 - Slurry Tanks. F001 waste dated 2/5/02, 8 22,000 gallon tanks, used for phytoremediation project containing 8 ppb TCE.

7) X-333 - PCB Drop Oil containing heavy metals.

8) X-330 - 10 Polybottles each containing 2 ½ gallons of waste.

9) X-744G - Uranium containing material from Fernald, Cornell University. No waste in 90 day area.

10) X-3012 - 5 gallon containers of aerosol cans, dirty gloves, and rags. Also, cabinet utilized for air drying oil based paint outside in parking lot. Also, 2 blue 55 gallon

containers of roofing material stored outside and rusting.

11) X-747H - Plugged and empty aerosol cans.

Tuesday July 9th

12) X-326 SAA 6-Polybottles.

13) X-326 L Cage - D009 Metal Gunk 9/2/87 #11592-1
#52203-1 6/16/99 Waste code on tag.

14) X-7725 - Loading Dock Fl. Light Bulb Storage Trailer - Met with Mitch Newman, Bulbs at front of trailer dated 3/01.

15) X-7725 Storage Areas -

A Area - #33912-8 Coal tar Rags, Fiberglass, in metal box labeled non-haz. Also box of chimney block dated 11/15/95, #34239-1 with waste codes D005, D006.

H Area - D009 Gunk

L Area - #34232-5 Non-Regulated Drums for sampling.

H Area - 5 gallon paint can 5/10/93 D001, D008 #8123-4.

K Area - OK

J Area - #49829-30 1/27/99 Sludge 55 gallon container D009 No name, address, no ID # on HW label, but did have USEC label. #19903-1 10/15/93 D006 No Name, Address, ID #. Also, 5 gallon container of broken fl. Bulbs dated 2/01/97.

G Area - #30770-1 Chlordane U036 8/26/85

Q Area - #11377-1 Rad waste Lead acid Battery D008, D002 9/3/92 radioactive sticker.

P Area - #19975-6

P-1 Area - Non-Reg water from dumper unit.

P-2 Area - Locked - No waste in storage.

P-3 Area - Ok

C-1 Area - Ok

4-D Area - Barbituric Cyanice

4-C Area - USEC Waste.

4-E Area - Sodium Fluoride, D004 Alumina, F001 Solvent Rags 6/19/01, #6035-5.

4-B Area - Potassium Permangante 3 - 5 gallon drums #54365-3.

C - Area - Boxes Heavy Metal Sludge #39305-8 Non-RCRA Rad waste.

B-Area - Ok

Records Review

1) Manifests -
#1 - 4/5/02 F001 18,249 K
#2 - 3/28/02 18,257 K 80 CM F001
Sending to TNR 000 005 397 ETM & EC, Oak Ridge, TN
#3 - 3/28/02 76 drums 18,125 pounds, F001
#4 - 4/4/02 43 drums 11,358 pounds F001
#5 - 4/11/02 67 CM 16,295 pounds to ETM
#6 -
#7 - F001 ETM 4/18/02 17,737 pounds 72 containers
#8 - F001 70 drums 4/25/02
#9 - F001 to ETM 18,103 pounds 5/1/02
#1 - F001, F002, F003 DOE-ETTP TN0 890 090 004.
#10 - ETM F001 5/02/02, 66 containers
#11 - ETM 5/8/02, 76 containers
#2 - Ship to DOE Oak Ridge 6047 K F001, F002, F003, F005, D018, D035, D039, 5/28/02, No TSD copy in file folder. Note: Later was found. OK
#12 - F001 5/15/02 to ETM F001, D006, D00? 18,000 K
#14 -F001, F003, D018 5/30/02 to ETM 15,780 pounds + 2113 + 00038. No TSD copy. Note: Later found OK
#13 - F001, D006, D007, D008, D009, D010, D011 to ETM.

Note: 9/28/01 shipment to Envirocare Utah of F001 waste 16 bm had Oak Ridge DOE as gen but used Ports ID number.

2) Weekly inspection records/log - Bldg #7725 -
Area G - Leaks fixed;
Area F OK, no problems;
Area H - OK;
Area J - OK;
Area K- OK;
Area L - OK;

Area M - OK;
Area M1 - OK;
Area N - OK;
Area 4E - OK.

Contingency plan - OK (Must update for change of address for Lou)

Training - OK

Waste analysis check (RFD#)-
#11592-1 D009 Metal Gunk
#52203-1 No waste code 6/16/99;
#33912-8 Coaltar rags, Fiberglass, metal box Non-Haz;
#34239-1 D005, D006 11/15/95;
#34232-5 Non-Regulated;
#8123-4 5 gal paint cans 5/10/93 D001, D008
#49829-30 1/27/99 Sludge 55 gal container 1/27/99;
#19903-1 10/15/93 D006;
#30770-1 Chlordane 8/26/85 U036;
#11377-1 Lead Acid Battery 9/3/92 D008, D002, Radioactive;
#19975-6
#6035-5 6/19/91 F001, solvent rags;
#54365-3 3-5gal drums Potassium Permanganate;
#39305-8 Heavy metal sludge, non-RCRA Rad;

Fluorescent Light Bulbs - Sent to Superior Special Services, Fond du Lac, Wisconsin. Last shipment 6/20/00. 2,050 pounds. Labeling OK. **Storage beyond 1 year, will be addressed in OEPA letter.**

Closeout Meeting

1) Name/address on manifest DOE Ports not Oak Ridge!

2) Paint cans drying outside;

3) Drums outside of X-7725, Getting cleaned up, GOOD! 7,000 drums done by Sept.

4) Heavy metal sludge - Non haz now. Previous analysis indicates haz for heavy metals.

5) Box #2294-1 Need photo e-mail D002. Multiple waste codes?

6) Wash water solid waste non-rad stored since 1993;

7) 3 5-gallon containers of Potassium Permanganate #54365 from X-7726 about 4 years ago non-rad.

8) Area P - Brown gunk on walls;

9) X-3012 RCRA Empty to dry, cabinet painters, gray shelving unit for paint drying.

10) Aerosol cans - inconsistent approach, scrap metal; 3012, landfill

11) X-622 and X-623 PPE characterized as F001;

12) Fl. Lights 75% not shipped off in a calendar year.

Observed Violations/Areas of Concern (From Checklist)

1) Fl. Light Bulb Trailer - Storage greater than 1 year.

Other Issues:

- Disposal of aerosol cans inconsistent plant wide.

- Rusty Drums ouside of building X-7725 getting cleaned up.

- Fl. Light Bulbs - OEPA more stringent than EPA Lamp Rule.

- G Area - #30770-1 Chlordane U036 8/26/85

- 9/28/01 F001 16 BM shipment to Envirocare Utah with Oak Ridge as Generator?

- Must update contingency plan for Lou change of address?

- 3 5-gallon containers of Potassium Permanganate #54365 from X-7726 about 4 years ago non-rad.

STATE PART B HAZARDOUS WASTE PERMIT INSPECTION CHECKLIST

DIVISION OF HAZARDOUS WASTE MANAGEMENT
OHIO EPA
July 2002

Table of Contents
Portsmouth Gaseous Diffusion Plant
04-66-0680

RCRA Inspection Checklist 1

General Conditions of Permit 2
- General Permit Compliance and Activities 2

Permit Modification, Revision, Revocation 5

Site Entry - Availability of Records 7

Recordkeeping Requirements 7
- Confidentiality 7
- Operating Record 7
- Annual Report Requirement 9
- Sampling/monitoring Recordkeeping Requirements 9
- Waste Minimization Requirements 10

Off-site Shipments/manifest Requirements 11
- Manifest Requirements/wastes Received On-site 11

Waste Analysis/waste Analysis Plan 11
- General Requirements 12
- Waste Analysis Quality Assurance Requirements 12

General Inspection Requirements 14

Security Provisions/facility Operation 15

Personnel Training 16

Required Equipment 16

Contingency Plan Requirements 17
- Emergency Procedures 17
- Emergency Authorities 18
- Emergency Coordinator 18
- Amendment of Plan 18
- Implementation of Plan 19

Contingency Plan Requirements 20
- Closure Plan/amendment 20
- Closure Activities 20

Requirements for Ignitable, Reactive or Incompatible Wastes 22

Storage of Hazardous Wastes in Containers 24
- Condition of Containers 25
- Inspections 25
- Containment System 26
- Required Aisle Space 27
- Closure and Post-closure 27
- Container Storage of Residual Waste 27

Land Disposal Restriction Requirements 28
- Prohibition Against Dilution 28
- Generator Requirements 28
- Notification/certification 29
- Storage of Land Disposal Restricted Wastes 31

OHIO PART B PERMITTED FACILITY
RCRA INSPECTION CHECKLIST

cility: Portsmouth Gaseous Diffusion Plant Ohio Permit #: 04-66-0680

Co-operator: LATA/Parallax Portsmouth, LLC

Address: 3930 U.S. Route 23 South
Piketon, OH 45661

USEPA ID#: OH7890008983
Facility Phone: 740-897-5010

County: Pike

Time: 8:00 a.m. - 5:30 p.m.

Inspection Date: 6/22/2009

Advance notice of inspection given? ___(Yes) __X_(No)
If so, how far in advance? _____

	Name	***Agency/Title***	***Phone***
Inspector(s):	Walt Francis	U.S. EPA	312-353-4921
	Melody Stewart	Ohio EPA	740-380-5256
Facility	Melda Rafferty	USDOE	740-897-5010
	Rosemary Richmond	LPP	740-897-5010
Representative(s):			

Is facility operating as a generator? Yes __X_____ No

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

PERMIT STATUS

Permit Issued: March 15, 2001
Permit Effective Date: March 15, 2001
Permit Expiration Date: March 15, 2011

STORAGE		TREATMENT		DISPOSAL	
X	Container		Tank		Injection Well
	Tank		Surface Impoundment		Landfill
	Waste Pile		Incinerator		Land Application
	Surface Impoundment		Thermal Treatment		Surface Impoundment

PROCESS DESCRIPTION

Historically, the main function of the DOE-PORTS facility was to enrich uranium for military use (nuclear submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in UF6 feedstock which contains 0.711% U235. However, in 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). USDOE retained ownership of the ongoing site environmental restoration program as well as two permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and are leased by USEC. These include decontamination of equipment and uranium recovery (X-705 Bldg.); chemical cleaning of equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); photo and printing lab (X-100); vehicle repair (X-750); coal pile runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in DOE owned and permitted storage facilities. Waste generated by DOE from the environmental restoration is also stored in these facilities. USEC ceased the enrichment process in May 2001.

WASTE MANAGEMENT, GENERATION AND AMOUNT

Uranium contaminated hazardous wastes (mixed waste) which were/are generated by USEC and DOE are stored on-site in DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of TSDs in the U.S. which could accept mixed waste, and a May 1991 DOE moratorium on off-site waste shipment. A large percentage of the waste generated at PORTS is DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in DOE-owned storage areas. During the past year, numerous shipments of hazardous waste were manifested off-site by both DOE and USEC. This is due to an increase in treatment capacity at off-site commercial treatment facilities and DOE treatment facilities, the lifting of the moratorium, and the execution of the site treatment plans for DOE and USEC. DOE sends some waste off-site (to USDOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to DOE for storage in the interim prior to their final disposal.

Hazardous

The DOE Part B permit lists numerous hazardous waste codes for wastes that are generated by the above processes and the environmental restoration. These are stored in drums ranging in size from 30 to 110 gallon capacity, 5 gallon containers, 20 gallon lab packs, 5' cans, 4'x4'x6' boxes, 4'x4'x8' boxes, polybottles and laboratory bottles.

Nonhazardous

A wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes.

HAZARDOUS WASTE MANAGEMENT UNITS

The following DOE-owned permitted storage facilities were inspected during the CEI:

-X-7725 Container Storage Facility
-X-326 Container Storage Facility

In addition, DOE-owned and operated HWMUs and SAAs were inspected in the following buildings:

		-X-326	-X-622
-X-7725	-X-624		
-X-623	-X-627		
--X-333	-X-330		
–X-701B	-X-770		
-X-345	-X-700		

REGULATORY/ENFORCEMENT HISTORY

As a result of violations of state and federal hazardous waste regulations found during the 1987, 1988, and 1989 OEPA RCRA inspections, USDOE and OEPA entered into a Consent Decree governing restoration of the environment at DOE-PORTS. This decree includes a requirement that DOE close the X-701B, X-749, X-231B, and X-616 units within specific timeframes. The X-749, X-616 and X-231B units have now been closed. X-701B is yet to be closed.

On October 4, 1995, DFFOs were signed which allowed DOE to store LDR wastes in excess of one year, so long as waste is being stored in compliance with the orders and an approved site treatment plan. These orders supercede the May 18, 1993, DFFOs.

On February 24, 1998, DOE, LMES and Ohio signed DFFOs and a Consent Order regarding past violations and the management of DUF6 and LiOH. This order was amended on March 12, 2004 and June 23, 2005. The latest amendment added LLP and UDS to the order.

On March 18, 1999, DOE and Ohio EPA signed DFFOs. These DFFOs provide exemptions to DOE and integrate the following unclosed units into the CMS/CMI process: X-749, X-231B, X-701C, X701B, X-230J7, and X-744Y.

A Part B permit was issued to DOE and its current co-operator, Bechtel Jacobs, for the X-7725 and X-326 storage facilities on March 15, 2001.

GENERAL CONDITIONS OF PERMIT

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1	Has the expiration date of the permit passed? If so:	Yes__No_X_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 _X_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? (Or upon a later date if the permittee can demonstrate good cause for late submittal.) [Condition A.6.(a)]	Yes__No__ N/A _X_RMK#

NOTE: *The permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:*

A. The permittee has submitted a timely and complete application for a renewal permit under OAC rule 3745-50-40; and

B. Through no fault of the permittee, a new permit has not been issued pursuant to OAC rule 3745-50-40 on or before the expiration date of the permit. [Condition A.6.(b)]

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.26]	Yes X 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? [Condition A.1.(b) and A.5]	Yes__No X N/A ___RMK#
4.	Have any provisions of the permit been identified as invalid? [Condition A.4.]	Yes__No X N/A ___RMK#
5.	Has the facility identified any instances of noncompliance with the permit, RC Chapter 3734. or the rules adopted thereunder, which may endanger human health or the environment? If so:	Yes__No X N/A ___RMK#
	a. Did the facility immediately report orally the following to Ohio EPA's Emergency Response Section within 24 hours of becoming aware of the circumstance(s): [Condition A.20.(a)]	
	i. Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and	Yes__No__ N/A _X_RMK#
	ii. Information concerning a release of hazardous waste, fire or explosion at the facility which could threaten human health or the environment, including a description of:	
	A. Name, address and telephone number of the owner or operator?	Yes__No__ N/A _X_RMK#
	B. Name, address and telephone number of the facility?	Yes__No__ N/A _X_RMK#
	C. Name and quantity of material(s) involved?	Yes__No__ N/A _X_RMK#
	D. The extent of injuries, if any?	Yes__No__ N/A _X_RMK#
	E. An assessment of the actual or potential hazard to the environment and human health where this is applicable?	Yes__No__ N/A _X_RMK#

	F. Estimated quantity and disposition of recovered material that resulted from the incident?	Yes__No__ N/A _X_RMK#
6.	Did the permittee provide a written report to Ohio EPA's Emergency Response Section and DHWM, SEDO within five days of the time the permittee became aware of the circumstances reported in Question 5? [Condition A.21.] If so did the report contain:	Yes__No__ N/A _X_RMK#
	a. A description of the noncompliance and its cause (including exact dates and times)?	Yes__No__ N/A _X_RMK#
	b. Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue?	Yes__No__ N/A _X_RMK#
	c. Steps taken or planned to minimize the impact on human health and the environment and to reduce and prevent recurrence of the noncompliance?	Yes__No__ N/A _X_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 becomes aware of the circumstances. [Condition A.21.(c)]*

7.	Has the permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8]	Yes__No__ N/A _X_RMK#
8.	Has the permittee identified any other instances of noncompliance not provided for in Question 5?	Yes__No__ N/A _X_RMK#
	a. If so, did the permittee report to the director within a month of the time at which the permittee is aware of such noncompliance? [Condition A.22.]	Yes__No__ N/A _X_RMK#
	b. Do the reports provided contain the information set forth in Condition A.20?	Yes__No__ N/A _X_RMK#
9.	Has the permittee planned any physical alterations or additions to the permitted facility?	Yes__No_X_ N/A ___RMK#
	a. If so, has the facility provided Ohio EPA with notice of such changes? [Condition A.15]	Yes__No__ N/A _X_RMK#

Note: *Such notification does not waive the permittee's duty to comply with the permit pursuant to Condition A.5.*

REMARKS

PERMIT MODIFICATION, REVISION, REVOCATION

1.	Has the permittee filed a request for a permit modification, revision or revocation since issuance of the permit? [Condition A.2.]	Yes X No__ N/A ___RMK# 2009 – Treatment [illegible]
2.	Has the permit been transferred to a new owner or operator? [Condition A.18.] If so,	Yes__No X N/A ___RMK#
	a. Has the transfer been conducted in accordance with R.C. Chapter 3734. and the rules adopted thereunder? [Condition A.18.]; and	Yes__No__ N/A _X_RMK#
	b. Before transferring ownership did the permittee notify the new owner in writing of the requirements of R.C. Chapter 3734. and the rules adopted thereunder and the applicable Ohio hazardous waste rules? [Condition A.18.]	Yes__No__ N/A _X_RMK#
3.	Has the permittee submitted reports of compliance or noncompliance with, or any progress reports on the requirements contained 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 _X_RMK#
4.	Has the permittee furnished relevant information which Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, or to determine compliance with the permit? [Condition A.10]	Yes X No__ N/A ___RMK#
5.	Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10]	Yes X No__ N/A ___RMK#
6.	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 HWFB? If so,	Yes__No X N/A ___RMK#
	a. Has the permittee promptly submitted such facts or corrected information to the appropriate entity? [Condition A.24.]	Yes__No__ N/A _X_RMK#
7.	Is the permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications to the application? [Condition A.14.(c)]	Yes X No__ N/A ___RMK#

8.	Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14.(c)]	Yes X No ___ N/A ___ RMK#

REMARKS

ITE ENTRY - AVAILABILITY OF RECORDS

1.	As specified in Condition A.11., has the permittee allowed the director or an authorized representative, upon proper identification and upon stating the purpose and necessity of an inspection, 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 X No___ N/A ___RMK#
	b. Have access to and copy any records required to be kept under the conditions of the permit?	Yes X No___ N/A ___RMK#
	c. Inspect at reasonable times facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit?	Yes X No___ N/A ___RMK#
	d. Sample, document, or monitor any substance or parameter at any location of the facility to assure compliance with the permit or as otherwise authorized by R.C. Chapter 3734. and the rules adopted thereunder?	Yes X No___ N/A ___RMK#

RECORDKEEPING REQUIREMENTS

CONFIDENTIALITY

1.	Has the permittee requested confidentiality of any information of the permit in accordance with R.C. Chapter 3734 and the rules adopted thereunder? [Condition A.25.]	Yes__No_X_N/A ___RMK#

OPERATING RECORD

2.	Is the permittee maintaining a written operating record at the facility as set forth in OAC rule 3745-54-73 and Condition B.22. of the permit which contains the following elements:	
	a. A description and the quantity of each hazardous waste received?	Yes X No___ N/A ___RMK#
	b. Method(s) and date(s) of treatment, storage or disposal at the facility?	Yes X No___ N/A ___RMK#
	c. The location of each hazardous waste within the facility and the quantity at each location?	Yes X No___ N/A ___RMK#
3.	Is the permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents as part of its operating record: [Condition A.28.]	
	a. Waste analysis plan in accordance with OAC rule 3745-54-13 and the conditions of the permit?	Yes X No___ N/A ___RMK#
	b. Contingency plan in accordance with OAC rule 3745-54-53 and the conditions of the permit?	Yes X No___ N/A ___RMK#
	c. Closure plan in accordance with OAC rule 3745-55-12 and the conditions of the permit?	Yes X No___ N/A ___RMK#
	d. Personnel training plan and records required by OAC rule 3745-54-16 and the conditions of the permit?	Yes X No___ N/A ___RMK#
	e. Inspection schedules developed in accordance with OAC rules 3745-54-15 and 3745-55-74 and the conditions of the permit?	Yes X No___ N/A ___RMK#
4.	Have any of the documents identified in Question #3 been revised as required by the permit? If so,	Yes X No___ N/A ___RMK#
	a. Has the permittee submitted the revisions to Ohio EPA? [Condition A.28.(b)]	Yes X No___ N/A ___RMK#
	b. Has the permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.28.(b)]	Yes X No___ N/A ___RMK#

5	Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from the date of inspection? [Condition A.28.(c)]	Yes_X_No___ N/A ___RMK#

ANNUAL REPORT REQUIREMENT

6.	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 and the conditions of the permit? [Condition B.25.]	Yes X No___ N/A ___RMK#

SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS

7.	In compliance with Condition A.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 X No___ N/A ___RMK#
	b. Individual(s) who performed the sampling or measurement?	Yes X No___ N/A ___RMK#
	c. Date(s) analyses were performed?	Yes X No___ N/A ___RMK#
	d. Individual(s) who performed the analyses?	Yes X No___ N/A ___RMK#
	e. Analytical technique(s) or method(s) used?	Yes X No___ N/A ___RMK#
	f. Results of such analyses?	Yes X No___ N/A ___RMK#
8.	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 A.12.(a)]	Yes X No___ N/A ___RMK#
9.	Has Ohio EPA requested submittal of any reports or other information required by the conditions of the permit from the permittee? If so,	Yes___No X N/A ___RMK#
	a. Have the submittals been signed and certified according to OAC rules 3745-50-58(K) and 3745-50-42? [Condition A.13.]	Yes___No___ N/A X RMK#

STE MINIMIZATION REQUIREMENTS

10.	Has the permittee submitted a Waste Minimization Report to Ohio EPA meeting the requirements of Condition A.29. of the permit within 180 days of permit journalization?	Yes X No ___ N/A ___ RMK#

	a. Following the first submittal as identified above in Question #10, has the permittee submitted biennial updates to this report as required by Condition A.29.(c)?	Yes X No ___ N/A ___ RMK#

REMARKS

F-SITE SHIPMENTS/MANIFEST REQUIREMENTS

1	Is all hazardous and mixed waste transported from the facility by a properly registered transporter of hazardous and mixed waste in accordance with all applicable laws, rules and standards? [Condition A.16.]	Yes X No ___ N/A ___ RMK#

MANIFEST REQUIREMENTS/WASTES RECEIVED ON-SITE

2.	Upon receipt of the manifests, has the permittee signed and dated each copy of the manifest? [OAC 3745-54-71(A)(1); Condition B.24.]	Yes X No___ N/A ___RMK#
3.	For any significant discrepancies identified upon receipt of the manifest(s): did the permittee note such discrepancies on the manifest(s) in accordance with OAC rule 3745-54-71(A)(2) and Condition B.24?	Yes___No___ N/A _X_RMK#
	a. Did the permittee attempt to reconcile the discrepancy? [Condition B.24.]	Yes___No___ N/A _X_RMK#
	b. If the discrepancy was not resolved within 15 days: did the permittee submit a report, including a copy of the manifest, to the director in accordance with OAC rule 3745-54-72(B)? [Condition B.24.]	Yes___No___ N/A _X_RMK#
4.	Does the permittee immediately give the transporter at least one copy of the signed manifest? [OAC 3745-54-71(A)(3); Condition B.24.]	Yes X No___ N/A ___RMK#
5.	Does the permittee provide the generator with a copy of the manifest within 30 days of receipt of waste on-site? [OAC 3745-54-71(A)(4); Condition B.24.]	Yes X No___ N/A ___RMK#
6.	Does the permittee retain a copy of each manifest on-site for at least three years from the date of delivery? [OAC 3745-54-71(A)(5); Condition B.24.]	Yes X No___ N/A ___RMK#
7.	Has the permittee received any hazardous waste or mixed waste from off-site, other than as described in Condition B.2(b)?	Yes___No X N/A ___RMK#

WASTE ANALYSIS/WASTE ANALYSIS PLAN

GENERAL REQUIREMENTS

1.	Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information which is necessary to properly treat, store or dispose of the waste in accordance with OAC Chapters 3745-54 to 3745-57 and Condition B.3 of the permit (Section C of the approved permit application)? [OAC 3745-54-13(A)(1)]	Yes_X_No___ N/A ___RMK#
2.	Since the last inspection, were any wastes generated by the facility which were unable to be characterized through process knowledge? If so,	Yes___No_X_ N/A ___RMK#
	a. Were the waste analysis procedures described in Section C of the approved permit application followed?	Yes___No___ N/A _X_RMK#
3.	Is the permittee following the procedures described in the approved waste analysis plan (Section C of approved permit application) and the requirements of OAC rule 3745-54-13? [Condition B.3.]	Yes_X_No___ N/A ___RMK#
4.	Is the permittee maintaining waste analysis data in the facility's operating record as required by OAC rule 3745-54-73 and Condition B.22. of the permit?	Yes_X_No___ N/A ___RMK#

WASTE ANALYSIS QUALITY ASSURANCE REQUIREMENTS

5.	Is the permittee verifying the analysis of each waste stream annually as part of its quality assurance program in accordance with SW-846? [Condition B.3.]	Yes X No___ N/A ___RMK#
6.	In accordance with Condition B.3. of the permit, does the permittee's quality assurance plan ensure that the permittee is, at a minimum:	
	a. Maintaining property functional instruments?	Yes X No___ N/A ___RMK#
	b. Using approved sampling/analytical methods?	Yes X No___ N/A ___RMK#
	c. Verifying the validity of sampling and analytical procedures and performance of correct calculations?	Yes X No___ N/A ___RMK#
7.	If the permittee uses a contract laboratory to perform analyses, did the permittee inform the laboratory in writing that it must operate under the waste analysis conditions set forth in this permit?	Yes X No___ N/A ___RMK#

REMARKS

GENERAL INSPECTION REQUIREMENTS

1.	Is the permittee following the inspection procedures and schedules described in Section F of the approved permit application and the requirements of OAC rule 3745-54-15? [Condition B.5.]	Yes X No__ N/A __RMK#
2.	Does the permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [OAC 3745-54-15(A)(1)(2)]	Yes X No__ N/A __RMK#
3.	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?	Yes X No__ N/A __RMK#
	a. Is the schedule kept at the facility? [OAC 3745-54-15(B)(2)]	Yes X No__ N/A __RMK#
	b. Does the schedule identify the types of problems which are to be looked for during the inspection? [OAC 3745-54-15(B)(3)]	Yes X No__ N/A __RMK#
	c. Does the schedule include inspection of areas subject to spills daily when in use and according to other applicable regulations when not in use? [OAC 3745-54-15(B)(4)]	Yes X No__ N/A __RMK#
4.	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 X No__ N/A __RMK#
5.	Is the permittee maintaining records of inspections for a minimum of three years? [Condition B.5.]	Yes X No__ N/A __RMK#
6.	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 X No__ N/A __RMK#
	b. Signature of inspector?	Yes X No__ N/A __RMK#
	c. Notation of observations made?	Yes X No__ N/A __RMK#
	d. Date/nature of any repairs or other remedial actions?	Yes X No__ N/A __RMK#

SECURITY PROVISIONS/FACILITY OPERATION

1.	Is the permittee complying with the security provisions of OAC rule 3745-54-14(B)(1) and B(2) and (C) and Section F of the approved permit application, including the following: [Condition B.4.]	
	a. Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility;	Yes X No__ N/A ___RMK#
	b. An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility; or	Yes X 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 X No__ N/A ___RMK#
2.	In accordance with OAC rule 3445-54-14(C), does the permittee have signs reading "Danger-Unauthorized Personnel Keep Out" posted at each entrance and at other locations and in sufficient numbers to be seen when approaching the active portion of the facility? [Condition B.4.]	Yes X No__ N/A ___RMK#
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 waters? [Condition B.1.]	Yes X No__ N/A ___RMK#

PERSONNEL TRAINING

1.	Is the facility conducting personnel training in accordance with Section H of the approved permit application and the following requirements of OAC rule 3745-54-16: [Condition B.6.]	
	a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC 3745-54-16(A)(B)(C)]	Yes X 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 3745-54-16(B)?	Yes X No___ N/A ___RMK#
	c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(B)?	Yes X 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 X No___ N/A ___RMK#

REQUIRED EQUIPMENT

1.	Is the permittee, at a minimum, maintaining the equipment set forth in the approved permit application (Section G) at the facility? [Condition B.9.]	Yes X No___ N/A ___RMK#
2.	Is the permittee inspecting, testing, and maintaining the equipment specified in Question #1 to assure its proper operation as specified in OAC rule 3745-54-33, the inspection plans and Section G of the approved permit application? [Condition B.10.]	Yes X 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 Section G of the approved permit application? [Condition B.11.]	Yes X No___ N/A ___RMK#

ONTINGENCY PLAN REQUIREMENTS

IERGENCY PROCEDURES

1.	In compliance with Condition B.13.(a) of the permit, does the permittee:	
	a. Familiarize the emergency response agencies likely to respond to an emergency at the facility with:	
	i. The location and layout of the facility?	Yes X No__ N/A ___RMK#
	ii. Properties of hazardous waste and mixed waste managed at the facility and associated hazards?	Yes X No__ N/A ___RMK#
	iii. Places where facility personnel will normally be working?	Yes X No__ N/A ___RMK#
	iv. Entrances to and roads inside the facility?	Yes X No__ N/A ___RMK#
	v. Evacuation routes as depicted in Section G of the permit application?	Yes X No__ N/A ___RMK#
	b. Inform emergency response agencies of safety equipment, supplies, proper emergency procedures that are applicable to the facility, and any further requirements imposed by the permit?; and	Yes X No__ N/A ___RMK#
	c. Familiarize local police and fire departments, local hospitals and other local emergency services with the properties of hazardous waste and mixed waste managed at the facility and the types of injuries which could result from fires, explosions or a release of hazardous wastes at the facility?	Yes X No__ N/A ___RMK#
2.	Is the permittee in compliance with the requirements of OAC rule 3745-54-56 and Section G of the approved permit application regarding emergency procedures? [Condition B.20.]	Yes X No__ N/A ___RMK#

ERGENCY AUTHORITIES

3.	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_X_ 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 _X_RMK#
4.	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.]	Yes_X_No__ N/A ___RMK#
5.	Has the permittee notified the agencies in Question #4, in writing, within ten days of the effective date of any amendments or revisions to the Plan? [Condition B.18.(b)]	Yes_X_No__ N/A ___RMK#
6.	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 in accordance with OAC rule 3745-54-53? [Condition B.18.(c)]	Yes_X_No__ N/A ___RMK#

EMERGENCY COORDINATOR

7.	Is the permittee in compliance with the requirements of OAC rule 3745-54-55 with regard to the emergency coordinator? [Condition B.19.]	Yes_X_No___ N/A ___RMK#

AMENDMENT OF PLAN

8.	Is the permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17.]	Yes X No___ N/A ___RMK#

Note: *Also see Question #4 of RECORDKEEPING REQUIREMENTS to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.*

PLEMENTATION OF PLAN

9.	Has there been a fire, explosion or release of hazardous waste or mixed waste or constituents at the facility since the last date of inspection as described by Condition B.14. of the permit? If so,	Yes__No_X_ 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? [Condition B.14.]	Yes__No__ N/A _X_RMK#
	b. Did the permittee collect and manage released material, emergency response material and by-products as hazardous waste or mixed waste until making a demonstration to Ohio EPA that such materials are not subject to Ohio hazardous waste rules? [Condition B.16.]	Yes__No__ N/A _X_RMK#
	c. 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 _X_RMK#
	i. Did the report contain the elements set forth in OAC rule 3745-54-56(J)? [Condition B.23.] ***Note:*** *See also Conditions A.21. and A.22. of the permit for additional reporting/recordkeeping requirements.*	Yes__No__ N/A _X_RMK#
	d. 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? [Condition B.23.]	Yes__No__ N/A _X_RMK#

REMARKS

ONTINGENCY PLAN REQUIREMENTS

OSURE PLAN/AMENDMENT

1.	Is the permittee maintaining at the facility, the approved closure plan which contains the elements set forth in OAC rule 3745-55-12? [Condition B.29.]	Yes X No___ N/A ___RMK#
2.	Has the permittee amended the closure plan? If so,	Yes___No X N/A ___RMK#
	a. Has the plan been amended in accordance with OAC rule 3745-55-12(C)? [Condition B.28.]	Yes___No___ N/A X 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.*

CLOSURE ACTIVITIES

3	Has the permittee closed the facility? If so,	Yes__No_X_ N/A ___RMK#
	a. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26.]	Yes__No__ N/A _X_RMK#
	b. Did the permittee carry-out the approved closure plan as set forth in the permit application and terms and conditions of the permit? [Condition B.26.]	Yes__No__ N/A _X_RMK#
	c. After receiving the final volume of hazardous waste, did the permittee remove from the facility all hazardous waste and mixed 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 _X_RMK#
	d. 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 _X_RMK#
	e. Did the permittee notify Ohio EPA's Southeast District Office within five working days prior to all rinseate and soil sampling? [Condition B.32.(b)]	Yes__No__ N/A _X_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 _X_RMK#

REMARKS

REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES

1.	Is the permittee following the procedures as specified in OAC rules 3745-54-17, 3745-55-77 and Section F of the approved application when managing ignitable, reactive and/or incompatible wastes? [Conditions B.7.(a) and C.10. and C.11.]	Yes X No ___ N/A ___ RMK#
2.	Does the permittee ***not*** store incompatible waste ***except*** in accordance with OAC rules 3745-54-17(B) and 3745-55-77, and the terms and conditions of this permit? [Condition C.11.(a)]	Yes X No ___ N/A ___ RMK#
3.	Does the permittee take precautions to prevent placing hazardous waste or mixed waste in an unwashed container that previously held an incompatible waste or material? [Condition C.11.(b)]	Yes X No ___ N/A ___ RMK#
4.	Does the permittee ensure that all containers of incompatible wastes are physically separated from other incompatible wastes or materials by a wall, berm, dike, or other device in accordance with OAC rule 3745-55-77 and the Appendix to OAC rule 3745-55-99? [Condition C.11.(c)]	Yes X No ___ N/A ___ RMK#
	a. Are all containers of aqueous hazardous acids (ph $\leq$ 2) and caustics ph $\geq$ 12.5) sorted on different pallets and physically separated in different rooms? [Condition C.11.(c)]	Yes X No ___ N/A ___ RMK#
	b. Are aqueous acids and caustics in poly bottles, and other containers requiring nuclear criticality safety spacing physically separated in the same room by a dike? [Condition C.11.(c)]	Yes X No ___ N/A ___ RMK#
	c. Are containers of cyanides and sodium metals being stored in rooms physically separate from other incompatible wastes or other incompatible materials? [Condition C.11.(c)]	Yes X No ___ N/A ___ RMK#
5.	Does the permittee provide electrical grounding for all containers, tanks and transport vehicles during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(b)]	Yes X No ___ N/A ___ RMK#
6.	Does the permittee provide and require the use of spark proof tools during all operations involving the handling of flammable and/or combustible wastes? [Condition B.7.(c)]	Yes X No ___ N/A ___ RMK#

7.	Does the permittee prohibit smoking and open flames in areas where hazardous wastes are managed and post appropriate signs? [Condition B.7.(d)]	Yes X No___ N/A ___RMK#

8.	As required by OAC rule 3745-55-76, does the permittee store containers of ignitable or reactive wastes greater than 15 meters (50 feet) away from the Portsmouth Gaseous Diffusion Plant reservation boundary? [Condition C.10.(a)]	Yes X No___ N/A ___RMK#

REMARKS

ORAGE OF HAZARDOUS WASTES IN CONTAINERS

OTE: *The requirements of permit 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.*

1.	Is the permittee storing in containers, only those wastes as specified in Section A of the Part B permit application? [Condition C.1.(a), C.2.]	Yes X No___ N/A ___RMK#

2.	Does the permittee limit the total quantity of containerized waste in the container storage area to 133,000 gallons at any given time in the permitted container areas, located in building X-326 and no more than 5,456,000 gallons at any given time in the permitted storage areas located in building X-7725? [Condition C.1.(a)]	Yes X No___ N/A ___RMK#

NOTE: *For the purposes of compliance with the capacity limitation of the permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity. For example, a 55-gallon drum will be considered to be holding 55 gallons of waste, regardless of the actual quantity stored in the drum. [Condition C.1.(b)]*

3.	When accumulating waste within the permitted X-7725 and X-326 container storage area, does the permittee ensure that the total amount of waste (both > 90 days and < 90 days) does not exceed the maximum container storage inventory established under Condition C.1.? [Condition C.1.(c)]	Yes X No__ N/A ___RMK#
4.	Are hazardous wastes subject to regulation by the permit stored only at the designated container storage area described in the approved permit application? (See Section D of the permit application) [Condition C.1.(a)]	Yes X No__ N/A ___RMK#
5.	Is each container stored clearly marked to identify its contents and the date each period of accumulation/storage begins? (See Section D of the permit application) [Condition C.3.]	Yes X No__ N/A ___RMK#
6.	Does the permittee store hazardous waste in the types of containers described in Section D of the approved permit application? [Condition C.1.(a)]	Yes X No__ N/A ___RMK#

CONDITION OF CONTAINERS

8.	Are containers holding hazardous wastes in good condition? [Condition C.3.]	Yes X No__ N/A __RMK#
	a. If not, (e.g., severe rusting, structural defects) did the permittee transfer the hazardous waste from such a container to a container that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit and OAC rule 3745-55-71? [Condition C.3.]	Yes__No_ N/A _X__RMK#
9.	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 C.4.]	Yes X No__ N/A __RMK#
10.	Is storage conducted in the container storage containment system as described in Condition C.1. of the permit and Section D of the approved permit application? [Condition C.5.(a)]	Yes X No__ N/A __RMK#
11.	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 C.5.(b)]	Yes X No__ N/A __RMK#
12.	Are lab-pack wastes handled in compliance with applicable storage requirements? [Condition C.5.(c)]	Yes X No__ N/A __RMK#
13.	Are lab-pack wastes packaged in drums containing absorbent material that is compatible with the wastes? [Condition C.5.(d)]	Yes X No__ N/A __RMK#

INSPECTIONS

14.	Is the permittee inspecting the container area weekly in accordance with OAC rules 3745-54-15, and 3745-54-73 and the approved inspection schedule (Section F) to detect leaking containers and deterioration of containers and the containment system? [Condition C.8.]	Yes X No__ N/A ___RMK#
	a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken? [Condition C.8.]	Yes X No__ N/A ___RMK#
	b. On days when containerized waste are added or removed to and/or from any of the permitted areas for storage, does the permittee conduct inspections as described in Section F of the approved Part B permit application and maintain the inspection results in the facility operating record? [Condition C.8.]	Yes X No__ N/A ___RMK#

CONTAINMENT SYSTEM

15.	Does the permittee maintain the containment system as described in Section D of the approved Part B permit application, including: [Condition C.6.]	Yes X No___ N/A ___RMK#
	a. Sufficient design to contain 10% of the total volume of the containers or the volume of the largest container, whichever is greater? [Condition C.6.(b)]	Yes X No___ N/A ___RMK#
	b. A system which is free of gaps and sufficiently impervious to contain leaks and spills?	Yes X No___ N/A ___RMK#
	c. Equipped with a coating which is compatible with each waste stored in the area?	Yes X No___ N/A ___RMK#
	d. *For those wastes which are deemed incompatible with liner material:* Has the permittee installed a separate secondary containment structure within the existing structure which is equipped with a compatible liner?	Yes___No___ N/A X RMK#
16.	Has the permittee had a spill or leak of wastes or an accumulation of precipitation in the containment system? If so,	Yes___No X N/A ___RMK#
	a. Are spilled or leaked wastes and accumulated precipitation removed from the sump or collection area in a timely manner? [Condition C.6.(c)]	Yes___No___ N/A X RMK#
	b. Does removal of spilled/leaked wastes and accumulated precipitation occur within 24 hours from the time the spill or leak waste is discovered? [Condition C.6.(c)]	Yes___No___ N/A X RMK#

REQUIRED AISLE SPACE

17.	Is the permittee maintaining aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in the event of an emergency to any area of the facility as required by OAC rule 3745-54-35? [Condition B.12.]	Yes X No___ N/A ___RMK#

CLOSURE AND POST-CLOSURE

18.	At closure of the container storage area, did the permittee remove all hazardous waste, hazardous waste residues, mixed waste and mixed waste residues from the containment system, in accordance with the procedures set forth in the approved closure plan (Section I of the permit application)? [Condition C.13.(a)]	Yes___No___ N/A _X_RMK#

19.	During closure, if the permittee could not demonstrate that all contaminated soils could be removed, did the permittee close the unit and perform post-closure care following a plan approved by Ohio EPA? [Condition C.13.(b)]	Yes___No___ N/A _X_RMK#

CONTAINER STORAGE OF RESIDUAL WASTE

20.	Is the permittee complying with the provisions of Section C-2E of the application as amended pursuant to Condition B.2.(b) of this permit?	Yes X No___ N/A ___RMK#

LAND DISPOSAL RESTRICTION REQUIREMENTS

PROHIBITION AGAINST DILUTION

1.	Has the permittee updated the annual Federal Facility Compliance Act Schedule? [OAC rule 3745-270-50; Condition B.36.]	Yes X No___ N/A ___RMK#
2.	Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [OAC rule 3745-270-40 through 49; Condition B.36.(c)]	Yes___No X N/A ___RMK#
	a. As a substitute for adequate treatment to achieve compliance with LDR treatment standards?	Yes___No___ N/A X RMK#
	b. To circumvent the effective date of a prohibition (e.g., to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)?	Yes___No___ N/A X RMK#
	c. To otherwise avoid a prohibition in OAC rule 3745-270-30 through -39?	Yes___No___ N/A X RMK#
	d. To otherwise avoid a prohibition imposed by Section 3004(d) of RCRA?	Yes___No___ N/A X RMK#

NOTE: *If the answer to any of Questions 2(a) through 2(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of OAC rule 3745-270-03 [Condition B.36.]. Dilution of wastes is permissible under some conditions. See OAC rule 3745-270-03(B).*

GENERATOR REQUIREMENTS

3.	Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [OAC rule 3745-270-07; Condition B.36.(e)]	Yes X No_ N/A ___RMK#
	a. ***For determinations based solely on knowledge of the waste***: Is supporting data used to make this determination being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)]	Yes X No___ N/A ___RMK#
	b. ***For determinations based upon analytical testing***: Is a copy of waste analysis data being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)]	Yes X No___ N/A ___RMK#
4.	Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g., wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [OAC rule 3745-270-07; Condition B.36.(e)]	Yes X No___ N/A ___RMK#
5.	Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [OAC rule 3745-270-07(A); Condition B.36.(e)]	Yes X No___ N/A ___RMK#
6.	Does the entity generate any listed waste(s) which are restricted from land disposal? If so,	Yes X No___ N/A ___RMK#
	a. Do such wastes also exhibit hazardous waste characteristics as identified in OAC rules 3745-51-20 to 3745-51-24?	Yes X No___ N/A ___RMK#
	b. ***For listed wastes which also exhibit a characteristic***: Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [OAC rule 3745-270-09(A)]	Yes X No___ N/A ___RMK#

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC rule 3745-270-09(B)].*

NOTIFICATION/CERTIFICATION

7	***For wastes that do not meet treatment standards:*** Has the generator submitted a one-time written notice to the treatment/storage facility receiving the wastes, that wastes being received do not meet treatment standards? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)]	Yes X No ___ N/A ___ RMK#
	If so, does the notice including the following:	
	a. EPA hazardous waste number? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)]	Yes X No ___ N/A ___ RMK#
	b. Appropriate treatment standard for the waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)]	Yes X No ___ N/A ___ RMK#
	c. The manifest number associated with the first shipment of waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)]	Yes X No ___ N/A ___ RMK#
	d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)]	Yes X No ___ N/A ___ RMK#
	e. Applicable wastewater/non-wastewater category [OAC rule 3745-270-07(A)(2); Condition B.36.(j)]	Yes X No ___ N/A ___ RMK#
	f. For hazardous debris, list the contaminants subject to treatment, as described in paragraph (B) of OAC rule 3745-270-45; and an indication that these contaminants are being treated to comply with OAC rule 3745-270-45.	Yes X No ___ N/A ___ RMK#

LARGE QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

GENERAL REQUIREMENTS

1. Has the LQUWH obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)] — Yes ☒ No ☐ N/A ___ RMK#___

PROHIBITIONS

2. Did the LQUWH dispose of universal waste? [3845-273-31(A)] — Yes ☐ No ☒ N/A ___ RMK#___

3. Did the LQUWH dilute or treat universal waste, except when responding to releases or by managing specific wastes as provided in OAC 3745-273-33? [3745-273-31(B)] — Yes ☐ No ☒ N/A ___ RMK#___

WASTE MANAGEMENT AND LABELING/MARKING

UNIVERSAL WASTE BATTERIES:

4. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)] — Yes ☒ No ☐ N/A ___ RMK#___

5. If the batteries are contained, are the containers closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? — Yes ☒ No ☐ N/A ___ RMK#___

6. Does the LQUWH conduct any of the following activities:

   a. Sort batteries by type? — Yes ☒ No ___ N/A ___ RMK#___

   b. Mix battery types in one container? — Yes ___ No ☒ N/A ___ RMK#___

   c. Discharge batteries to remove the electric charge? — Yes ___ No ☒ N/A ___ RMK#___

   d. Regenerate used batteries? — Yes ___ No ☒ N/A ___ RMK#___

   e. Disassemble them into individual batteries or cells? — Yes ___ No ☒ N/A ___ RMK#___

   f. Remove batteries from consumer products? — Yes ___ No ☒ N/A ___ RMK#___

   g. Remove the electrolyte from the battery? — Yes ___ No ☒ N/A ___ RMK#___

If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-33(A)(2)] — Yes ☐ No___ N/A X RMK#___

7. If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of a hazardous waste? [3745-273-33(A)(3)] — Yes ___ No ☐ N/A X RMK#___

   a. If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)] — Yes ___ No ☐ N/A X RMK#___

   b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-33(A)(3)(b)] — Yes ___ No ☐ N/A X RMK#___

8. Are the battery(ies) or container(s) of batteries located with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-34(A)] — Yes ___ No ☐ N/A X RMK#___

UNIVERSAL WASTE LAMPS

9. Does the LQUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(D)(1) — Yes X No ☐ N/A ___RMK#___

10. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous constituents to the environment? [3745-273-33(D)(2)] — Yes X No ☐ N/A ___RMK#___

11. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamps?" [3745-273-34(E)]

Yes ☑ No ☐ N/A ___RMK#___

Note: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

12. ***ACCUMULATION TIME***

Is the waste accumulated for less than one year? [3745-273-35(A)]

Yes ☑ No___ N/A ___RMK#___

a. If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on handler to demonstrate) [3745-273-35(B)]

Yes ___ No ☐ N/A ☑ RMK#___

NOTE: Accumulation is defined as date generated or date received from another handler.

13. Has the length of time the universal waste has been accumulated documented by ***one*** of the following: [3745-273-35(C)]

Yes ☑ No ☐ N/A ___RMK#___

a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-35(C)(1)]

Yes ☑ No___ N/A ___RMK#___

b. Marking or labeling the individual item of universal waste with the date that it became a waste or was received? [3745-273-35(C)(2)]

Yes ☑ No___ N/A ___RMK#___

c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-35(C)(3)]

Yes___ No___ N/A ☑ RMK#___

d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-35(C)(4)]

Yes___ No___ N/A ☑ RMK#___

e. Placing the universal waste in a specific accumulation area and identifying the earliest that any universal waste in the area became a waste or was received? [3745-273-35(C)(5] — Yes ✓ No ___ N/A ___ RMK#___

f. Any other method which clearly demonstrates the length of time the universal waste has been accumulated from the date it became a waste or is received? [3745-273-35(C)(6)] — Yes ___ No ___ N/A ✓ RMK#___

EMPLOYEE TRAINING

14. Are employees thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36] — Yes ✓ No ❑ N/A ___ RMK#___

RESPONSE TO RELEASES

15. Were releases of universal waste and other residues immediately contained? [3745-273-37(A)] — Yes ✓ No ❑ N/A ___ RMK#___

16. Was the released material characterized? [3745-273-37(B)] — Yes ___ No ❑ N/A ✓ RMK#___

17. If the released material was a hazardous waste, was it managed as required in OAC 3745-50 through 3745-69? *(If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52)* [3745-273-37(C)] — Yes ___ No ❑ N/A ✓ RMK#___

OFF-SITE SHIPMENTS

NOTE: ***If a LQUWH self-transports wastes, then the handler must comply with the Universal Waste transporter requirements.***

18. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-38(A)] — Yes ✓ No ❑ N/A ___ RMK#___

NOTE: ***LQUWHs are prohibited to send waste to any other facility.***

19 If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-38(C)] — Yes ✓ No ❑ N/A ___ RMK#___

20. Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-38(D)] — Yes ✓ No ❑ N/A ___ RMK#___

21. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following: Yes ___ No ❑ N/A ✓ RMK#___

a. Receive the waste back? [3745-273-38(E)(1)] Yes___ No___ N/A ✓ RMK#___

b. Agree to where shipment will be sent? [3745-273-38(E)(2)] Yes___ No___ N/A ✓ RMK#___

22. If a handler rejects a partial or full load from another handler, does the receiver handler contact the originating handler and discuss one of the following: Yes ___ No ❑ N/A ✓ RMK#___

a. Sending the waste back to originating handler? [3745-273-38(F)(1)] Yes___ No___ N/A ✓ RMK#___

b. Sending the shipment to a destination facility? [3745-273-38(F)(2)] Yes___ No___ N/A ✓ RMK#___

23. If the handler received a shipment of hazardous waste that was not a universal waste, did the LQUWH immediately notify Ohio EPA? [3745-273-38(G)] Yes ___ No ❑ N/A ✓ RMK#___

24. If the handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-38(H)] Yes ___ No ❑ N/A ✓ RMK#___

TRACKING UNIVERSAL WASTE SHIPMENTS

25. Are universal waste received from another handler? If so: Yes__ No X N/A ___RMK#___

a. Is a record of each shipment kept? [3745-273-39(A)] Yes X No ❑ N/A ___RMK#___

NOTE: ***This record can be in the form of a log, invoice, manifest, bill of lading, or other shipping document. This also applies to question No. 35(a).***

26. Does the record include the following:

a. Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)] Yes X No ❑ N/A ___RMK#___

b. Quantity of each type of universal waste? [3745-273-39(A)(2)] Yes X No ❑ N/A ___RMK#___

c. Date received? [3745-273-39(A)(3)] Yes X No ❑ N/A ___RMK#___

27. Is universal waste shipped to another handler? If so: Yes X No__ N/A ___RMK#___

a. Is a record of each shipment kept? [3745-273-39(B)] Yes X No ❑ N/A ___RMK#___

28. Does the record include the following?

a. Name and address of universal waste handler, destination facility, or foreign destination? [3745-273-39(B)(1)] Yes X No ❑ N/A ___RMK#___

b. Quantity of each type of universal waste? [3745-273-39(B)(2)] Yes X No ❑ N/A ___RMK#___

c. Date shipped? [3745-273-39(B)(3)] Yes X No ❑ N/A ___RMK#___

29. Are records kept for three years? [3745-273-39(C)(1)(2)] Yes X No ❑ N/A ___RMK#___

EXPORTS

30. Is waste being sent to a foreign destination? If so: Yes__ No X N/A ___RMK#___

a. Does the large quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56 and 3745-52-57? [3745-273-40(A)] Yes ___ No ❑ N/A X RMK#___

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA "Acknowledgment of Consent" 3745-52-50 to -52-57? [3745-273-40(B)] Yes ___ No ❑ N/A ___ RMK#___

c. Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-40(C)] Yes ___ No ❑ N/A ___ RMK#___

REMARKS

USED OIL INSPECTION CHECKLIST (Long Version)

PROHIBITIONS

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 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [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#___

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 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [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#___

10. Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: — Yes__No___ N/A ___RMK#___

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 X RMK#___

b. Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour? Yes ___ No ❑ N/A X RMK#___

c. Are the combustion gases from heater vented to the ambient air? Yes ___ No ❑ N/A X RMK#___

11. Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#, unless the generator qualifies for an exemption pursuant to 3745-279-24 (self transportation or tolling agreements)? [3745-279-24] Yes X 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 X No ❑ N/A ___RMK#___

REMARKS

USED OIL TRANSPORTER AND TRANSFER FACILITIES

16.	Does the used oil transporter process used oil? [3745-279-41(A)] If so:	Yes__No__ N/A ___RMK#___
	Is the used oil transporter in com pliance with the requirements for processors/re-refiners in 3745-279-50 to 3745-279-59 (except as provided in 3745-279-41(B) and (C))? [3745-279-41(A)]	Yes ___ No ❑ N/A___RMK#___
17.	Has the used oil transporter notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-42(A)]	Yes ___ No ❑ N/A ___RMK#___
18.	Has the used oil transporter delivered all used oil to:	
	a. Another used oil transporter that has a U.S. EPA ID#? [3745-279-43(A)(1)]	Yes ___ No ❑ N/A ___RMK#___
	b. A used oil processing/re-refining facility that has a U.S. EPA ID#? [3745-279-43(A)(2)]	Yes ___ No ❑ N/A ___RMK#___
	c. An off-spec used oil burning facility that has a U.S. EPA ID#? [3745-279-43(A)(3)]	Yes ___ No ❑ N/A ___RMK#___
	d. An on-spec used oil burning facility? [3745-279-43(A)(4)]	Yes ___ No ❑ N/A ___RMK#___
19.	Has the used oil transporter complied with all applicable USDOT regulations (49 CFR 171 to 180)? [3745-279-43(B)]	Yes ___ No ❑ N/A ___RMK#___
20.	Has the used oil transporter had a discharge of used oil? If so:	Yes__No__ N/A ___RMK#___
	Did they take the appropriate action as outlined in 3745-279-43(C)?	Yes ___ No ❑ N/A ___RMK#___
21.	Has the used oil transporter determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? [3745-279-44(A)]	Yes ___ No ❑ N/A ___RMK#___
22.	Does the transporter retain all records of analyses and information used to comply with 3745-279-44 for at least three years? [3745-279-44(D)]	Yes ___ No ❑ N/A ___RMK#___
23.	Does the owner/operator of a used oil transfer facility:	
	a. Stored used oil in tanks, containers, or units subject to regulation under 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-45(B)]	Yes ___ No ❑ N/A ___RMK#___

b. Stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-45(C)] Yes ___ No ❑ N/A ___RMK#___

c. Provide secondary containment for containers used to store used oil as required by 3745-279-45(D)? [3745-279-45(D)] Yes ___ No ❑ N/A ___RMK#___

d. Provide secondary containment for existing aboveground tanks required by 3745-279-45(E)? [3745-279-45(E)] Yes ___ No ❑ N/A ___RMK#___

e. Provide secondary containment for new aboveground tanks as required by 3745-279-45(F)? [3745-279-45(F)] Yes ___ No ❑ N/A ___RMK#___

f. Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil?" [3745-279-45(G)] Yes ___ No ❑ N/A ___RMK#___

g. Upon detection of a release of used oil: [3745-279-45(H)]

i. Stopped the release? Yes ___ No ❑ N/A ___RMK#___

ii. Contained the release? Yes ___ No ❑ N/A ___RMK#___

iii. Cleaned up and managed the used oil and other materials? Yes ___ No ❑ N/A ___RMK#___

iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No ❑ N/A ___RMK#___

24. Does the used oil transporter keep a record of each shipment of used oil? [3745-279-46(A)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the generator, transporter or processor/re-refiner who provides the used oil for transport? [3745-279-46(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include the U.S. EPA ID# of the generator, transporter or processor/re-refiner (if applicable) that provides the used oil for transport? [3745-279-46(A)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include the quantity of used oil accepted? [3745-2679-46(A)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include the date of acceptance? [3745-279-46(A)(4)] Yes ✓ No ❑ N/A ___RMK#___

e. Does each record include the signature of a representative of the generator, transporter, processor/re-refiner that provided the used oil for transport? [3745-279-46(A)(5)] Yes ✓ No ❑ N/A ___RMK#___

25. Does the used oil transporter keep a record of each shipment of used oil that is delivered to another used oil transporter, burner, processor/re-refiner, or disposal facility? [3745-279-46(B)] Yes ✓ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the receiving facility or transporter? [3745-279-46(B)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include the U.S. EPA ID# of the receiving facility or transporter? [3745-279-46(B)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include the quantity of used oil delivered? [3745-279-46(B)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include the date delivered? [3745-279-46] Yes ___ No ❑ N/A ___RMK#___

e. Does each record include the signature of a representative of the receiving facility or transporter (intermediate rail transporters are not required to sign a record of delivery)? [3745-279-46(B)(5)] Yes ___ No ❑ N/A ___RMK#___

26. Does the used oil transporter who exports used oil to a foreign country comply with 3745-279-46(B)(1) to (B)(4)? [3745-279-46(C)] Yes ___ No ❑ N/A ___RMK#___

27. Does the used oil transporter retain all records required under 3745-279-46 for at least three years? [3745-279-46(D)] Yes ___ No ❑ N/A ___RMK#___

28. Does the used oil transporter generate residues from the storage or transportation of used oil? Yes___No___N/A ___RMK#___

If so, are they managed as specified in 3745-279-10(E)? [3745-279-47] Yes ___ No ❑ N/A ___RMK#___

REMARKS

USED OIL STANDARDS FOR PROCESSORS AND RE-REFINERS

29. Has the used oil processor and/or re-refiner notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-51(A)] — Yes ___ No ❑ N/A ___RMK#___

30. Does the owner/operator of a used oil processing or re-refining facility comply with the following:

a. Is the facility maintained and operated to minimize the possibility of fire, explosion, or release of used oil? [3745-279-52(A)(1)] — Yes ___ No ❑ N/A ___RMK#___

b. Is the facility equipped with the equipment in 3745-279-52(A)(2), if necessary? — Yes ___ No ❑ N/A ___RMK#___

c. Are all communication systems, alarm systems, fire protection equipment, spill control equipment, and decontamination equipment tested and maintained as required? [3745-279-52(A)(3)] — Yes ___ No ❑ N/A ___RMK#___

d. Is there access to communication or alarm system(s)? [3745-279-52(A)(4)] — Yes ___ No ❑ N/A ___RMK#___

e. Is the required aisle space being maintained? [3745-279-52(A)(5)] — Yes ___ No ❑ N/A ___RMK#___

f. Are arrangements maintained with local authorities? [3745-279-52(A)(6)] — Yes ___ No ❑ N/A ___RMK#___

31. Has the owner/operator of a used oil processing and re-refining facility complied with the following requirements:

a. Has a contingency plan been developed? [3745-279-52(B)(1)] — Yes ___ No ❑ N/A ___RMK#___

b. Does the contingency plan contain the requirements of 3745-279-52(B)(2)? — Yes ___ No ❑ N/A ___RMK#___

c. Have copies and revisions been maintained and submitted to all local authorities? [3745-279-52(B)(3)] — Yes ___ No ❑ N/A ___RMK#___

d. Is the contingency plan reviewed and amended whenever one of the events in 3745-279-52(B)(4) occurs? — Yes ___ No ❑ N/A ___RMK#___

e. Is an emergency coordinator on the premises or on call at all times to meet the requirements of 3745-279-52(B)(5) and (6)? — Yes ___ No ❑ N/A ___RMK#___

32. Does the used oil processor/re-refiner determine whether the total halogen content of the used oil being managed at the facility is above or below 1000 ppm? [3745-279-53(A)] Yes ___ No ❑ N/A ___RMK#___

33. Does/has the used oil processor/re-refiner:

a. Only store used oil in tanks, containers or units subject to regulation under 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-54(A)] Yes ___ No ❑ N/A ___RMK#___

b. Only store used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-54(B)] Yes ___ No ❑ N/A ___RMK#___

c. Provide secondary containment for containers as required by 3745-279-54(C)? Yes ___ No ❑ N/A ___RMK#___

d. Provide secondary containment for existing aboveground tanks as required by 3745-279-54(D)? Yes ___ No ❑ N/A ___RMK#___

e. Provide secondary containment for new aboveground tanks as required by 3745-279-54(E)? Yes ___ No ❑ N/A ___RMK#___

f. Label all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil" [3745-279-54(F)] Yes ___ No ❑ N/A ___RMK#___

g. Upon detection of a release of used oil, done the following in accordance with 3745-279-54(G):

i. Stopped the release? Yes ___ No ❑ N/A ___RMK#___

ii. Contained the release? Yes ___ No ❑ N/A ___RMK#___

iii. Cleaned up and managed the used oil and other materials? Yes ___ No ❑ N/A ___RMK#___

iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No ❑ N/A ___RMK#___

h. Performed closure of aboveground tanks and containers in accordance with 3745-279-54(H)? Yes ___ No ❑ N/A ___RMK#___

34. Has the owner/operator of the used oil processing/re-refining facility developed, kept on-site, and followed a written waste analysis plan which meets the requirements in 3745-279-53 and, if applicable 3745-279-72? [3745-279-55] Yes ___ No ❑ N/A ___RMK#___

35. Does the used oil processor/re-refiner keep a record of each shipment of used oil accepted for processing/re-refining? [3745-279-56(A)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the transporter who delivered the used oil to the processor? [3745-279-56(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include the name and address of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include the U.S. EPA ID # of the transporter who delivered the used oil to the processor/re-refiner? [3745-279-56(A)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include the U.S. EPA ID # (if applicable) of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining? [3745-279-56(A)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Does each record include the quantity of used oil accepted? [3745-279-56(A)(5)] Yes ___ No ❑ N/A ___RMK#___

f. Does each record include the date of acceptance? [3745-279-56(A)(6)] Yes ___ No ❑ N/A ___RMK#___

36. Does the used oil processor/re-refiner keep a record of each shipment of used oil that is shipped to a used oil burner, processor/re-refiner, or disposal facility? [3745-279-56(B)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the transporter who delivers the used oil to the burner, processor/re-refiner or disposal facility [3745-279-56(B)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include the name and address of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the bur ner, processor/re-refiner or disposal facility? [3745-279-56(B)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include the U.S. EPA ID# of the burner, processor/re-refiner or disposal facility who receives the used oil? [3745-279-56(B)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Does each record include the quan tity of used oil shipped? [3745-279-56-(B)(5)] Yes ___ No ❑ N/A ___RMK#___

f. Does each record include the date of shipment? [3745-279-56(B)(6)] Yes ___ No ❑ N/A ___RMK#___

37. Does the used oil processor/r e-refiner retain all records required under 3745-279-56 for at least three years? [3745-279-56(C)] Yes ___ No ❑ N/A ___RMK#___

38. Does the owner/operator keep an operating record at the facility? [3745-279-57(A)(1)] Yes ___ No ❑ N/A ___RMK#___

a. Does the operating record include recor ds and results of used oil analysis performed as described in the analysis plan required under 3745-279-55? [3745-279-57(A)(2)(a)] Yes ___ No ❑ N/A ___RMK#___

b. Are summary reports and details of all incidents that require implementation of the contingency plan as specified in 3745-279-52(B) maintained in the operating record? [3745-279-57(A)(2)(b)] Yes ___ No ❑ N/A ___RMK#___

39. Does the used oil processor/r e-refiner report to the director in the form of a letter, on a biennial basis by March 1, the following information:

a. The U.S. EPA ID#, name and address of the processor/re-refiner? [3745-279-57(B)(1)] Yes ___ No ❑ N/A ___RMK#___

b. The calendar year covered by the report? [3745-279-57(B)] Yes ___ No ❑ N/A ___RMK#___

c. The quantities of used oil accepted for processing/re-refining and the manner in which the used oil is processed/re-refined, including the specific processes employed? [3745-279-57(B)] Yes ___ No ❑ N/A ___RMK#___

40. Does the used oil processor/re- refiner, who initiates a shipment of used oil off-site, use a used oil transporter that has a U.S. EPA ID#? [3745-279-58] Yes ___ No ❑ N/A ___RMK#___

41. Does the used oil processor/re-refiner generate residues from the storage, processing or re-refining of used oil? [3745-279-59] Yes ___ No___ N/A ___RMK#___

If so, are the residues managed as specified in 3745-279-10(E)? [3745-279-59] Yes ___ No ❑ N/A ___RMK#___

REMARKS

STANDARDS FOR USED OIL BURNERS WHO BURN OFF-SPEC USED OIL FOR ENERGY RECOVERY

42. Is off-spec used oil fuel burned for energy recovery only in industrial furnaces identified in 3745-50-10, or boilers as defined in 3745-50-10 and identified in 3745-279-61(A)(2), or hazardous waste incinerators? [3745-279-61(A)] Yes ___ No ❑ N/A ___RMK#___

43. Does the used oil burner process used oil? [3745-279-61(B)] Yes___No___ N/A ___RMK#___

If so, have they complied with the requirements for processors in 3745-279-50 to 3745-279-59? [3745-279-61(B)] Yes ___ No ❑ N/A ___RMK#___

44. Has the used oil burner notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-62(A)] Yes ___ No ❑ N/A ___RMK#___

45. Does the used oil burner determine whether the total halogen content of the used oil being managed at the facility is above or below 1000 ppm? [3745-279-63(A)] Yes ___ No ❑ N/A ___RMK#___

46. Does the used oil burner retain records of all analyses conducted or information used to comply with 3745-279-63 for at least three years? [3745-279-63(D)] Yes ___ No ❑ N/A ___RMK#___

47. Does the used oil burner:

a. Only store used oil in tanks, containers; or units subject to regulation under 3745-54 to 3745-57 and 3745-205 or 3745-65 to 3745-69 and 3745-256? [3745-279-64(A)] Yes ___ No ❑ N/A ___RMK#___

b. Only stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? [3745-279-64(B)] Yes ___ No ❑ N/A ___RMK#___

c. Provided secondary containment for containers as required by 3745-279-64(C)? Yes ___ No ❑ N/A ___RMK#___

d. Provided secondary containment for existing aboveground tanks as required by 3745-279-64(D)? Yes ___ No ❑ N/A ___RMK#___

e. Provided secondary containment for new aboveground tanks as required by 3745-279-64(E)? Yes ___ No ❑ N/A ___RMK#___

f. Labeled all containers, aboveground tanks and fill pipes used for underground tanks with the words "Used Oil?" [3745-279-64(F)] Yes ___ No ❑ N/A ___RMK#___

g. Upon detection of a release of used oil, done the following in accordance with 3745-279-64(G):

i. Stopped the release? Yes ___ No ❑ N/A ___RMK#___

ii. Contained the release? Yes ___ No ❑ N/A ___RMK#___

iii. Cleaned up and managed the used oil and other materials? Yes ___ No ❑ N/A ___RMK#___

iv. Repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes ___ No ❑ N/A ___RMK#___

48. Does the used oil burner keep a record or each used oil shipment accepted for burning? [3745-279-65(A)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-65(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include the name and address of the generator or processor/re-refiner who sent the used oil to the burner? [3745-279-65(A)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-65(A)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include the U.S. EPA ID# (if applicable) of the generator or processor/re-refiner who sent the used oil to the burner? [3745-279-65(A)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Does each record include the quantity of the used oil accepted? [3745-279-65(A)(5)] Yes ___ No ❑ N/A ___RMK#___

f. Does each record include the date of acceptance? [3745-279-65(A)(6)] Yes ___ No ❑ N/A ___RMK#___

49. Are the records described in 3745-27 9-65(A) maintained for at least three years? [3745-279-65(B)] Yes ___ No ❑ N/A ___RMK#___

50. Prior to accepting the first shipment of off-spec used oil fuel from a generator, transporter, or processor/re-refiner, does the used oil fuel burner provide to the generator, transporter, or processor/re-refiner a one-time written and signed notice certifying that:

a. The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-27 9-66(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. The burner will burn the used oil only in an industrial furnace or boiler identified in 3745-279-61? Yes ___ No ❑ N/A ___RMK#___

51. Is the certification maintained for at least three years from the date the burner last received a shipment of off-spec used oil from the generator, transporter, or processor/re-refiner? [3745-279-66(B)] Yes ___ No ❑ N/A ___RMK#___

52. Does the used oil burner generate residues from the storage or burning of used oil? [3745-279-67] Yes___No___ N/A ___RMK#___

If so, are the residues managed as specified in 3745-279-10(E)? [3745-279-67] Yes ___ No ❑ N/A ___RMK#___

REMARKS

STANDARDS FOR USED OIL MARKETERS

53. Does the used oil fuel marketer initiate shipments of **off-spec** used oil only to a used oil burner that has an a U.S. EPA ID# and burns the used oil in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-71] Yes ___ No ❑ N/A ___RMK#___

54. Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil meets the specification for used oil fuel under 3745-279-11 keep copies of analyses of the used oil (or other information used to make the determination) for at least three years? [3745-279-72(B)] Yes ___ No ❑ N/A ___RMK#___

55. Has the used oil marketer notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-73(A)] Yes ___ No ❑ N/A ___RMK#___

56. Does the used oil marketer keep a record of each shipment of **off-spec** used oil directed to a used oil burner? [3745-279-74(A)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-74(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include the name and address of the burner who receives the oil? [3745-279-74(A)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-74(A)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include the U.S. EPA ID# of the burner? [3745-279-74(A)(4)] Yes ___ No ❑ N/A ___RMK#___

e. Does each record include the quantity of the used oil shipped? [3745-279-74(A)(5)] Yes ___ No ❑ N/A ___RMK#___

f. Does each record include the date of shipment? [3745-279-74(A)(6)] Yes ___ No ❑ N/A ___RMK#___

57. Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil **meets the fuel specifications** under 3745-279-11 keep a record of each shipment of used oil to an on-spec used oil burner? [3745-279-74(B)] Yes ___ No ❑ N/A ___RMK#___

a. Does each record include the name and address of the facility receiving the shipment? [3745-279-74(B)(1)] Yes ___ No ❑ N/A ___RMK#___

b. Does each record include quantity of used oil fuel delivered? [3745-279-74(B)(2)] Yes ___ No ❑ N/A ___RMK#___

c. Does each record include date of shipment or delivery? [3745-279-74(B)(3)] Yes ___ No ❑ N/A ___RMK#___

d. Does each record include a cross-reference to the record of used oil analysis or other information used to make the determination that the used oil meets the specification as required in 3745-279-72(A)? [3745-279-74(B)(4)] Yes ___ No ❑ N/A ___RMK#___

58. Are the records described in 3745-279-74(A) and (B) maintained for at least three years? [3745-279-74(C)] Yes ___ No ❑ N/A ___RMK#___

59. Before the used oil generator, transporter or processor/re-refiner directs the first shipment of **off-spec** used oil to a burner, does he obtain a one time written and signed notice from the burner certifying that:

a. The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-279-75(A)(1)] Yes ___ No ❑ N/A ___RMK#___

b. The burner will burn the off-spec used oil only in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-75(A)(2)] Yes ___ No ❑ N/A ___RMK#___

60. Is the certification maintained for at least three years from the date the last shipment of off-spec used oil was shipped to the burner? [3745-279-75(B)] Yes ___ No ❑ N/A ___RMK#___

C \Documents and Settings\ehendric\Desktop\MegaSet Rule Updates\USEDOIL.11 2004 fin.megaset.wpd

REMARKS

V. REGULATORY/ENFORCEMENT HISTORY:

As a result of violations of state and federal hazardous waste regulations found during the 1987 and 1988, OEPA RCRA inspections on August 31, 1989, USDOE and OEPA entered into a Consent Decree governing restoration of the environment at DOE-PORTS. This decree includes a requirement that DOE close the X-701B, X-749 X-231B, and X-616 units within specific timeframes. The X-749 and X-616 units have now been closed. X-231B is partially closed, and X-701B is yet to be closed.

On July 15, 1991, USDOE and OEPA signed Findings and Orders which provided DOE with an ORC Chapter 3734.02(G) exemption from permitting requirements for a portion of the Y-7725 Container Storage facility until the Part B permit is issued. This agreement also required that DOE close the X-752, X-744GR and X-744GU container storage units, and X-735 landfill cells 1 through 6 per closure plans required by the Order. These units have since been closed.

On May 18, 1993, USDOE-OEPA signed Findings and Orders which provided DOE with an exemption to the OAC rule 3745-58-50 which prohibits the on-site storage of LDR wastes for longer than one year. DOE, LMES and OEPA are currently negotiating a settlement over past violations.

A Part B permit was issued to DOE and its former operator, Lockheed Martin Energy Systems (LMES) for the X-7725 and X-326 storage facilities on August 21, 1995. The permit operator was transferred to DOE's current co-operator, Bechtel Jacobs, in 1998.

On October 4, 1995, DFFOs were signed which allowed DOE to store LDR wastes in excess of one year, so long as waste is being stored in compliance with the orders and an approved site treatment plan. These orders supercede the May 18, 1993 DFFOs.

On February 24, 1998, DOE, LMES and Ohio signed DFFO's and a Consent Order regarding past violations and the management of DUF6 and LiOH.

On March 18, 1999 DOE and Ohio EPA signed DFFO's. These DFFO's provide exemptions to DOE and integrate the following unclosed units into the CMS/CMI process: X-749, X-231B, X-701C, X-701B, X-230J7, and X-744Y.

Waste, Pesticides and Toxics Division

Type of Document:
- ☐ Notice of Violation and Inspection Report/Checklist
- ☒ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☐ Information Request

Facility Name : U.S. DOE-Portsmouth Gaseous Diffusion Plant

Facility Location: 3930 U.S. Route 23 South

City: Piketon **State:** Ohio

U.S. EPA ID# OH7 890 008 983

Assigned Staff W. Francis **Phone:** 3-4921

Name	Signature	Date
W. Francis Author	Walt	8/14/02
Regional Counsel		
M. Beedle Acting Section Chief	for M. Beedle	8-26-02

Directions/Request for Clerical Support:

After the Section Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file copy.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.

   7099 3400 0000 9596 1088

   Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

Is the State Handling the Violation for the Inspection Mike

XOS! Walt

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ms. Sharon Robinson
U.S. Dept of Energy
Portsmouth Site Office
Post Office Box 700
Piketon, Ohio 45661-0700

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* | B. Date of Delivery 9-20-01

C. Signature

X [signature] ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

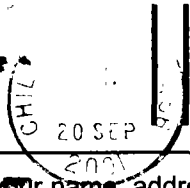
3. Service Type
- ☐ Certified Mail
- ☐ Express Mail
- ☐ Registered
- ☐ Return Receipt for Merchandise
- ☐ Insured Mail
- ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Copy from service label)*
7099 3400 0000 9588 7630 / DE-9J W FRANCIS ECAB

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY - FRANCIS, WALT
REGION 5 - DE-9J - ECAB SECT. 1
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604

Waste, Pesticides and Toxics Division

Type of Document:
- ☐ Notice of Violation and Inspection Report/Checklist
- ☒ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☐ Information Request

Facility Name : U.S. DOE-Portsmouth Gaseous Diffusion Plant

Facility Location: 3930 U.S. Route 23 South

City: Piketon **State:** Ohio

U.S. EPA ID# OH7 890 008 983

Assigned Staff W. Francis **Phone:** 3-4921

Name	Signature	Date
W. Francis Author	Walt	8/14/02
Regional Counsel		
M. Beedle Acting Section Chief	for M. Beedle	8-26-02

Directions/Request for Clerical Support:

After the Section Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file copy.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
   7099 3400 0000 9596 1088
   Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

Is the State Handling the Violation for the Inspection Mike

XOS! Walt

MAY 09 2001

DE-9J

CERTIFIED MAIL 9596 7875
RETURN RECEIPT REQUESTED

Ms. Sharon J. Robinson
Site Manager
United States Department of Energy
Portsmouth Site Office
P.O. Box 700
Piketon, Ohio 45661-0700

Re: Letter of Acknowledgment
United States Department of Energy
Portsmouth Gaseous Diffusion Plant
OH7 890 008 983

Dear Ms. Robinson:

On February 6, 2001, the United States Environmental Protection Agency (U.S. EPA) issued the U.S. Department of Energy (U.S. DOE)-Portsmouth Gaseous Diffusion Plant, near Piketon, Ohio facility a Notice of Violation (NOV) which identified violations of the Ohio Administrative Code (OAC) as follows: failure to mark with the words "Hazardous Waste" or other words that identify the contents of a 55-gallon container of hazardous waste in Building X-623; and failure to complete box I on the hazardous waste manifest form for F001 and F003 hazardous wastes from Building X-701B. U.S. EPA received your March 20, 2001, response to the February 6, 2001, NOV.

This letter is to inform you that U.S. EPA has reviewed your responses and determined that additional enforcement action need not be taken at this time.

This position does not limit your liability for compliance with all the applicable provisions of the RCRA, as amended. Your hazardous waste management operations will continue to be evaluated by U.S. EPA and the Ohio Environmental Protection Agency (OEPA) in the future.

In your March 20, 2001, response letter, you stated that the 55-gallon container in Building X-623 was not being managed as a satellite accumulation container but was actually a "tank" that is part of an NPDES treatment process. The Ohio Administrative Code (OAC) at 3745-54-01(G)(5) specifies that the requirements of

Chapters 3745-54 to 3745-57 of the OAC do not apply to the owner or operator of an elementary neutralization unit or a wastewater treatment unit as defined in rule 3745-50-10 of the OAC. The exemption from the RCRA requirements only covers a tank which treats or stores the incoming hazardous wastewater or hazardous wastewater treatment sludge, and does not follow or attach to the outgoing hazardous waste storage. Furthermore, the OAC at 3745-50-10(101) defines a tank as a stationary device designed to contain an accumulation of hazardous waste, which is constructed primarily of non-earthen materials that provide structural support. A container is defined in the OAC at 3745-50-10(17) and means any portable device in which a material is stored, transported, treated, disposed of, or otherwise handled. Also, if U.S. DOE takes the position that the 55-gallon container in Building X-623 that is connected to the contaminated groundwater air stripping unit is a tank, then the applicable OAC RCRA tank requirements would apply such as: secondary containment when the tank reaches 15 years of age; written assessment attesting to the design, installation and structural integrity of the system; overfill protection; RCRA 40 CFR Part 265 Subpart BB and CC requirements; and RCRA closure requirements. Furthermore, if U.S. DOE demonstrates that there are contaminated soils at the tank system accumulation unit that cannot be practicably removed or decontaminated at closure, then U.S. DOE must RCRA close the tank system and perform post-closure care in accordance with the closure and post-closure requirements that apply to landfills. We recommend that U.S. DOE Portsmouth personnel label the 55-gallon container "Hazardous Waste" or "Waste Trichloroethylene" and identify it as a hazardous waste satellite accumulation area.

If you have any questions regarding this letter, please contact Walt Francis of my staff at (312)353-4921.

Sincerely yours,

Michael Cunningham, Acting Chief
Compliance Section #2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

cc: Melody Stewart, OEPA-SE District Office

bcc: John Gierczak, U.S. EPA-Cleveland Office
Monesh Chabria, ORC (C-14J)

OFFICIAL FILE COPY

OFFICIAL FILE COPY

ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY
AUTHOR/ TYPIST	COMPLIANCE SECTION 1 SECTION CHIEF	COMPLIANCE SECTION 2 SECTION CHIEF	CA SECTION SECTION CHIEF	ECAB BRANCH CHIEF	WPTD DIVISION DIRECTOR
W.F. 5/9/01		5.9.01			

SEP 14 2001

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Sharon Robinson
U.S. Department of Energy
Portsmouth Site Office
Post Office Box 700
Piketon, Ohio 45661-0700

Mr. John Harmon
Bechtel Jacobs Company LLC
3939 US Route 23 South
Piketon, Ohio 45661

Re: RCRA Compliance Evaluation Inspection
U.S. Department of Energy - Portsmouth
Gaseous Diffusion Plant
Piketon, Ohio
OH7 890 008 983

Dear Ms. Robinson and Mr. Harmon:

On August 6 and 7, 2001, your installation located in Piketon, Ohio, was inspected by United States Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) representatives. The purpose of the inspection was to evaluate compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, transportation, and storage of hazardous waste.

U.S. EPA did receive a copy of the August 20, 2001, notice of violation/notice of compliance letter sent to you from the OEPA, regarding the August 6 and 7, 2001, inspection. We also received a copy of your August 8, 2001, fax to OEPA and U.S. EPA regarding annual hazardous waste training documentation.

As of this writing, our review of the inspection has not resulted in the detection of violations of any of the 40 CFR Part 264 Subpart CC (Air Emission Standards for Containers) RCRA requirements.

However, during the above referenced August 2001 inspection of

Building X-7725, the inspectors observed approximately 2,300 55-gallon containers that were stored outside of Building X-7725. The 55-gallon containers were in a roped off area, and marked as containing radioactive materials. However, many of the 55-gallon containers were of questionable integrity. During the inspection close-out meeting we discussed these 55-gallon containers. It is U.S. EPA's understanding that OEPA was scheduled to perform a follow-up inspection on September 10, 2001, to re-inspect the rusty 55-gallon containers that are stored outside of Building X-7725. Please keep U.S. EPA informed as to the disposition of these containers and any conclusions regarding their mixed-waste status.

This determination does not limit the applicability of either the requirements examined or other RCRA regulations. Your installation will continue to be evaluated by U.S. EPA and the OEPA in the future.

If you have any questions regarding this letter, please contact Walt Francis of my staff at (312)353-4921.

Sincerely yours,

Paul Little, Chief
Compliance Section #2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

cc: Melody Stewart, OEPA-Southeast District Office

OFFICIAL FILE COPY

ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY
		9-17-01 PB			
AUTHOR/ TYPIST	SECTION #1 CHIEF	SECTION #2 CHIEF	CORRECTIVE ACTION SECTION CHIEF	ECAB BRANCH CHIEF	WPTD DIVISION DIRECTOR
W.F. 9/11/2001					

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 09 2001

REPLY TO THE ATTENTION OF DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Sharon J. Robinson
Site Manager
United States Department of Energy
Portsmouth Site Office
P.O. Box 700
Piketon, Ohio 45661-0700

Re: Letter of Acknowledgment
United States Department of Energy
Portsmouth Gaseous Diffusion Plant
OH7 890 008 983

Dear Ms. Robinson:

On February 6, 2001, the United States Environmental Protection Agency (U.S. EPA) issued the U.S. Department of Energy (U.S. DOE)-Portsmouth Gaseous Diffusion Plant, near Piketon, Ohio facility a Notice of Violation (NOV) which identified violations of the Ohio Administrative Code (OAC) as follows: failure to mark with the words "Hazardous Waste" or other words that identify the contents of a 55-gallon container of hazardous waste in Building X-623; and failure to complete box I on the hazardous waste manifest form for F001 and F003 hazardous wastes from Building X-701B. U.S. EPA received your March 20, 2001, response to the February 6, 2001, NOV.

This letter is to inform you that U.S. EPA has reviewed your responses and determined that additional enforcement action need not be taken at this time.

This position does not limit your liability for compliance with all the applicable provisions of the RCRA, as amended. Your hazardous waste management operations will continue to be evaluated by U.S. EPA and the Ohio Environmental Protection Agency (OEPA) in the future.

In your March 20, 2001, response letter, you stated that the 55-gallon container in Building X-623 was not being managed as a satellite accumulation container but was actually a "tank" that is part of an NPDES treatment process. The Ohio Administrative Code (OAC) at 3745-54-01(G)(5) specifies that the requirements of

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 50% Recycled Paper (20% Postconsumer)

Chapters 3745-54 to 3745-57 of the OAC do not apply to the owner or operator of an elementary neutralization unit or a wastewater treatment unit as defined in rule 3745-50-10 of the OAC. The exemption from the RCRA requirements only covers a tank which treats or stores the incoming hazardous wastewater or hazardous wastewater treatment sludge, and does not follow or attach to the outgoing hazardous waste storage. Furthermore, the OAC at 3745-50-10(101) defines a tank as a stationary device designed to contain an accumulation of hazardous waste, which is constructed primarily of non-earthen materials that provide structural support. A container is defined in the OAC at 3745-50-10(17) and means any portable device in which a material is stored, transported, treated, disposed of, or otherwise handled. Also, if U.S. DOE takes the position that the 55-gallon container in Building X-623 that is connected to the contaminated groundwater air stripping unit is a tank, then the applicable OAC RCRA tank requirements would apply such as: secondary containment when the tank reaches 15 years of age; written assessment attesting to the design, installation and structural integrity of the system; overfill protection; RCRA 40 CFR Part 265 Subpart BB and CC requirements; and RCRA closure requirements. Furthermore, if U.S. DOE demonstrates that there are contaminated soils at the tank system accumulation unit that cannot be practicably removed or decontaminated at closure, then U.S. DOE must RCRA close the tank system and perform post-closure care in accordance with the closure and post-closure requirements that apply to landfills. We recommend that U.S. DOE Portsmouth personnel label the 55-gallon container "Hazardous Waste" or "Waste Trichloroethylene" and identify it as a hazardous waste satellite accumulation area.

If you have any questions regarding this letter, please contact Walt Francis of my staff at (312)353-4921.

Sincerely yours,

Michael Cunningham, Acting Chief
Compliance Section #2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

cc: Melody Stewart, OEPA-SE District Office

Department of Energy
Portsmouth Site Office
P.O. Box 700
Piketon, Ohio 45661-0700
Phone: 740-897-5010

March 20, 2001
UE-54-9964

Mr. John S. Gierczak
United States Environmental Protection Agency
Region V
Cleveland Office
25089 Center Ridge Road
Westlake, Ohio 44145-4170

Ms. Beverly J. Kush, Chief
United States Environmental Protection Agency
Region V
Oil Planning and Response Section
77 West Jackson Boulevard
Mail Code SE-5J
Chicago, Illinois 60604-3590

Mr. Paul Little, Chief
United States Environmental Protection Agency
Region V
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division
77 West Jackson Boulevard
Mail Code SE-5J
Chicago, Illinois 60604-3590

Dear Madame and Sirs:

NOTICE OF VIOLATION AND LETTER OF DEFICIENCY, MULTIMEDIA INSPECTION, PORTSMOUTH GASEOUS DIFFUSION PLANT OH7 890 008 983

Please find enclosed responses to the Notice of Violation arising from the inspection conducted June 19 through June 23, 2000, by the United States Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA).

In response to the Letter Of Deficiency for the Spill Prevention, Control and Countermeasure Plan, DOE is coordinating review of the Plan with the United States Enrichment Corporation (USEC). See the USEC letter to Robert G. Murphy, U.S. EPA, dated March 19, 2001, provided in Enclosure A.

If you need additional information please contact Melda Rafferty of my staff at (740) 897-5521.

Sincerely,

Sharon J. Robinson
Site Manager
Portsmouth Site Office

Enclosure

cc w/enclosure:
Melody Stewart, OEPA/Logan
Dennis Deavers, OEPA/Logan
Administrative Records

cc w/enclosure:
Jim King, BJC/PORTS

Response to Notice of Violation
RCRA Compliance Inspection
United States Department of Energy –
Portsmouth Gaseous Diffusion Plant
OH7 890 008 983

A. Violations

1. *Rule 3745-52-34(C) (1) (b) specifies that a generator may accumulate as much as fifty-five gallons of hazardous waste or one quart of acutely hazardous waste in containers at or near any point of generation where wastes initially accumulate, provided that: the containers are marked either with the words "Hazardous Waste" or with other words that identify the contents of the containers. During the inspection of Building X-623 at the Air Stripper, the inspectors observed a container of recovered TCE which was not labeled as "Hazardous Waste" or "Recovered TCE Solvent Waste". The inspectors were told by U.S. DOE personnel that this was a satellite accumulation area, and when the container is full, is moved to a less than 90 day accumulation area. U.S. DOE should label this container as containing "Hazardous Waste" or "Recovered TCE Solvent Waste".*

Response

The area noted by the inspector was not being managed as a satellite accumulation area. The container identified by the inspector is not a "portable device" and is actually a tank that is part of the NPDES treatment process. As noted in the photographs provided to the inspector at the time, although not required, the tank is labeled trichloroethylene.

2. *Rule 3745-52-20(A) requires that a generator who transports, or offers for transportation, hazardous waste for off-site treatment, storage, or disposal shall prepare a uniform hazardous waste manifest, U.S. EPA form 8700-22. Section 3745-52-20(B) specifies that completion of item I, which relates to the U.S. EPA hazardous waste number, is required. During the record review portion of the inspection, the inspectors reviewed approximately 50 1999 hazardous waste manifests from the sludge from Building X-701B, and found that U.S. DOE had not placed the hazardous waste codes F001 and F003 in box I of U.S. EPA's Hazardous Waste Manifest (U.S. EPA form 8700-22). However, the inspectors found that in one instance from 2/16/99, the hazardous waste manifest form was completed correctly. U.S. DOE should make sure that box I of the U.S. EPA manifest form is completed correctly, prior to any off-site shipments.*

Response

As noted by the inspectors, all 1999 and 2000 manifest forms reviewed (other than the 49 manifest forms for X-701B) had been completed correctly. Please note that on the 49 forms the waste codes were noted in Section 11 A of the manifest form.

B. Areas of Concern

1. *U.S. DOE was not placing hazardous waste codes on containers in the less than 90 day accumulation areas (this was observed throughout the plant). While not required in the OAC, U.S. DOE was placing an internal tracking number on each container. The inspectors concern is that procedures be in place to correctly identify the alpha numeric U.S. EPA hazardous waste code from the internal tracking number when hazardous waste is shipped off-site.*

Response

Comment noted

2. *The inspectors reviewed the annual RCRA refresher course training records as required by OAC Rule 3745-54-16(D). The inspectors found the training records for each employee to be confusing because of different course numbers each year. It is our understanding that U.S. DOE contracts with United States Enrichment Corporation (USEC) for maintaining the training records. U.S. EPA and OEPA found similar problems with the USEC employees training records.*

Response

Comment noted. In the fall of 2000, the RCRA refresher training program was restructured in order to eliminate the confusion with the training records.

3. *During the inspection, the inspectors were unable to verify if U.S. DOE was complying the OEPA Director's Findings and Orders of February 28, 1998, for the storage of lithium hydroxide (LiOH) and depleted uranium hexafluoride (DUF). The OEPA Order allows for the storage of depleted uranium hexafluoride for a period of 10 years. However, certain record-keeping requirements must be met for Buildings X-744T, U, S, K, N, P, and Q:*

    1. *A visual inspection of each LiOH warehouse on afternoon and evening shifts each Monday through Friday;*

    2. *Monthly inspections of the accessible portions of the interior of each warehouse;*

    3. *Storage of shipping containers shall not exceed 120 days in the staging area;*

    4. *The staging area shall be covered with a protective covering, all drums shall be covered with a waterproof covering;*

    5. *The Contingency Plan shall be implemented in response to an emergency involving LiOH; and*

    6. *In addition, training is required for personnel involved in inspections and management of the LiOH.*

    In addition, the DUF Management Plan specifies that:

1. *Inspections are to be completed of the DUF cylinders at least every four (4) years;*

2. *After the DUF cylinders have been restacked in FY 1999, 150 cylinders shall be inspected on an annual basis;*

3. *Ultrasonic Thickness Testing – Shall be completed on 10 percent of the cylinders moved during fiscal years 1996, 1997, and 1998 (about 500 cylinders shall be ultra thickness measured);*

4. *All DUF cylinders and storage yards shall be radiologically surveyed annually to ensure that no area of the yards exceeds 5 mr/hr; and*

5. *DUF cylinder maintenance program which involves renewing that protective coating of cylinders as necessary to avoid excessive corrosion.*

Please provide to USEPA copies of records that document that LIOH and depleted DUF Management Plans are being implemented pursuant to the 1998 OEPA Order.

Response

US DOE is complying with the requirements of the Ohio Director's Final Findings and Orders. As was agreed during the conference call on March 14, 2001 between Melda Rafferty, DOE; Walt Francis, USEPA; and Rosemary Richmond, BJC; the following documentation is being provided in Enclosure B:

- Weekly LiOH inspections for December 2000 and January 2001
- Monthly LiOH inspections for December 2000 and January 2001
- Example training documentation
- Two DUF6 cylinder inspections (printouts from onsite database tracking systems)
- Two DUF6 ultrasonic thickness tests
- One DUF6 radiological cylinder and storage yard survey

In addition, the following information should be noted:

- All LiOH was moved from Warehouse K in August 1997. Therefore, inspections for Warehouse K are no longer required.
- DUF6 cylinder skirt protective coating was completed summer of 1998
- Staging areas for LiOH have not been utilized since August 1997
- The LiOH Contingency Plan has never been implemented
- DOE sold the LiOH and all material is scheduled to be removed from the site by late spring/early summer 2001

Enclosure A

Applicability of the Substantial Harm Criteria

Facility Name: Portsmouth Gaseous Diffusion Plant
Facility Address: 3930 U.S. Route 23 South, P.O. Box 628, Piketon, Ohio 45661

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oi storage capacity greater than or equal to 42,000 gallons?

   Yes _____ No ✓

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

   Yes _____ No ✓

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula \1\) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to this part, section 10, for availability) and the applicable Area Contingency Plan.

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula \1\) such that a discharge from the facility would shut down a public drinking water intake \2\?

\1\ If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

\2\ For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).

   Yes _____ No ✓

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

   Yes _____ No ✓

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

☐ Paul McGoron
Signature

☐ PAUL McGORON
Name (please type or print)

☐ ENVIRONMENTAL ENGINEER
Title

☐ 11/16/98
Date

Following is a conservative calculation of the planning distance an oil spill at PORTS could impact in accordance with 40 CFR 112 guidance for FRP development.
The calculation below is based on an oil spill traveling the Scioto River itself from PORTS to the Ohio River at Portsmouth without taking credit for any of the various tributary creeks between PORTS and the Scioto River.

The planning distance, d, is calculated as:

d = v * t * c, where
v = river velocity in ft/sec
t = time interval = 27 as specified in Table 3
c = conversion constant = 0.68 sec* mile / hr*ft

v = 1.5/n * r^(2/3) * (1/2), where
n = Manning Roughness Coefficient from Table 1 = 0.05 for the Scioto River
r = hydraulic radius, in feet = average mid channel depth, in feet, times 0.667
s = average slope of the river, unitless

As per the ODOT, mid channel river bed at Portsmouth is 474.9 ft. AMSL
As per the ODOT, average river level at Portsmouth is 485 ft. AMSL
River bed data is unavailable above Portsmouth therefor the Portsmouth data will be used as an upper bounding value.

Therefore:

$$r < (485 - 474.9) * 0.667 < 6.74$$

As per USGS Topo maps, average river level opposite PORTS is 531 ft. AMSL
As per maps, the distance between PORTS and Portsmouth is 20 miles along the Scioto River and as per USGS Topo map (Lucasville quadrant) the Scioto River meanders over approximately 1.6 miles per straight mile traveled. This would indicate 32.5 miles between PORTS and Portsmouth.

Therefore:

$$s = (531\text{-}485) \text{ ft} / 32.5 \text{ miles} * 1 \text{ mile} / 5280 \text{ ft} = 0.000262$$

Therefore:

$$v < 1.5 / 0.05 * 6.74 \text{ ^ } 2/3 * 0.000262 \text{ ^ } 1/2$$
$$30 \qquad 3.57 \qquad 0.016 \qquad < 1.73 \text{ ft/sec}$$

and

$$d < 1.73 \text{ ft/sec} * 27 \text{ hr} * 0.68 < 31.8 \text{ miles}$$

The above calculations indicate that the planning distance for a worst case oil spill is limited to the Scioto River between PORTS and the Ohio River at Portsmouth. There are no public drinking water system intakes or designated environmentally sensitive areas within this area.

Enclosure B

LiOH Project Weekly Field Inspection checklist (Approved 8/28/97)	Yes	No	N/A
X-744N:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744P:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744Q:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744S:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744T:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744U:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		

Comments: Doors to the X-744S, X-744T, X-744U warehouses were open, workers were loading trucks for shipment.

Signature: Brian Pyles **Date:** 12/06/00

Time: 1000

LiOH Project Weekly Field Inspection checklist (Approved 8/28/97)	Yes	No	N/A
X-744N:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744P:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744Q:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744S:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744T:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744U:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		

Comments: Doors to the X-744S, X-744T, X-744U warehouses were open, workers were loading trucks for shipment.

Signature: Brian Pyles **Date:** 01/10/01

Time: 1245

LiOH Project Weekly Field Inspection checklist (Approved 8/28/97)	Yes	No	N/A
X-744N:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744P:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744Q:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744S:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744T:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744U:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		

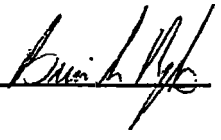
Comments: Doors to the X-744S, X-744T, X-744U warehouses were open, workers were loading trucks for shipment.

Signature: Brian Pyles **Date:** 12/13/00

Time: 1345

LiOH Project Weekly Field Inspection checklist (Approved 8/28/97)	Yes	No	N/A
X-744N:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744P:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744Q:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744S:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744T:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744U:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		

Comments: Doors to the X-744S, X-744T, X-744U warehouses were open, workers were loading trucks for shipment.

Signature: Brian Pyles  **Date:** 01/31/01

Time: 1040

LiOH Project Weekly Field Inspection checklist (Approved 8/28/97)	Yes	No	N/A
X-744N:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744P:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744Q:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744S:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744T:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744U:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		

Comments: Doors to the X-744S, X-744T, X-744U warehouses were open, workers were loading trucks for shipment.

Signature: Brian Pyles **Date:** 01/24/01

Time: 1000

LiOH Project Weekly Field Inspection checklist (Approved 8/28/97)	Yes	No	N/A
X-744N:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744P:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744Q:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744S:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744T:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744U:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		

Comments: Doors to the X-744S, X-744T, X-744U warehouses were open, workers were loading trucks for shipment.

Signature: Jeremy Galloway **Date:** 01/17/01

Time: 1230

LiOH Project Weekly Field Inspection checklist (Approved 8/28/97)	Yes	No	N/A
X-744N:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744P:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744Q:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744S:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744T:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744U:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		

Comments: Doors to the X-744S, X-744T, X-744U warehouses were open, workers were loading trucks for shipment.

Signature: Brian Pyles **Date:** 01/03/01

Time: 1230

LiOH Project Weekly Field Inspection checklist (Approved 8/28/97)	Yes	No	N/A
X-744N:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744P:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744Q:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744S:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744T:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744U:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		

Comments: Doors to the X-744S, X-744T, X-744U warehouses were open, workers were loading trucks for shipment.

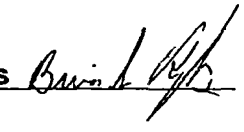
Signature: Marc Sheridan

Date: 12/27/00

Time: 1500

LiOH Project Weekly Field Inspection checklist (Approved 8/28/97)	Yes	No	N/A
X-744N:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744P:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744Q:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744S:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744T:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		
X-744U:			
Access doors to the warehouse have not been compromised?	X		
Are fire extinguishers in place?	X		

Comments: Doors to the X-744S, X-744T, X-744U warehouses were open, workers were loading trucks for shipment.

Signature: Brian Pyles  **Date:** 12/20/00

Time: 1230

LiOH Project Monthly Field Inspection Checklist	Yes	No	N/A
X-744N;			
Integrity of accessible drums has not been compromised?	X		
Warehouse roof is not leaking?	X		
Warehouse generally in good condition?	X		
Spill control equipment available?	X		
"Danger - Unauthorized Personnel Keep Out" signs are at each entrance and legible from 25 feet?	X		
X-744P;			
Integrity of accessible drums has not been compromised?	X		
Warehouse roof is not leaking?	X		
Warehouse generally in good condition?	X		
Spill control equipment available?	X		
"Danger - Unauthorized Personnel Keep Out" signs are at each entrance and legible from 25 feet?	X		
X-744Q;			
Integrity of accessible drums has not been compromised?	X[1]		
Warehouse roof is not leaking?		X[3]	
Warehouse generally in good condition?	X[2]		
Spill control equipment available?	X		
"Danger - Unauthorized Personnel Keep Out" signs are at each entrance and legible from 25 feet?	X		
X-744S;			
Integrity of accessible drums has not been compromised?	X		
Warehouse roof is not leaking?	X		
Warehouse generally in good condition?	X		
Spill control equipment available?	X		
"Danger - Unauthorized Personnel Keep Out" signs are at each entrance and legible from 25 feet?	X		

Comments:

[1]One drum in X744Q was found with ring detached. It is located on bottom row; several drums would have to be moved to fix ring. No immediate hazards are present but drum will be monitored for any changes.

[2]One of the wood support beams in X-744Q is broken and another beam was cracked. There does not appear to be any structure damage to hurt the integrity of the building.

[3] Skylight in X744Q warehouse is damaged. It is located on the southwest corner of the building. It has left large hole in roof.

LiOH Project Monthly Field Inspection Checklist	Yes	No	N/A
X-744T;			
Integrity of accessible drums has not been compromised?	X		
Warehouse roof is not leaking?		X[4]	
Warehouse generally in good condition?	X		
Spill control equipment available?	X		
"Danger - Unauthorized Personnel Keep Out" signs are at each entrance and legible from 25 feet?	X		
X-744U:			
Integrity of accessible drums has not been compromised?	X		
Warehouse roof is not leaking?	X		
Warehouse generally in good condition?	X		
Spill control equipment available?	X		
"Danger - Unauthorized Personnel Keep Out" signs are at each entrance and legible from 25 feet?	X		

Comments:

[4] **The roof of the X-744T warehouse is leaking near the center of the building.**

Date and Time of Inspection:

Signature: Brian Pyles **Date:** 01/12/01

Time: 0900

LiOH Project Monthly Field Inspection Checklist	Yes	No	N/A
X-744N;			
Integrity of accessible drums has not been compromised?	X		
Warehouse roof is not leaking?	X		
Warehouse generally in good condition?	X		
Spill control equipment available?	X		
"Danger - Unauthorized Personnel Keep Out" signs are at each entrance and legible from 25 feet?	X		
X-744P;			
Integrity of accessible drums has not been compromised?	X		
Warehouse roof is not leaking?	X		
Warehouse generally in good condition?	X		
Spill control equipment available?	X		
"Danger - Unauthorized Personnel Keep Out" signs are at each entrance and legible from 25 feet?	X		
X-744Q;			
Integrity of accessible drums has not been compromised?	X[1]		
Warehouse roof is not leaking?		X[3]	
Warehouse generally in good condition?	X[2]		
Spill control equipment available?	X		
"Danger - Unauthorized Personnel Keep Out" signs are at each entrance and legible from 25 feet?	X		
X-744S;			
Integrity of accessible drums has not been compromised?	X		
Warehouse roof is not leaking?	X		
Warehouse generally in good condition?	X		
Spill control equipment available?	X		
"Danger - Unauthorized Personnel Keep Out" signs are at each entrance and legible from 25 feet?	X		

Comments:

[1]One drum in X744Q was found with ring detached. It is located on bottom row; several drums would have to be moved to fix ring. No immediate hazards are present but drum will be monitored for any changes.

[2]One of the wood support beams in X-744Q is broken and another beam was cracked. There does not appear to be any structure damage to hurt the integrity of the building.

[3] Skylight in X744Q warehouse is damaged. It is located on the southwest corner of the building. It has left large hole in roof.

LiOH Project Monthly Field Inspection Checklist	Yes	No	N/A
X-744T;			
Integrity of accessible drums has not been compromised?	X		
Warehouse roof is not leaking?		X[4]	
Warehouse generally in good condition?	X		
Spill control equipment available?	X		
"Danger - Unauthorized Personnel Keep Out" signs are at each entrance and legible from 25 feet?	X		
X-744U:			
Integrity of accessible drums has not been compromised?	X		
Warehouse roof is not leaking?		X[5]	
Warehouse generally in good condition?	X		
Spill control equipment available?	X		
"Danger - Unauthorized Personnel Keep Out" signs are at each entrance and legible from 25 feet?	X		

Comments:

[4] The roof of the X-744T warehouse is leaking near the center of the building.

[5] The roof of the X-744U warehouse is leaking. Drain pipe located at center of building towards the south end of building has been broken off and rain water is draining inside building.

Date and Time of Inspection:

Signature: Brian Pyles

Date: 12/14/00

Time: 1415

A-124 Rev.

ATTENDANCE SHEET

Module Number and Title: Removal of Lithium TMIS #

Building/Room: X-744T Lithium Xhse. Training Date: 1/14/98 Military Time:

Instructor Name/Badge Number:

Badge Number	*Social Security Number (Non-Site)	Grade	Printed Name	Signature	Company/Dept.	Charge Number
*** DO NOT USE PENCIL - USE BLACK INK *** DO NOT USE PENCIL - USE BLACK INK ***						
			Brian Hoover	Brian Hoover		
			Charles Jacks	Charles Jacks		
			Barry Black	Barry Black		

*Social Security Number is voluntary, but is necessary for the tracking of training records for non-site personnel.

Rc D-225 (08 T78 A74)

A-1241 (2- Rev.

ATTENDANCE SHEET

Modu.. ..umber and Title: Li OH Shipment Project Training: Inspection/Management TMIS #

Building/Room: Training Date: * see left margin of form Military Time:

Instructor Name/Badge Number: Cliff Beeks / 60342

Badge Number	*Social Security Number (Non-Site)	Grade	Printed Name	Signature	Company/Dept.	Charge Number
*.	*** DO NOT USE PENCIL - USE BLACK INK *** DO NOT USE PENCIL - USE BLACK INK ***					
2/10/97 57526			Sandra Pollard	Sandra L. Pollard	LMES/1127	
3/6/97 56734			Mike Meeker	Mike Meeker	LMES/1127	
3/7/97 56474			Roger Williams	Roger Williams	LMES/1135	

RECEIVED

MAR 11 1997

ENVIRONMENTAL COMPLIANCE

*Social Security Number is voluntary, but is necessary for the tracking of training records for non-site personnel.

A-1241 (2-92) Rev.

ATTENDANCE SHEET

Mo umber and Title: LiOH Shipment Project Training - Revised Inspection Checklists TMIS #

Building/Room: Training Date: Military Time:

Instructor Name/Badge Number: Cliff Beeks - 60342

Date	Badge Number	*Social Security Number (Non-Site)	Grade	Printed Name	Signature	Company/Dept.	Charge Number
	*** DO NOT USE PENCIL - USE BLACK INK *** DO NOT USE PENCIL - USE BLACK INK ***						
6/4/97	56474			Roger Williams	Roger Williams	1179 LMES	
6/4/97	56736			MIKE MEEKER	Mike Meeker	1127/LMES	
6/13/97	57526			Sandra Pollard	Sandra Pollard	1127/LMES	

*Social Security Number is voluntary, but is necessary for the tracking of training records for non-site personnel.

DOE 48-Inch Diameter UF6 Cylinder Inspection Checksheet
Procedure Reference: FS-2430 Rev 1

1. Site: PORT **4. Inspected by:** 56335 KAREN SMALLEY **Date:** 03-14-2001

2. Type: Quadrennial **Inspected by:** 59952 TOM BENNINGTON **Date:** 03-14-200

3. Location: Y X-745-C S 007 R 005 P 052 T/B B **5. Cylinder Serial #:** 145409

6. Size: 10T **7. Model:** 48G **8. Name Plate Data: Water Cap** 0 **LB ; Tare Wt** 0 **LB**

Mechanical Integrity			Mechanical Integrity		
(A) Defect	**(B)**	**(C) Size/Comment**	**(A) Defect**	**(B)**	**(C) Size/Comment**
A01 - Hole In Cylinder/Evidence of Visible Leakage/Contamination/Reaction Products		Length: Width: Leakage:	A10 - Heavy Rust Scale on Cylinder Over 1/8" Thick and Over 2" in Diameter		Length: Width:
A03 - Bulge 1/2" or More		Height: Length: Width:	A11 - Stacking of Incompatible Cylinders		
A04 - Gouge or Cut Over 1/16" Deep		Depth: Length: Width:	A12 - Longitudinal Weld at 6:00 Position		
A05 - Dent Over 1/16" Deep		Depth: Length: Width:	A13 - Crack in Cylinder Wall		Depth: Length: Width:
A06 - Stiffening Ring Condition Unacceptable			A16 - Lifting Lug Defective		
A07 - Lugs Misaligned > 10 Degrees			A17 - Wide Channel Stiffening Ring Rusted Out		
A09 - Severe Pitting Corrosion		Length: Width:			

Cylinder Body			Valve End of Cylinder		
(A) Defect	(B)	(C) Size/Comment	(A) Defect	(B)	(C) Size/Comment
B01 - Cylinder Shell Body in Ground Contact		Depth: Section:	C01 - Evidence of Leakage/Contamination on Valve		
B03 - Cylinder in Standing Water or Evidence of Water/Cylinder Contact			C02 - Bent Valve Body		
B05 - Lifting Lug Contact		Serial Number of Other Cylinder:	C03 - Bent or Separated Skirt		
B06 - Improper Upper Tier Cylinder Support			C04 - Rust/Scale in Skirt or Weep Hole in Skirt is Plugged		Depth:
B07 - Wood Saddles/Resting Block in Use			C05 - Skirt in Ground Contact		
B08 - Concrete Saddle Defective	Y	Cracking; Chipping	C06 - Weep Hole in Skirt Nonexistent or Misaligned		
B09 - Saddle Missing			C08 - Valve End Not Accessible		
B10 - Debris Between Saddle and Cylinder			C10 - Packing Nut Missing or Cracked		
B11 - Rust Bloom on Painted Cylinder		Length: Width:	C12 - Port Cap Missing or Cracked		
B12 - Coating System Failure			C13 - Valve Stem Defective		
B13 - Complete Coating System Failure			C14 - Plug in Place of Valve		
B14 - Stiffening Ring in Ground Contact			C15 - Valve Protector Cracked, Bent or Weld Cracked		

5. Cylinder Serial # 145409

Valve End of Cylinder					
(A) Defect	**(B)**	**(C) Size/Comment**			
C16 - ID Plate Missing/Off/Illegible					
C17 - ID Plate Loose/Cracked Weld					
C18 - New ID Tag		Serial Number of Other Cylinder:			
C21 - Nonstandard Valve					
Plug End of Cylinder					
D01 - Evidence of Leakage/Contamination on Plug					
D02 - Missing or Bent or Damaged Plug					
D03 - Bent or Separated Skirt					
D04 - Rust/Scale in Skirt or Weep Hole in Skirt is Plugged					
D05 - Skirt in Ground Contact					
D06 - Weep Hole in Skirt Nonexistent or Misaligned					
D08 - Plug End Not Accessible					
D10 - Rusted Plug					
D11 - Plug Sealed or Welded					
5. Cylinder Serial # 145409					

DOE 48-Inch Diameter UF6 Cylinder Inspection Checksheet
Procedure Reference: FS-2430 Rev 1

1. Site: PORT **4. Inspected by:** 56875 PAT SPRIGGS **Date:** 05-12-1997

2. Type: Pre-Relocation **Inspected by:** **Date:** 05-12-1997

3. Location: Y ____ S __ R __ P __ T/B __ **5. Cylinder Serial #:** 145409

6. Size: 10T **7. Model:** 48G **8. Name Plate Data: Water Cap** 0 **LB ; Tare Wt** 0 **LB**

Mechanical Integrity			Mechanical Integrity		
(A) Defect	**(B)**	**(C) Size/Comment**	**(A) Defect**	**(B)**	**(C) Size/Comment**
A01 - Hole In Cylinder/Evidence of Visible Leakage/Contamination/Reaction Products		Length: Width: Leakage:	A10 - Heavy Rust Scale on Cylinder Over 1/8" Thick and Over 2" in Diameter		Length: Width:
A03 - Bulge 1/2" or More		Height: Length: Width:	A11 - Stacking of Incompatible Cylinders		
A04 - Gouge or Cut Over 1/16" Deep		Depth: Length: Width:	A12 - Longitudinal Weld at 6:00 Position		
A05 - Dent Over 1/16" Deep		Depth: Length: Width:	A13 - Crack in Cylinder Wall		Depth: Length: Width:
A06 - Stiffening Ring Condition Unacceptable			A16 - Lifting Lug Defective		
A07 - Lugs Misaligned > 10 Degrees			A17 - Wide Channel Stiffening Ring Rusted Out		
A09 - Severe Pitting Corrosion		Length: Width:			

Cylinder Body			Valve End of Cylinder		
(A) Defect	(B)	(C) Size/Comment	(A) Defect	(B)	(C) Size/Comment
B01 - Cylinder Shell Body in Ground Contact		Depth: Section:	C01 - Evidence of Leakage/Contamination on Valve		
B03 - Cylinder in Standing Water or Evidence of Water/Cylinder Contact			C02 - Bent Valve Body		
B05 - Lifting Lug Contact		Serial Number of Other Cylinder:	C03 - Bent or Separated Skirt		
B06 - Improper Upper Tier Cylinder Support			C04 - Rust/Scale in Skirt or Weep Hole in Skirt is Plugged		Depth:
B07 - Wood Saddles/Resting Block in Use			C05 - Skirt in Ground Contact		
B08 - Concrete Saddle Defective			C06 - Weep Hole in Skirt Nonexistent or Misaligned		
B09 - Saddle Missing			C08 - Valve End Not Accessible		
B10 - Debris Between Saddle and Cylinder			C10 - Packing Nut Missing or Cracked		
B11 - Rust Bloom on Painted Cylinder		Length: Width:	C12 - Port Cap Missing or Cracked		
B12 - Coating System Failure			C13 - Valve Stem Defective		
B13 - Complete Coating System Failure			C14 - Plug in Place of Valve		
B14 - Stiffening Ring in Ground Contact			C15 - Valve Protector Cracked, Bent or Weld Cracked		

5. Cylinder Serial # 145409

Valve End of Cylinder					
(A) Defect	**(B)**	**(C) Size/Comment**			
C16 - ID Plate Missing/Off/Illegible					
C17 - ID Plate Loose/Cracked Weld					
C18 - New ID Tag		Serial Number of Other Cylinder:			
C21 - Nonstandard Valve					
Plug End of Cylinder					
D01 - Evidence of Leakage/Contamination on Plug					
D02 - Missing or Bent or Damaged Plug					
D03 - Bent or Separated Skirt					
D04 - Rust/Scale in Skirt or Weep Hole in Skirt is Plugged					
D05 - Skirt in Ground Contact					
D06 - Weep Hole in Skirt Nonexistent or Misaligned					
D08 - Plug End Not Accessible					
D10 - Rusted Plug					
D11 - Plug Sealed or Welded					
5. Cylinder Serial # 145409					

DOE 48-Inch Diameter UF6 Cylinder Inspection Checksheet
Procedure Reference: FS-2430 Rev 1

1. Site: PORT **4. Inspected by:** 56875 PAT SPRIGGS **Date:** 05-12-1997

2. Type: Post-Lift **Inspected by:** **Date:** 05-12-1997

3. Location: Y ____ S _ R _ P _ T/B _ **5. Cylinder Serial #:** 145409

6. Size: 10T **7. Model:** 48G **8. Name Plate Data: Water Cap** 0 **LB ; Tare Wt** 0 **LB**

Mechanical Integrity			Mechanical Integrity		
(A) Defect	**(B)**	**(C) Size/Comment**	**(A) Defect**	**(B)**	**(C) Size/Comment**
A01 - Hole In Cylinder/Evidence of Visible Leakage/Contamination/Reaction Products		Length: Width: Leakage:	A10 - Heavy Rust Scale on Cylinder Over 1/8" Thick and Over 2" in Diameter		Length: Width:
A03 - Bulge 1/2" or More		Height: Length: Width:	A11 - Stacking of Incompatible Cylinders		
A04 - Gouge or Cut Over 1/16" Deep		Depth: Length: Width:	A12 - Longitudinal Weld at 6:00 Position		
A05 - Dent Over 1/16" Deep		Depth: Length: Width:	A13 - Crack in Cylinder Wall		Depth: Length: Width:
A06 - Stiffening Ring Condition Unacceptable			A16 - Lifting Lug Defective		
A07 - Lugs Misaligned > 10 Degrees			A17 - Wide Channel Stiffening Ring Rusted Out		
A09 - Severe Pitting Corrosion		Length: Width:			

Cylinder Body			Valve End of Cylinder		
(A) Defect	(B)	(C) Size/Comment	(A) Defect	(B)	(C) Size/Comment
B01 - Cylinder Shell Body in Ground Contact		Depth: Section:	C01 - Evidence of Leakage/Contamination on Valve		
B03 - Cylinder in Standing Water or Evidence of Water/Cylinder Contact			C02 - Bent Valve Body		
B05 - Lifting Lug Contact		Serial Number of Other Cylinder:	C03 - Bent or Separated Skirt		
B06 - Improper Upper Tier Cylinder Support			C04 - Rust/Scale in Skirt or Weep Hole in Skirt is Plugged		Depth:
B07 - Wood Saddles/Resting Block in Use			C05 - Skirt in Ground Contact		
B08 - Concrete Saddle Defective			C06 - Weep Hole in Skirt Nonexistent or Misaligned		
B09 - Saddle Missing			C08 - Valve End Not Accessible		
B10 - Debris Between Saddle and Cylinder			C10 - Packing Nut Missing or Cracked		
B11 - Rust Bloom on Painted Cylinder		Length: Width:	C12 - Port Cap Missing or Cracked		
B12 - Coating System Failure			C13 - Valve Stem Defective		
B13 - Complete Coating System Failure			C14 - Plug in Place of Valve		
B14 - Stiffening Ring in Ground Contact			C15 - Valve Protector Cracked, Bent or Weld Cracked		

5. Cylinder Serial # 145409

Valve End of Cylinder					
(A) Defect	**(B)**	**(C) Size/Comment**			
C16 - ID Plate Missing/Off/Illegible					
C17 - ID Plate Loose/Cracked Weld					
C18 - New ID Tag		Serial Number of Other Cylinder:			
C21 - Nonstandard Valve					
Plug End of Cylinder					
D01 - Evidence of Leakage/Contamination on Plug					
D02 - Missing or Bent or Damaged Plug					
D03 - Bent or Separated Skirt					
D04 - Rust/Scale in Skirt or Weep Hole in Skirt is Plugged					
D05 - Skirt in Ground Contact					
D06 - Weep Hole in Skirt Nonexistent or Misaligned					
D08 - Plug End Not Accessible					
D10 - Rusted Plug					
D11 - Plug Sealed or Welded					
5. Cylinder Serial # 145409					

JK

UF-6 Storage Cylinder Manual U.T. Thickness Measurements

Cylinder I.D. 4B00 54 S2 Location: PORTS. Date: 6-15-99

Equipment

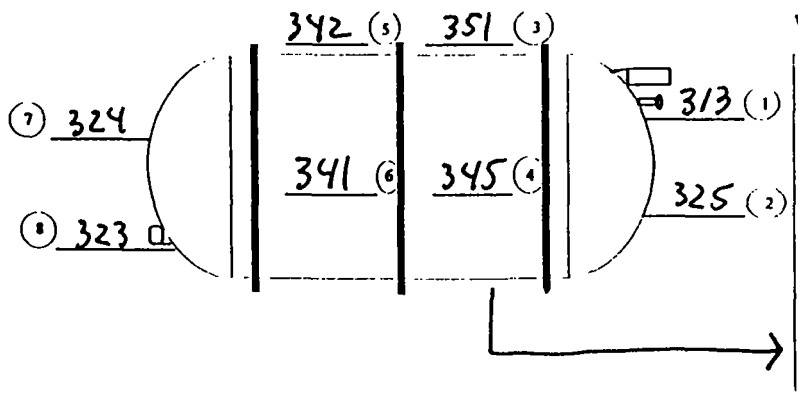
Ultrasonic Inst: Panametrics, 26DL PLUS (MOTH-022) Serial No. 93123906
Transducer: Panametrics

Frequency: 5.0 Serial No. 193076 Size: 0.312

11

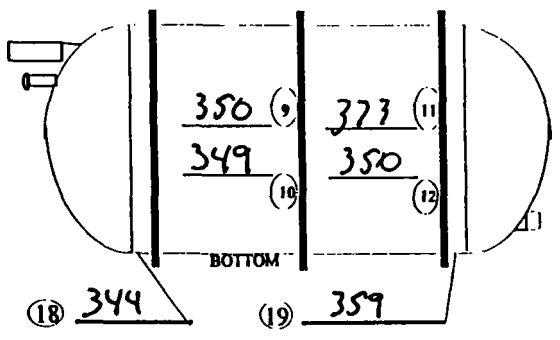
Calibration Information

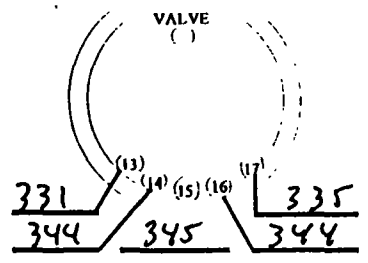
Cal.Standard: 0.100" thru 0.500"(MOTH-020) S/N: A14542 Cal.Start: OK Cal Finish: OK
Cyl. Temp: 65.5 Cal. Standard Temp. 64.8 Surface Prep: N/A



WORST COROSION AREA

A	343
B	337
C	339
D	344
E	350





Note: Any non-applicable blank, due to variations in Cyl. design, shall be marked "N/A".
Comments:

Technician: (Signature/Badge/Level R Tiemann 56971 II
R. Ladin 56202 II

Cylinder I.D. 4A0000628 Location: PORTS. Date: 7/17/00

Equipment

Ultrasonic Inst: Panametrics, 26DL PLUS (MOTH-025) 031 KT Serial No: ~~94194205~~ # 97051204 KT
Transducer: Panametrics

Frequency: 5.0 Serial No. 193076 Size: 0.312

Calibration Information

Cal.Standard: 0.250" thru 1.000"(MOTH-021) S/N: A13789 Cal.Start: OK Cal Finish: OK
Cyl. Temp: 68° Cal. Standard Temp. 69° Surface Prep: Wire Brush

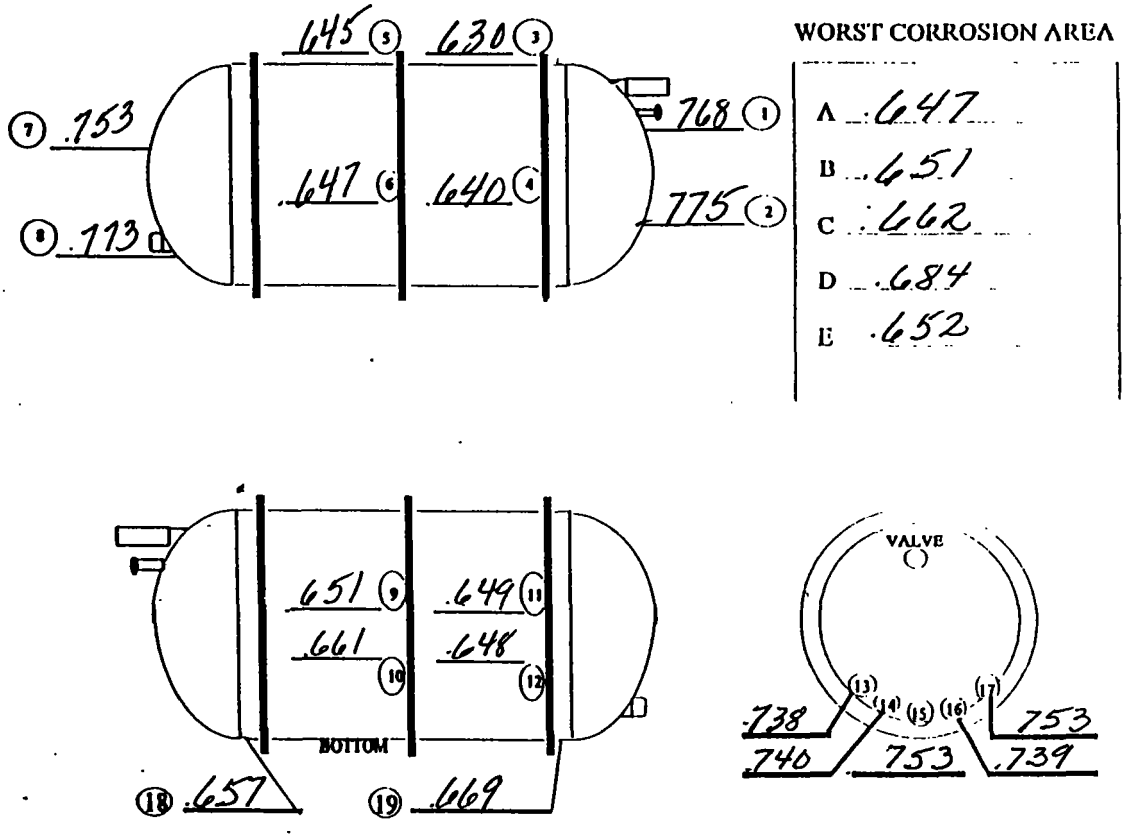


Figure 1

Note: Any non-applicable blank, due to variations in Cyl. design, shall be marked "N/A".
Comments: Uniform Corrosion

Technician: (Signature/Badge/Level R Tipton 6971 II
Samuel McGraw 55862 Level II

(RO) (E) SPECIAL PURPOSE RADIOLOGICAL SURVEY BUILDING: X745C LOCATION: LOT "

(circle one)

PURPOSE OF SURVEY: ANNUAL VALVE INSPECTION DATE: 1-30-01 TIME: 0630 SURVEY NO: CYL-1294 RWP NO: 01-DOE-00326

TECHNICIAN Kim Smith / Kim Smith BADGE: 634977 TECHNICIAN N/A BADGE: N/A

α MODEL: 2221 INST NO.: 102063 CAL DUE DATE: 2-28-01 PROBE NO.: 142941 CAL DUE DATE: 2-28-01 ALPHA CF 20-1 TOTAL 10.0 REMOVABLE

βγ MODEL: 2221 INST NO.: 103986 CAL DUE DATE: 2-28-01 PROBE NO.: B106H CAL DUE DATE: 3-15-01 BETA GAMMA CF 29.0 TOTAL 4.19 REMOVABLE

α MODEL: / INST NO.: / CAL DUE DATE: / PROBE NO.: / CAL DUE DATE: / ALPHA CF N/A TOTAL N/A REMOVABLE

βγ MODEL: N/A INST NO.: N/A CAL DUE DATE: N/A PROBE NO.: N/A CAL DUE DATE: N/A BETA GAMMA CF N/A TOTAL N/A REMOVABLE

α-βγ MODEL: / INST NO.: / CAL DUE DATE: / PROBE NO.: / CAL DUE DATE: / ALPHA CF N/A BETA/GAMMA CF N/A

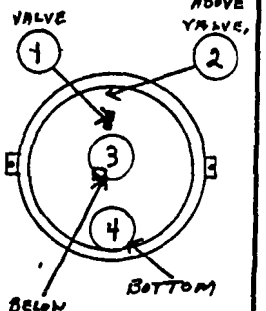
SCALER /DOSE RATE METER: / INST NO.: / CAL DUE DATE: / ALPHA EFF: / BETA/GAMMA EFF: N/A

ITEM NO	Counts/TOTAL α dpm/100 cm²	Counts/REMOVABLE α dpm/100 cm²	Counts/TOTAL βγ dpm/100 cm²	Counts/REMOVABLE βγ dpm/100 cm²	SAMPLE LOCATION AND/OR REMARKS
	Bkg: N/A cpm dpm Lc: N/A 100cm²	Bkg: 3 cpm 48 dpm Lc: 100cm²	Bkg: N/A cpm dpm Lc: N/A 100cm²	Bkg: 53 cpm 125 dpm Lc: 100cm²	Count Time = 12 sec
1-4	N/A	1 <LLc	N/A	16 <LLc	ALL

N/A

CYLINDER NUMBER's:

117483	115802	138639	114305
111618	115749	143372	114235
113087	115564	113588	113128
111920	115417	114346	112559
115727	115754B	113192	118279
113252	115622	114233	121877
114352	118379	112388	114270
118223	111573	111488	121538
117342	115741	115457	143117
114293	114727	114236	115200
111319	118375	117327	114267
118378	118306	117836	117395
117839	117905	115146	115731
115565	114250	112569	115758
118318	114288	114286	117334
117343	133369	111912	118314
117336	138720	114355	118312
113292	143132	118108	117329
114227	145112	115262	111244
115777	138698	113411	112391
115768	143148	115770	115651
114256	138795	118926	115429
111548	138471	112133	117344
111575	143149	115691	N/A
112552	138767	110661	



TYPICAL CYLINDER

NOTE: B = BAGGED VALVE.

NOTE: COUNT'S SHOWN ARE HIGHEST READING'S FOR ALL VALVE'S NOTED.

(98) ANNUAL'S COMPLETED.

Dose rates are in μrem/hr unless denoted otherwise

Rev.2 (11/14/00)

HP Supervisor Review: _____ / _____

signature / date

(ROUTINE) SPECIAL PURPOSE RADIOLOGICAL SURVEY

(circle one)

BUILDING: X745C LOCATION: LOT "L"

PURPOSE OF SURVEY: ANNUAL VALVE INSPECTION DATE: 1-12-01 TIME: 0630 SURVEY NO: CYL-1261 RWP NO: 01-00E-0032-G

TECHNICIAN KIM SMITH / Kim Smith BADGE: 634977 TECHNICIAN N/A BADGE: N/A

α MODEL: 2221 INST NO.: 102063 CAL DUE DATE: 2-28-01 PROBE NO.: 142941 CAL DUE DATE: 2-28-01 ALPHA CF 20.1 TOTAL 10.0 REMOVABLE

βγ MODEL: 2221 INST NO.: 103986 CAL DUE DATE: 2-28-01 PROBE NO.: B106H CAL DUE DATE: 3-15-01 BETA GAMMA CF 29.0 TOTAL 4.19 REMOVABLE

α MODEL: / INST NO.: / CAL DUE DATE: / PROBE NO.: / CAL DUE DATE: / ALPHA CF N/A TOTAL N/A REMOVABLE

βγ MODEL: N/A INST NO.: N/A CAL DUE DATE: N/A PROBE NO.: N/A CAL DUE DATE: N/A BETA GAMMA CF N/A TOTAL N/A REMOVABLE

α-βγ MODEL: / INST NO.: / CAL DUE DATE: / PROBE NO.: / CAL DUE DATE: / ALPHA CF N/A BETA/GAMMA EFF. FACTOR N/A

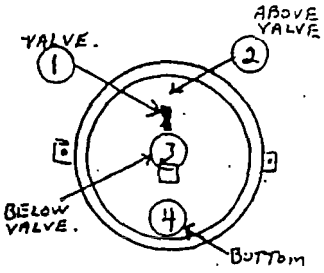
SCALER /DOSE RATE METER: / INST NO.: / CAL DUE DATE.: / ALPHA EFF: / BETA/GAMMA EFF: N/A

Bkg/Lc	N/A	1 / 48	N/A	56 / 131	Count Time = 12 sec
ITEM NO	Counts/TOTAL α dpm/100 cm²	Counts/REMOVABLE α dpm/100 cm²	Counts/TOTAL β,γ dpm/100 cm²	Counts/REMOVABLE β,γ dpm/100 cm²	SAMPLE LOCATION AND/OR REMARKS
1-4	N/A	1 / <Lc	N/A	17 / <Lc	ALL
	/	/	/	/	
	/	/	/	/	
	/	/	/	/	
	/	/	/	/	
	/	/	/	/	
	/	/	/	/	
	/	/	/	/	
	/	/	/	/	
	/	/	/	/	
	/	/	/	/	
	/	/	N/A	/	
	/	/	/	/	
	/	/	/	/	
	/	/	/	/	
	/	/	/	/	
	/	/	/	/	
	/	/	/	/	
	/	/	/	/	
	/	/	/	/	

CYLINDER NUMBER'S :

115653 ✓	113164	115026	117221
111431 ✓	117495	114980	121770
115142 ✓	117333	111427	118972
115630 ✓	102126	111634	112336
115160 ✓	18207	114357	117500
115212 ✓	101440	115102	114306
115164 ✓	17329	114968	114633
115353	142009	115823	113282
111294	110692	115291	113402
111207	111428	114565	112399
111402	115181	115089	112346
115339	115699	115290	112427
115319	115088	115209	111190
110680	115814	110683	111592
115122	115788	114659	113248
110821	115751	115608	117491
113499	114723	114676	113451
111255	115104	115268	110770
114428	115805	115503	117509
113363	114336	111576	117409
111519	115762	111113	113406
119745	111674	114445	111614
112065	111508	115517	112649
115786	115484	117257	117447
115782	111632	119290	113414

Sketch/description of area/item surveyed



TYPICAL CYLINDER

NOTE: P = PLUG IN LIEU OF VALVE
B = BAGGED VALVE.

NOTE: COUNTS SHOWN ARE HIGHEST READING'S FOR ALL CYLINDER'S NOTED.

(100) ANNUAL'S COMPLETED.

Dose rates are in µrem/hr unless denoted otherwise

Rev.1 (9/22/00)

HP Supervisor Review: / signature / d

TO:7408973205

FINE/SPECIAL PURPOSE RADIOLOGICAL SURVEY

(circle one)

BUILDING: X745C LOCATION: LOT'S C, E & G

Page 1 of 2.

PURPOSE OF SURVEY: 50 urem/HR BOUNDRY SURVEY DATE: 1-12-00 TIME: 1730 SURVEY NO: CYL-08245 RWP NO: ~~00~~ N/A

TECHNICIAN: KIM SMITH / Kim Smith	BADGE: 634977	TECHNICIAN: N/A	BADGE: N/A		
α MODEL: /	INST NO.: /	CAL DUE DATE: /	PROBE NO.: /	CAL DUE DATE: /	BKGD: /
βγ MODEL: N/A	INST NO.: N/A	CAL DUE DATE: N/A	PROBE NO.: /	CAL DUE DATE: /	BKGD: N/A
α MODEL: /	INST NO.: /	CAL DUE DATE: /	PROBE NO.: N/A	CAL DUE DATE: N/A	BKGD: /
βγ MODEL: /	INST NO.: /	CAL DUE DATE: /	PROBE NO.: /	CAL DUE DATE: /	BKGD: /
γ MODEL: MICRO REM BKRON	INST NO.: B682R	CAL DUE DATE: 9-22-00	PROBE NO.: /	CAL DUE DATE: /	BKGD: 20 urem/HR
SCALER TYPE: N/A	INST NO.: N/A	CAL DUE DATE: N/A	PROBE NO.: /	ALPHA MDA: /	BETA/GAMMA MDA: N/A

ITEM NO	TOTAL α dpm/100 cm²	REMOVABLE α dpm/100 cm²	TOTAL β,γ dpm/100 cm²	REMOVABLE β,γ dpm/100 cm²	SAMPLE LOCATION AND/OR REMARKS
MDA					

N/A

ITEM NO	TOTAL α dpm/100 cm²	REMOVABLE α dpm/wipe	TOTAL β,γ dpm/100 cm²	REMOVABLE β,γ dpm/wipe	SAMPLE LOCATION AND/OR REMARKS
MDA					

Sketch of area/item surveyed

NOTE: ATTACHED MAP SHOWS 50 urem/HR BOUNDRY AROUND EACH OF THE CURRENT DOE CYLINDER YARD'S. (X745C LOTS E, C, & G).

Post-it™ brand fax transmittal memo 7671 | # of pages ▸ 10

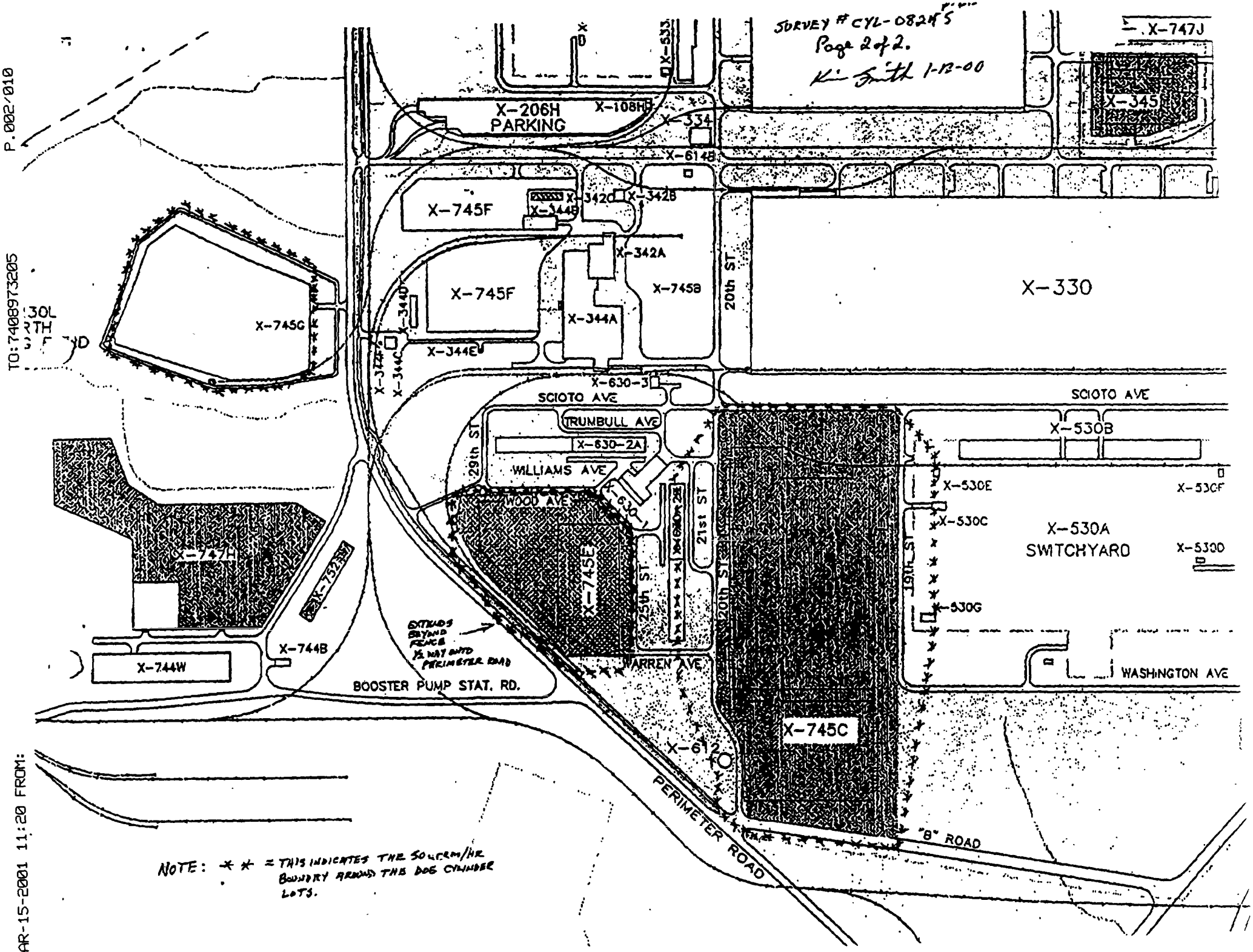
To R. McDermott	From D. Stowe
Co.	Co.
Dept.	Phone # 6348
Fax # 3205	Fax # 4589

Dose rates are in μrem/hr unless denoted otherwise

HP Supervisor Review: _____ / _____

signature / date

SURVEY # CYL-0824'S
Page 2 of 2.
K. Smith 1-12-00



NOTE: * * = THIS INDICATES THE 50 ug/cm/HR BOUNDRY AROUND THE DOE CYLINDER LOTS.

MAR-15-2001 11:20 FROM: TO: 7408973205 P.003/010

Hand Written Copy

ROUTINE/SPECIAL PURPOSE RADIOLOGICAL SURVEY

(circle one) [ROUTINE circled]

BUILDING: X745C LOCATION: 'C' LOT

PURPOSE OF SURVEY: PERIMETER ANNUAL DOSE ASSESSMENT DATE: 1-11-00 TIME: 1800 SURVEY NO: CYL-0820 RWP NO: 00-DOE-00096

TECHNICIAN Kim Smith / Kim Smith BADGE: 634977 TECHNICIAN N/A BADGE: N/A

α MODEL: N/A	INST NO.: N/A	PROBE NO.: N/A	CAL DUE DATE: N/A	BKGD: N/A
β/γ MODEL: N/A	INST NO.: N/A	PROBE NO.: N/A	CAL DUE DATE: N/A	BKGD: N/A
α MODEL: N/A	INST NO.: N/A	PROBE NO.: N/A	CAL DUE DATE: N/A	BKGD: N/A
β/γ MODEL: N/A	INST NO.: N/A	PROBE NO.: N/A	CAL DUE DATE: N/A	BKGD: N/A
γ MODEL: Bicron	INST NO.: B673 R	PROBE NO.:	CAL DUE DATE: 10-19-00	BKGD: 50 urem/hr
SCALER TYPE: N/A	INST NO.: N/A	PROBE NO.:	ALPHA MDA: N/A	BETA/GAMMA MDA: N/A

ITEM NO	TOTAL α dpm/100 cm²	REMOVABLE α dpm/100 cm²	TOTAL β,γ dpm/100 cm²	REMOVABLE β,γ dpm/100 cm²	SAMPLE LOCATION AND/OR REMARKS
MDA	1660	800	5000	700	NA

N/A

Sketch of area/item surveyed

Dose rates are in µrem/hr unless denoted otherwise

HP Supervisor Review

[illegible]NE/SPECIAL PURPOSE RADIOLOGICAL SURVEY

(circle one)

BUILDING: X745C LOCATION: C/[illegible] 7,95391

PURPOSE OF SURVEY: [illegible] DATE: [illegible] TIME: [illegible] SURVEY NO: CVI-0819 RWP NO: [illegible]

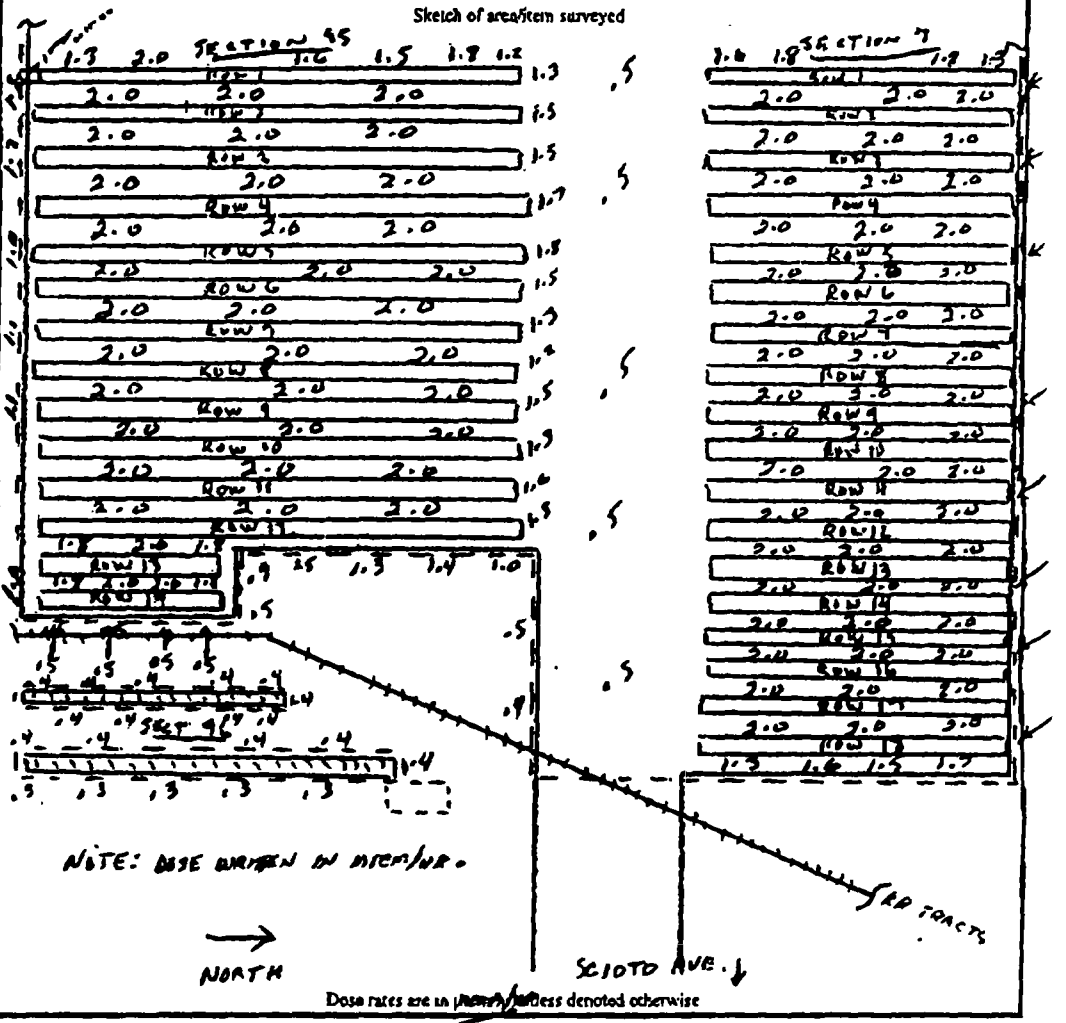
TECHNICIAN: Kim Smith / Kim Smith		BADGE: 634977	TECHNICIAN: N/A		BADGE: N/A
α MODEL: N/A	INST NO.: N/A	CAL DUE DATE: N/A	PROBE NO.: N/A	CAL DUE DATE: N/A	BKGD: N/A
βγ MODEL: N/A	INST NO.: N/A	CAL DUE DATE: N/A	PROBE NO.: N/A	CAL DUE DATE: N/A	BKGD: N/A
α MODEL: N/A	INST NO.: N/A	CAL DUE DATE: N/A	PROBE NO.: N/A	CAL DUE DATE: N/A	BKGD: N/A
βγ MODEL: N/A	INST NO.: N/A	CAL DUE DATE: N/A	PROBE NO.: N/A	CAL DUE DATE: N/A	BKGD: N/A
γ MODEL: Micron Microrad	INST NO.: B693R	CAL DUE DATE: 10-17-2000	PROBE NO.: N/A	CAL DUE DATE: N/A	BKGD: 50 mrem/hr
SCALER TYPE: N/A	INST NO.: N/A	CAL DUE DATE: N/A	PROBE NO.: N/A	ALPHA MDA: N/A	BETA/GAMMA MDA: N/A

ITEM NO	TOTAL α dpm/100 cm²	REMOVABLE α dpm/100 cm²	TOTAL β,γ dpm/100 cm²	REMOVABLE β,γ dpm/100 cm²	SAMPLE LOCATION AND/OR REMARKS
MDA					

N

ITEM NO	TOTAL α dpm/100 cm²	REMOVABLE α dpm/wipe	TOTAL β,γ dpm/100 cm²	REMOVABLE β,γ dpm/wipe	SAMPLE LOCATION AND/OR REMARKS
MDA					

Sketch of area/item surveyed



Dose rates are in [illegible] unless denoted otherwise

HP Supervisor Review: _____ / _____

signature / date

TINE/SPECIAL PURPOSE RADIOLOGICAL SURVEY

BUILDING: X745 C LOCATION: C SECT 2, 20, 31

(circle one)
PURPOSE OF SURVEY: ANNUAL DOSE ASSESSMENT DATE: 1-11-2000 TIME: 0815 SURVEY NO: CYL-0818 RWP NO: 00-DOE-00096

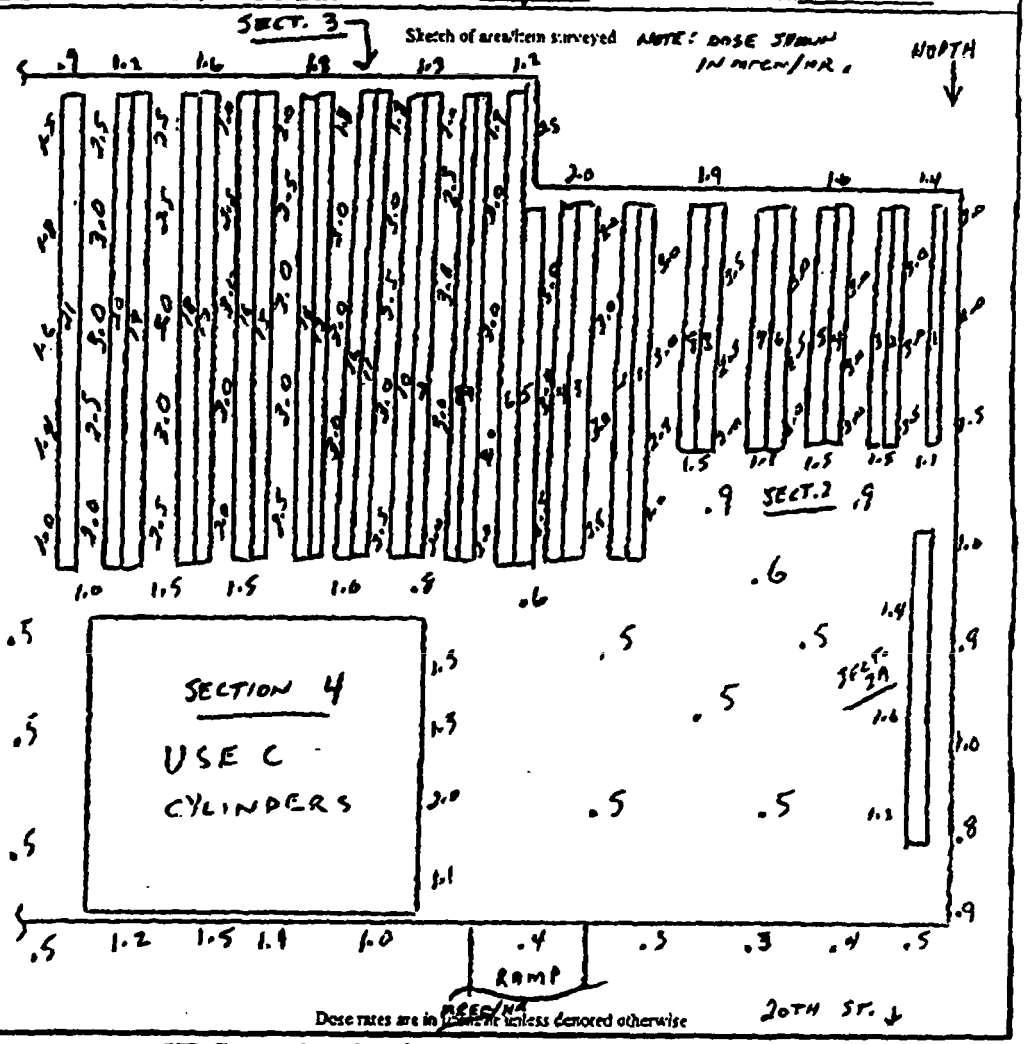
TECHNICIAN Kim Smith / Kim Smith	BADGE: 634977	TECHNICIAN N/A	BADGE: N/A		
α MODEL: /	INST NO.: /	CAL DUE DATE: /	PROBE NO.: /	CAL DUE DATE: /	BKGD: /
βγ MODEL: N/A	INST NO.: N/A	CAL DUE DATE: N/A	PROBE NO.: /	CAL DUE DATE: /	BKGD: N/A
α MODEL: /	INST NO.: /	CAL DUE DATE: /	PROBE NO.: N/A	CAL DUE DATE: N/A	BKGD: /
βγ MODEL: /	INST NO.: /	CAL DUE DATE: /	PROBE NO.: /	CAL DUE DATE: /	BKGD: /
γ MODEL: Ahron [illegible]	INST NO.: B673 R	CAL DUE DATE: 10-19-2000	PROBE NO.: /	CAL DUE DATE: /	BKGD: 50 μrem/HR
SCALER TYPE: N/A	INST NO.: N/A	CAL DUE DATE: N/A	PROBE NO.: /	ALPHA MDA: /	BETA/GAMMA MDA: N/A

ITEM NO	TOTAL α dpm/100 cm²	REMOVABLE α dpm/100 cm²	TOTAL β,γ dpm/100 cm²	REMOVABLE β,γ dpm/100 cm²	SAMPLE LOCATION AND/OR REMARKS
MDA					

N/A

ITEM NO	TOTAL α dpm/100 cm²	REMOVABLE α dpm/wipe	TOTAL β,γ dpm/100 cm²	REMOVABLE β,γ dpm/wipe	SAMPLE LOCATION AND/OR REMARKS
MDA					

Sketch of area/item surveyed NOTE: DOSE SHOWN IN mrem/HR.



Dose rates are in mrem/HR unless denoted otherwise

HP Supervisor Review: _____ / _____
signature / date

(ROUTINE) RADIOLOGICAL SURVEY (cle one)

BUILDING: [illegible] LOCATION: [illegible]

Or SURVEY: ANNUAL DOSE ASSESSMENT DATE: 1-11-2000 TIME: 0815 SURVEY NO: CYL-0817 RWP NO. 00-0009G

CIAN Kim Smith, Kim Smith BADGE: 634977 TECHNICIAN N/A BADGE:

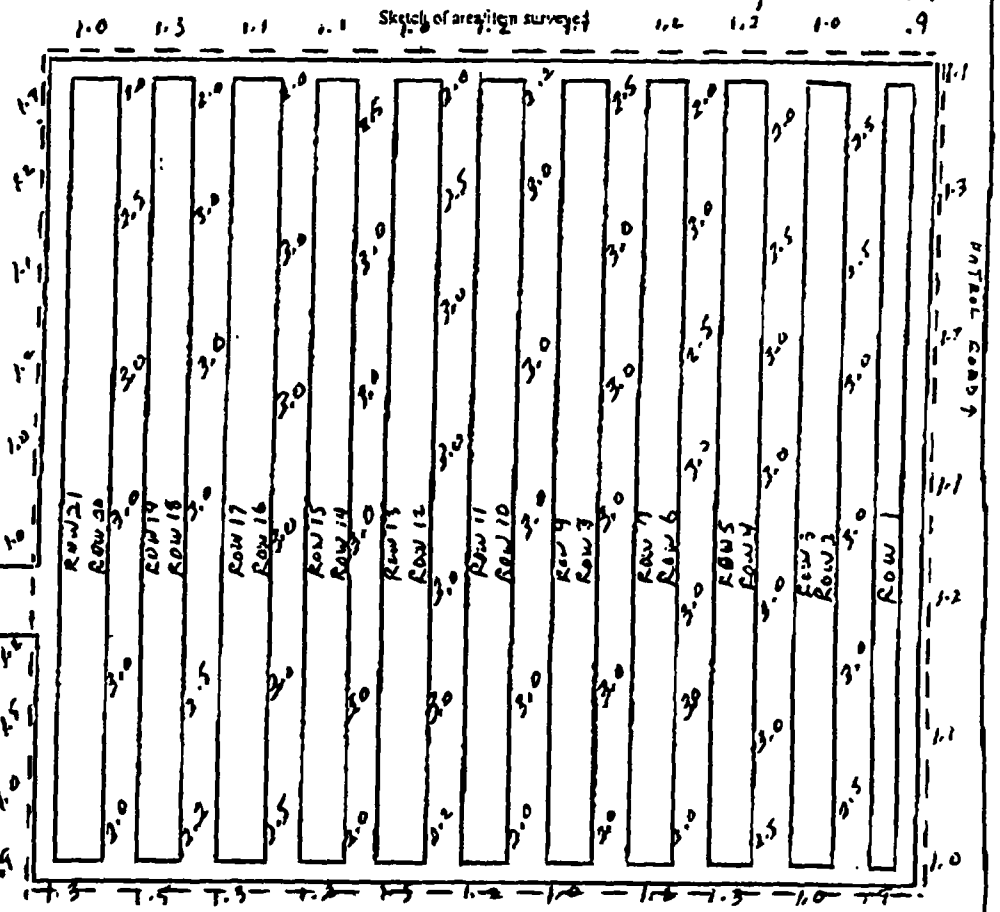
α MODEL:		INST NO.:		CAL DUE DATE:		PROBE NO.:		CAL DUE DATE:		BKGD:	
βγ MODEL:	N/A	INST NO.:	N/A	CAL DUE DATE:	N/A	PROBE NO.:	N/A	CAL DUE DATE:	N/A	BKGD:	N/A
α MODEL:		INST NO.:		CAL DUE DATE:		PROBE NO.:		CAL DUE DATE:		BKGD:	
βγ MODEL:		INST NO.:		CAL DUE DATE:		PROBE NO.:		CAL DUE DATE:		BKGD:	
γ MODEL:	BICRON MICRO R	INST NO.:	8673R	CAL DUE DATE:	10-19-2000	PROBE NO.:	N/A	CAL DUE DATE:	N/A	BKGD:	50 UTEM/HR
SCALER TYPE:	N/A	INST NO.:	N/A	CAL DUE DATE:	N/A	PROBE NO.:		ALPHA MDA:		BETA/GAMMA MDA:	N/A

ITEM NO	TOTAL α dpm/100 cm²	REMOVABLE α dpm/100 cm²	TOTAL β,γ dpm/100 cm²	REMOVABLE β,γ dpm/100 cm²	SAMPLE LOCATION AND/OR REMARKS
MDA					

N/A

ITEM NO	TOTAL α dpm/100 cm²	REMOVABLE α dpm/wipe	TOTAL β,γ dpm/100 cm²	REMOVABLE β,γ dpm/wipe	SAMPLE LOCATION AND/OR REMARKS
MDA					

Sketch of area/item surveyed



X745 C LOT SECTION 2

NORTH

Dose rates are in ~~prem~~/hr unless denoted otherwise

HP Supervisor Review: _____ / _____

signature / date

(ROUTINE) SPECIAL PURPOSE RADIOLOGICAL SURVEY

(circle one)

BUILDING: X745E LOCATION: 'E' LOT

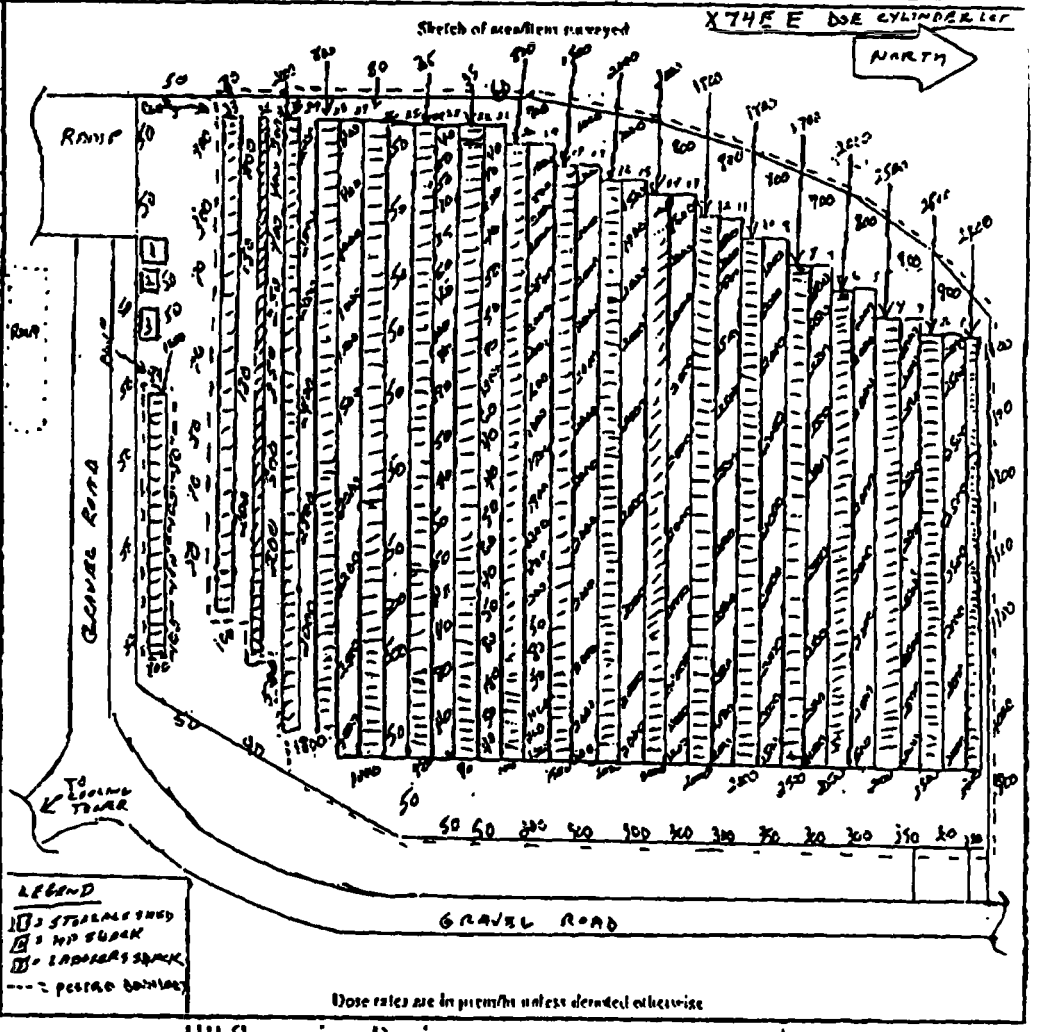
PURPOSE OF SURVEY: ANNUAL DOSE ASSESSMENT 1-10-2000 DATE: 1-10-2000 TIME: 1800 SURVEY NO: CYL-0816 RWP NO: DD-DOE-00096

TECHNICIAN: KIM SMITH BADGE: 634977 TECHNICIAN: N/A BADGE: N/A

α MODEL:	INST NO.:	PROBE NO.:	CAL DUE DATE:	BKGD:	
βγ MODEL:	INST NO.: N/A	PROBE NO.: N/A	CAL DUE DATE: N/A	BKGD: N/A	
α MODEL: N/A	INST NO.: N/A	PROBE NO.: N/A	CAL DUE DATE: N/A	BKGD: N/A	
βγ MODEL:	INST NO.:	PROBE NO.:	CAL DUE DATE:	BKGD:	
γ MODEL: BICRON NEBOREM	INST NO.: B673R	PROBE NO.: N/A	CAL DUE DATE: 10-19-2000	BKGD: 50 uREM/HR	
SCALER TYPE: N/A	INST NO.: N/A	PROBE NO.: N/A	ALPHA MDA: N/A	BETA/GAMMA MDA: N/A	

ITEM NO	TOTAL α dpm/100 cm²	REMOVABLE α dpm/100 cm²	TOTAL β,γ dpm/100 cm²	REMOVABLE β,γ dpm/100 cm²	SAMPLE LOCATION AND/OR REMARKS
MDA	1600	800	5000	100	NA
			N/A		

Sketch of area/item surveyed



Dose rates are in prem/hr unless denoted otherwise

HP Supervisor Review: _____ / _____

signature / date

WF copy

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 06 2001

REPLY TO THE ATTENTION OF DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Keep both copies

Ms. Sharron Robinson
Site Manager
United States Department of Energy
Portsmouth Gaseous Diffusion Plant
Post Office Box 700
Piketon, Ohio 45661

Re: Notice of Violation
RCRA Compliance Inspection
United States Department of Energy -
Portsmouth Gaseous Diffusion Plant
OH7 890 008 983

Dear Ms. Robinson:

On June 19 through June 23, 2000, United States Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) representatives inspected your installation located near Piketon, Ohio. The purpose of the inspection was to evaluate compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by U.S. Department of Energy (U.S. DOE) and Bechtel Jacobs personnel, review of records, and physical observations by the inspectors at the time of the investigation, U.S. EPA and OEPA have determined that your installation is engaged in the management of hazardous waste. We also determined that the U.S. DOE-Portsmouth facility has violated the following requirements of the Ohio Administrative Code (OAC):

1) Rule 3745-52-34(C)(1)(b) specifies that a generator may accumulate as much as fifty-five gallons of hazardous waste or one quart of acutely hazardous waste in containers at or near any point of generation where wastes initially accumulate, provided that: the containers are marked either

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 50% Recycled Paper (20% Postconsumer)

with the words "Hazardous Waste" or with other words that identify the contents of the containers. During the inspection of Building X-623 at the Air Stripper, the inspectors observed a container of recovered TCE which was not labeled as "Hazardous Waste" or "Recovered TCE Solvent Waste". The inspectors were told by U.S. DOE personnel that this was a satellite accumulation area, and when the container is full, is moved to a less than 90 day accumulation area. U.S. DOE should label this container as containing "Hazardous Waste" or "Recovered TCE Solvent Waste". (See enclosed photos).

2) Rule 3745-52-20(A) requires that a generator who transports, or offers for transportation, hazardous waste for off-site treatment, storage, or disposal shall prepare a uniform hazardous waste manifest, U.S. EPA form 8700-22. Section 3745-52-20(B) specifies that completion of item I, which relates to the U.S. EPA hazardous waste number, is required. During the record review portion of the inspection, the inspectors reviewed approximately 50 1999 hazardous waste manifests from the sludge from Building X-701B, and found that U.S. DOE had not placed the hazardous waste codes F001 and F003 in box I of U.S. EPA's Hazardous Waste Manifest (U.S. EPA form 8700-22). However, the inspectors found that in one instance from 2/16/99, the hazardous waste manifest form was completed correctly. U.S. DOE should make sure that box I of the U.S. EPA manifest form is completed correctly, prior to any off-site shipments.

The following are Areas of Concern based on observations by U.S. EPA and OEPA:

1) Area of Concern - U.S. DOE was not placing hazardous waste codes on containers in the less than 90 day accumulation areas (this was observed throughout the plant). While not required in the OAC, U.S. DOE was placing an internal tracking number on each container. The inspectors concern is that procedures be in place to correctly identify the alpha numeric U.S. EPA hazardous waste code from the internal tracking number when hazardous waste is shipped off-site.

2) Area of Concern - The inspectors reviewed the annual RCRA refresher course training records as required by OAC Rule 3745-54-16(D). The inspectors found the training records for each employee to be confusing because of different course numbers each year. It is our understanding that U.S. DOE contracts with United States Enrichment Corporation (USEC) for maintaining the training records. U.S. EPA and

OEPA found similar problems with the USEC employees training records.

3) Area of Concern - During the inspection, the inspectors were unable to verify if U.S. DOE was complying with the OEPA Director's Findings and Orders of February 28, 1998, for the storage of lithium hydroxide (LiOH) and depleted uranium hexafluoride (DUF). The OEPA Order allows for the storage of depleted uranium hexafluirode for a period of 10 years. However, certain record-keeping requirements are specified in the 1998 Order. For example, requirements must be met for Buildings X-744T, U, S, K, N, P, and Q:

✓ 1) A visual inspection of each LiOH warehouse on afternoon and evening shifts each Monday through Friday;

✓ 2) Monthly inspections of the accessible portions of the interior of each warehouse;

3) Storage of shipping containers shall not exceed 120 days in the staging area;

4) The staging area shall be covered with a protective covering, all drums shall be covered with a waterproof covering;

5) The Contingency Plan shall be implemented in response to an emergency involving LiOH; and

6) In addition, training is required for personnel involved in inspections and management of the LiOH.

In addition, the DUF Management Plan specifies that:

1) Inspections are to be completed of the DUF cylinders at least every four (4) years;

2) After the DUF cylinders have been restacked in FY 1999, 150 cylinders shall be inspected on an annual basis;

3) Ultrasonic Thickness Testing - Shall be completed on 10 percent of the cylinders moved during fiscal years 1996, 1997, and 1998 (about 500 cylinders shall be ultra thickness measured);

4) All DUF cylinders and storage yards shall be radiologically surveyed annually to ensure that no area of the yards exceeds 5 mr/hr; and

5) DUF cylinder maintenance program which involves renewing the protective coating of cylinders as necessary to avoid excessive corrosion.

Please provide to U.S. EPA copies of records that document that the LiOH and depleted DUF Management Plans are being implemented pursuant to the 1998 OEPA Order.

Pursuant to Section 3008(a) of RCRA, U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above requirements.

If you have any questions regarding this letter, please contact Walt Francis of my staff at (312) 353-4921.

Sincerely yours,

Walt Francis for P.L.

Paul Little, Chief
Compliance Section #2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosure

cc: Melody Stewart, OEPA-SE District Office

FEB 06 2001

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

keep both copies

Ms. Sharron Robinson
Site Manager
United States Department of Energy
Portsmouth Gaseous Diffusion Plant
Post Office Box 700
Piketon, Ohio 45661

Re: Notice of Violation
RCRA Compliance Inspection
United States Department of Energy -
Portsmouth Gaseous Diffusion Plant
OH7 890 008 983

Dear Ms. Robinson:

On June 19 through June 23, 2000, United States Environmental Protection Agency (U.S. EPA) and Ohio Environmental Protection Agency (OEPA) representatives inspected your installation located near Piketon, Ohio. The purpose of the inspection was to evaluate compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by U.S. Department of Energy (U.S. DOE) and Bechtel Jacobs personnel, review of records, and physical observations by the inspectors at the time of the investigation, U.S. EPA and OEPA have determined that your installation is engaged in the management of hazardous waste. We also determined that the U.S. DOE-Portsmouth facility has violated the following requirements of the Ohio Administrative Code (OAC):

1) Rule 3745-52-34(C)(1)(b) specifies that a generator may accumulate as much as fifty-five gallons of hazardous waste or one quart of acutely hazardous waste in containers at or near any point of generation where wastes initially accumulate, provided that: the containers are marked either

with the words "Hazardous Waste" or with other words that identify the contents of the containers. During the inspection of Building X-623 at the Air Stripper, the inspectors observed a container of recovered TCE which was not labeled as "Hazardous Waste" or "Recovered TCE Solvent Waste". The inspectors were told by U.S. DOE personnel that this was a satellite accumulation area, and when the container is full, is moved to a less than 90 day accumulation area. U.S. DOE should label this container as containing "Hazardous Waste" or "Recovered TCE Solvent Waste". (See enclosed photos).

2) Rule 3745-52-20(A) requires that a generator who transports, or offers for transportation, hazardous waste for off-site treatment, storage, or disposal shall prepare a uniform hazardous waste manifest, U.S. EPA form 8700-22. Section 3745-52-20(B) specifies that completion of item I, which relates to the U.S. EPA hazardous waste number, is required. During the record review portion of the inspection, the inspectors reviewed approximately 50 1999 hazardous waste manifests from the sludge from Building X-701B, and found that U.S. DOE had not placed the hazardous waste codes F001 and F003 in box I of U.S. EPA's Hazardous Waste Manifest (U.S. EPA form 8700-22). However, the inspectors found that in one instance from 2/16/99, the hazardous waste manifest form was completed correctly. U.S. DOE should make sure that box I of the U.S. EPA manifest form is completed correctly, prior to any off-site shipments.

The following are Areas of Concern based on observations by U.S. EPA and OEPA:

1) Area of Concern - U.S. DOE was not placing hazardous waste codes on containers in the less than 90 day accumulation areas (this was observed throughout the plant). While not required in the OAC, U.S. DOE was placing an internal tracking number on each container. The inspectors concern is that procedures be in place to correctly identify the alpha numeric U.S. EPA hazardous waste code from the internal tracking number when hazardous waste is shipped off-site.

2) Area of Concern - The inspectors reviewed the annual RCRA refresher course training records as required by OAC Rule 3745-54-16(D). The inspectors found the training records for each employee to be confusing because of different course numbers each year. It is our understanding that U.S. DOE contracts with United States Enrichment Corporation (USEC) for maintaining the training records. U.S. EPA and

OEPA found similar problems with the USEC employees training records.

3) Area of Concern - During the inspection, the inspectors were unable to verify if U.S. DOE was complying with the OEPA Director's Findings and Orders of February 28, 1998, for the storage of lithium hydroxide (LiOH) and depleted uranium hexafluoride (DUF). The OEPA Order allows for the storage of depleted uranium hexafluirode for a period of 10 years. However, certain record-keeping requirements are specified in the 1998 Order. For example, requirements must be met for Buildings X-744T, U, S, K, N, P, and Q:

   1) A visual inspection of each LiOH warehouse on afternoon and evening shifts each Monday through Friday;

   2) Monthly inspections of the accessible portions of the interior of each warehouse;

   3) Storage of shipping containers shall not exceed 120 days in the staging area;

   4) The staging area shall be covered with a protective covering, all drums shall be covered with a waterproof covering;

   5) The Contingency Plan shall be implemented in response to an emergency involving LiOH; and

   6) In addition, training is required for personnel involved in inspections and management of the LiOH.

In addition, the DUF Management Plan specifies that:

   1) Inspections are to be completed of the DUF cylinders at least every four (4) years;

   2) After the DUF cylinders have been restacked in FY 1999, 150 cylinders shall be inspected on an annual basis;

   3) Ultrasonic Thickness Testing - Shall be completed on 10 percent of the cylinders moved during fiscal years 1996, 1997, and 1998 (about 500 cylinders shall be ultra thickness measured);

   4) All DUF cylinders and storage yards shall be radiologically surveyed annually to ensure that no area of the yards exceeds 5 mr/hr; and

5) DUF cylinder maintenance program which involves renewing the protective coating of cylinders as necessary to avoid excessive corrosion.

Please provide to U.S. EPA copies of records that document that the LiOH and depleted DUF Management Plans are being implemented pursuant to the 1998 OEPA Order.

Pursuant to Section 3008(a) of RCRA, U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above requirements.

If you have any questions regarding this letter, please contact Walt Francis of my staff at (312) 353-4921.

Sincerely yours,

Paul Little, Chief
Compliance Section #2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosure

cc: Melody Stewart, OEPA-SE District Office

bcc: John Gierczak, U.S. EPA - Cleveland Office
Monesh Chabria, C-14J

OFFICIAL FILE COPY

ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY
AUTHOR/ TYPIST wf 2/6/01	COMPLIANCE SECTION 1	COMPLIANCE SECTION 2 wf 2/6/01	CORRECTIVE ACTION SECTION	ECAB BRANCH CHIEF	WPTD DIVISION DIRECTOR

OhioEPA
State of Ohio Environmental Protection Agency

STREET ADDRESS:
1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

March 18, 1999

C/A 4/99

Re: Director's Final Findings & Orders
United States Department of Energy
Portsmouth Gaseous Diffusion Plant
Bechtel Jacobs Company LLC
US EPA ID No.: OH7 890 008 983
Piketon, Ohio

X740 - CP 6/17/96
X 344A - [illegible]
X-744G - Closed - Appd [illegible]
X-701C - CP - [illegible]
Ed[illegible] Pond & Oil Sep. CP 2/95
X-752 - CLOSED - Appd 1-31-95
X-344A - CP Appd 2-23-94
X-744Y - CP Amended 6-28-94
X-749 - PC PLAN 5/92

CERTIFIED MAIL

C. Ray Miskelley, Esq.
Office of the Chief Counsel
U.S. Department of Energy
200 Administration Road
Oak Ridge, Tennessee 37831

Patrick W. Willison, Esq.
Bechtel-Jacobs Company LLC
East Tennessee Technology Park
Building K-1225 Room 123
Oak Ridge, Tennessee 37831-7294

Dear Sirs:

Transmitted herewith are Final Findings & Orders of the Director concerning the matter indicated.

Sincerely yours,

Thomas E. Crepeau

Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

TEC/dhs

cc: Frances Kovac, Legal
Dave Sholtis, Asst. Chief, DHWM
Melody Stewart, DHWM, SEDO
Maria Galanti, DERR, SEDO
Steve Rine, DSIWM, SEDO
Kevin Johnson, PIC
Eugene Gillespie, US DOE
John Shoemaker, Bechtel-Jacobs

File

BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:

United States Department of Energy	:	Director's Final
Portsmouth Gaseous Diffusion Plant	:	Findings and Orders
P.O. Box 700	:	
Piketon, Ohio 45661-0700	:	

Bechtel Jacobs Company LLC
Portsmouth Gaseous Diffusion Plant
P.O. Box 900
Piketon, Ohio 45661-0628

Respondents

PREAMBLE

It is hereby agreed by and among the Parties hereto as follows:

I. JURISDICTION

These Director's Final Findings and Orders ("Orders") are issued to the U.S. Department of Energy (" DOE") and Bechtel Jacobs Company LLC ("Bechtel Jacobs Company") pursuant to the authority vested in the Director of Environmental Protection ("Director") under chapters 3745 and 6111 of the Ohio Revised Code ("ORC") and the solid and hazardous waste laws in ORC chapter 3734, including ORC sections 3734.13, 3734.20, 3734.02(A) and 3734.02(G).

II. PURPOSE OF THESE ORDERS

The purpose of these Orders is:

1. To integrate the on-site work required for specific units under Section V of the Consent Decree and under the Ohio Administrative Code with the requirements of Section VII of the Consent Decree, and requirements of the Administrative Order by Consent in order to avoid duplication of effort, and efficiently perform sitewide ground water monitoring and surveillance and maintenance activities at PORTS;

2. To recognize that a substantial portion of the tasks required under existing approved

ENTERED DIRECTOR'S JOURNAL
MAR 18 1999
OHIO E.P.A.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency
By: _____ Date 3/18/99

closure plans for certain units have been completed in accordance with those closure plans and to provide for the incorporation of the remaining tasks into the Integrated Groundwater Monitoring Plan and the Surveillance & Maintenance Plans and to terminate any further obligation under the existing closure plans;

3. To provide exemptions from specific solid and hazardous waste requirements of the Ohio Administrative Code as necessary to accomplish Purpose 1, above.

III. PARTIES BOUND

These Orders shall apply to and be binding upon the Respondents, their assigns and successors in interest. With respect to DOE, no change in ownership or operation of the Site will in any way alter DOE's responsibilities under these Orders, except as provided by law. The obligations of Bechtel Jacobs Company under these Orders shall terminate when Bechtel Jacobs Company is no longer responsible pursuant to contract with DOE to perform work under these Orders; provided, however, that this Section of the Orders does not absolve Bechtel Jacobs Company from any liability for any violation which occurs prior to the termination of such contract. Except as otherwise expressly provided herein, Respondents' obligations under these Orders may be altered only by written approval of the Director.

IV. DEFINITIONS

Words used in these Orders shall have their ordinary meaning, except as defined in this Section or the relevant statute or regulation.

A. "Site" shall mean all areas within the property boundary of the Portsmouth Gaseous Diffusion Plant ("PORTS") and any other areas that received or potentially received or released "hazardous substances, pollutants, or contaminants" originating from PORTS as defined in the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended, ("CERCLA"), 42 U.S.C. section 9601, et seq.

B. "Hazardous Waste Management Unit" ("HWMU") shall mean a contiguous area of land on or in which hazardous waste is placed or the largest area in which there is significant likelihood of mixing hazardous waste constituents in the same area [40 CFR section 260.10; Ohio Administrative Code ("OAC") rule 3745-50-10].

C. "IGWMP" shall mean the Integrated Ground Water Monitoring Plan, as approved by Ohio EPA, and which is attached to these Orders as Attachment C.

D. "Party" shall mean DOE, Bechtel Jacobs Company or the Ohio Environmental Protection Agency ("Ohio EPA" or "OEPA"). "Parties" shall mean DOE, Bechtel Jacobs Company and Ohio EPA.

E. "Solid Waste Disposal Facility" ("SWDF") shall mean any site, location, tract of land, installation or building used for incineration, composing, sanitary landfilling, or other methods of disposal of solid wastes (OAC rule 3745-27-01(C)(11)).

F. "Consent Decree" shall mean the consent decree filed by DOE and the State of Ohio on September 1, 1989, in Civil Action Number C2-89-732, in United States District Court for the Southern District of Ohio, Eastern Division.

G. "Administrative Order by Consent" shall mean the administrative order by consent entered into by the DOE, Ohio EPA and U.S. EPA on August 12, 1997, for the purpose of defining oversight roles for Ohio EPA and U.S. EPA and certain performance obligations for DOE, and which replaced the earlier version of the ACO, as amended.

H. "Surveillance and Maintenance Plan" ("S&M Plan") shall mean the plan to be submitted and approved pursuant to Order number 16, below, which provides for post closure care and/or operation and maintenance of each of several units; following approval, the S&M Plan shall be incorporated by reference and attached to these Orders as Attachment D.

V. FINDINGS OF FACT

The Director of Environmental Protection hereby makes the following findings:

1. DOE owns PORTS, a uranium enrichment facility, located in Pike County, Ohio, approximately twenty (20) miles north of the City of Portsmouth. The current primary function of PORTS is the enrichment of uranium for use in fueling nuclear reactors. Pursuant to section 1403 (a) of the Energy Policy Act of 1992 (Public Law 102-486), DOE leases uranium enrichment facilities at PORTS to the United States Enrichment Corporation (USEC). Pursuant to the Energy Policy Act, including section 1403 (d), DOE has retained responsibility for certain cleanup activities with respect to conditions existing before July 1, 1993, the date that uranium enrichment operations at PORTS were assumed by USEC.

2. PORTS commenced operations in 1954. PORTS operations are located on a 15.1 square kilometer (3,714 acres) parcel of federally owned land. Several rural communities lie within a few kilometers of PORTS.

3. Bechtel Jacobs Company is a limited liability company, licensed to do business in the State of Ohio on December 24, 1997. Bechtel Jacobs Company has contracted with DOE to carry out certain day-to-day activities at PORTS, including certain cleanup activities.

4. The Respondents are each a "person" as defined in ORC section 3734.01(G) and Ohio Administrative Code ("OAC") rule 3745-50-10.

5. The Respondents generate or have generated "hazardous waste" as that term is defined in section 1003(5) of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act ("RCRA") as amended, 42 U.S.C. section 6903 (5) and in ORC section 3734.01 (J) and OAC rules 3745-50-10 and 3745-51-03.

6. The Respondents generate or have generated "solid waste" as that term is defined in ORC section 3734.01 (E) and OAC rule 3745-27-01.

7. The principal radioactive elements present in waste materials handled at the facility are uranium and technetium. The principal non-radioactive hazardous wastes known to be generated at PORTS are those exhibiting characteristics of ignitability, toxicity (TCLP) for chromium, lead, and cadmium, and various listed wastes including: spent halogenated solvents such as TCE; spent non-halogenated solvents; as well as small quantities of laboratory chemicals such as vanadium pentoxide, aniline, formaldehyde, formic acid, and lead acetate.

8. On August 18, 1980, DOE submitted a notification of hazardous waste activity at the facility as required by section 3010 (a) of RCRA, 42 U.S.C. section 6930 (a), and on July 12, 1984, DOE filed a RCRA Part A permit application as required by section 3005(a) of RCRA, 42 U.S.C. section 6925(a), to treat, store, and dispose of hazardous waste at the Facility. Subsequently, DOE filed a RCRA Part A permit application revision on September 9, 1988. OEPA transmitted PORTS' RCRA Part B Permit Application to the Ohio Hazardous Waste Facility Board on March 18, 1993, and the Board issued a permit to DOE, effective on August 21, 1995; the permit authorizes DOE to store certain hazardous and mixed wastes in two storage facilities {X-326 and X-7725} at PORTS. The permit does not address ground water monitoring requirements.

9. On June 30, 1989, Ohio EPA received final authorization from U.S. EPA to administer the hazardous waste program in Ohio; such authorization includes the authority to regulate the hazardous waste component of mixed waste. See 54 Fed. Reg. 27173. Ohio EPA's hazardous waste program authorization has since been expanded to include authorization to implement corrective action requirements under RCRA.

10. On September 1, 1989, DOE and the State of Ohio filed a Consent Decree, Civil Action

Number C2-89-732, in United States District Court for the Southern District of Ohio, Eastern Division ("Consent Decree"), for the purpose of addressing certain hazardous waste compliance issues at PORTS. The Consent Decree requires the performance of corrective actions at PORTS, in addition to other requirements.

11. On September 27, 1989, U.S. EPA and DOE entered into an Administrative Consent Order, U.S. EPA Docket Number V-W-9OR-03, for the performance of response action/corrective actions at PORTS.

12. In August of 1994, the 1989 Administrative Consent Order ("ACO, as amended") was amended to, among other things, include Ohio as a party for the purpose of recovering its oversight costs from U.S. DOE.

13. On August 2, 1995, Ohio EPA issued a letter which referenced a meeting in which DOE and Ohio EPA agreed to the integration of closure and corrective action/response action for certain HWMUs.

14. On October 4, 1995, DOE and Ohio EPA entered into Director's Final Findings and Orders which approved DOE's site treatment plan for all land disposal restricted hazardous wastes in storage at PORTS.

15. On August 12, 1997, the DOE, Ohio EPA, and U.S. EPA entered into the Administrative Order by Consent for the purpose of defining oversight roles for Ohio EPA and U.S. EPA and certain performance obligations for DOE, which replaced the earlier version of the ACO, as amended. Pursuant to this Administrative Order by Consent, Ohio EPA assumed the lead oversight role from U.S. EPA for all remedial and corrective action activities at PORTS.

16. The corrective action/response action process being conducted at PORTS employs a Quadrant approach, in which PORTS is divided into four Quadrants for the purposes of organizing and facilitating the corrective action/response action process. The Quadrants are based approximately on the direction of groundwater flow at PORTS.

17. Consistent with Section VII of the Consent Decree and the Administrative Order by Consent, Respondents have agreed to implement the corrective actions/response actions selected in the Decision Documents for each Quadrant.

18. Pursuant to the requirements of Sections VII and VIII of the Consent Decree and provisions of the Administrative Order by Consent, DOE is responsible for conducting certain ground water monitoring requirements at PORTS. Pursuant to requirements of Section V of the Consent Decree

and provisions of the Administrative Order by Consent, DOE conducts closure and post closure care of certain HWMUs and solid waste disposal facilities ("SWDF") at PORTS.

19. Attachment A, incorporated by reference herein, identifies those SWDFs and those HWMUs which will be subject to one or more exemptions pursuant to this Order. The exemptions facilitate the integration process which consists of deferring the timing and procedural requirements applicable to certain units, and includes the unification of all site-wide groundwater monitoring requirements.

20. The SWDFs and HWMUs identified in Attachment A are subject to requirements for closure, investigation and/or remediation pursuant to Section V and/or Section VII of the Consent Decree. The SWDFs and HWMUs identified in Attachment A are all "Waste Units" pursuant to Section 2.16 of the Consent Decree and as used in Section VII. of the Consent Decree.

21. The SWDFs and HWMUs identified in Attachment A are subject to schedules for closure, investigation and/or remediation pursuant to the Consent Decree. These schedules are based upon discussions between the Respondent DOE and Ohio EPA, and are subject to change pursuant to the procedures required by the Consent Decree. Incorporated by reference herein as Attachment B is the agreed upon schedule for all remaining remedial activities as it exists as of the effective date of these Orders, which was submitted by Respondents to Ohio EPA on December 5, 1998 and approved by Ohio EPA on December 11, 1998. Pursuant to Section VII of the Consent Decree, this schedule is fully enforceable under the Consent Decree. Remedial actions proposed in accordance with the Consent Decree are subject to a public comment period.

22. On January 27, 1999, Ohio EPA approved the Integrated Ground Water Monitoring Plan, ("IGWMP"), which is designed to integrate site-wide ground water monitoring activities at PORTS by encompassing all ground water monitoring requirements and the goals of multiple regulatory programs in order to maximize resources to support corrective action and to minimize the potential for conflicts in requirements between regulatory programs.

23. SWDFs X-749A, X-735 Industrial Solid Waste Landfill, and X-749S (also known as the Low Level Disposal Unit) completed certification of closure on June 7, 1994, November 6, 1998, and February 9, 1993, respectively, at which times the 30 year post closure care period began, in accordance with OAC rules 3745-27-14 or 3745-29-14 for each unit. Ohio EPA accepted the certification of closure for the referenced units on November 12, 1996, December 28, 1998, and March 8, 1993, respectively. SWDFs X-749A, X-735 Industrial Solid Waste Landfill, and X-749S are subject to the requirements of post closure plans submitted in accordance with OAC rules 3745-27-11 or 3745-29-11 and approved on April 9, 1992, January 23, 1998, and July 17, 1991, respectively.

24. OAC rule 3745-29-01(B) defines an "industrial solid waste landfill facility" as a sanitary landfill facility which exclusively disposes one or any combination of industrial solid wastes as defined in OAC rule 3745-29-01(A). OAC rule 3745-29-01(A) defines "industrial solid waste" as a type of solid waste generated by manufacturing or industrial operations. SWDFs X-749A and X-749S are sanitary landfill facilities where industrial solid wastes were disposed and, currently, are subject to OAC Chapter 3745-27.

25. Pursuant to ORC section 3734.02 (G) and OAC rule 3745-50-31, the Director may by order exempt any person generating, storing, treating, disposing of or transporting hazardous waste in such quantities or under such circumstances that, in the determination of the Director, are unlikely to adversely affect the public health or safety or the environment from any requirement to obtain a permit or license, comply with the manifest system or comply with other requirements of ORC chapter 3734.

26. The SWDFs listed in Attachment A are subject to the ground water monitoring requirements contained within OAC rules 3745-27-10 or 3745-29-10. Compliance with the ground water monitoring requirements outlined within the IGWMP, Attachment C, instead of with the requirements of OAC rules 3745-27-10(C)(10) or 3745-29-10(C)(10), for the SWDFs listed in Attachment A, is unlikely to adversely affect the public health or safety or the environment.

27. By letter dated January 26, 1999, Respondents submitted an application for the exemptions contained in these Orders.

28. If the Respondents conduct an RCRA/CERCLA integrated remediation process in accordance with the requirements and schedules contained in or referenced in these Orders, it is unlikely that public health or safety or the environment will be adversely affected within the meaning of ORC section 3734.02(G).

29. Where a variance to the rules promulgated under ORC Chapter 3734. is granted, the Director has determined that such an action is appropriate and reasonable to prevent the creation of a nuisance or a hazard to the public health or safety or the environment, and that the construction and operation of the solid waste facility in the manner allowed by the variance and any terms or conditions imposed as part of the variance will not create a nuisance or a hazard to the public health or safety or the environment.

exempted from 55-12 closure plan requirements w/13 closed underburn

VI. ORDERS

1. The Respondents shall implement the IGWMP, Attachment C, except that, to the extent

that the IGWMP requires tasks specific to radiological contamination, and/or tasks specific to off-site residential monitoring, such tasks shall not be specifically enforceable under this Order. Where a task involves both radiological contamination and non-radiological contamination, only the portions of the task involving non-radiological contamination shall be specifically enforceable through this Order. Implementation shall occur pursuant to Order 17, below.

2. The Respondents are hereby exempted from complying with the rules contained in OAC chapters 3745-65 and 3745-66 for the HWMUs listed in Attachment A, *provided*, that the Respondents shall comply with the substantive requirements of the rules contained in OAC chapters 3745-54 and 3745-55 for the HWMUs listed in Attachment A, through the remedial processes of Section VII of the Consent Decree, except as provided below.

3. The Respondents are hereby exempted from complying with the rules contained in OAC chapter 3745-27, for the X-749S SWDF, and for the X-749A Classified Materials Disposal Facility, *provided* that the Respondents comply with the substantive requirements of OAC Chapter 3745-29 for those units, except as provided below.

4. The Respondents are hereby exempted from complying with OAC rule 3745-29-10(C)(10) for the X-735S Industrial Solid Waste Landfill, and for the X-749A Classified Materials Disposal Facility.

5. The Respondents are hereby granted a variance for the X-749S Industrial Solid Waste Landfill, the X-749A Classified Materials Disposal Facility, and X-735 SWDF, from complying with the requirement contained in OAC rule 3745-29-14(A)(3) to submit a written summary to the appropriate Ohio EPA district office not later than fifteen days after the date of the inspection required by this rule, *provided* that Respondents submit the written summary otherwise required by this rule within fifteen days following the end of the calendar year quarter in which the inspection occurred.

6. The Respondents are hereby exempted from complying with OAC rule 3745-29-10 for the X-749S Industrial Solid Waste Landfill. The X-749S Industrial Solid Waste Landfill will be monitored together with the X-749N HWMU as a single groundwater monitoring unit in accordance with OAC rule 3745-54-99, except as provided below.

264.98 ? 98 ?

7. The Respondents are hereby exempted from complying with OAC rule 3745-54-98 for the X-735N Hazardous Waste Landfill. The X-735N Hazardous Waste Landfill will be monitored together with the X-735S Industrial Solid Waste Landfill as a single groundwater monitoring unit pursuant to the exemption in paragraph 4, above.

appendix 9

8. The Respondents are hereby exempted from complying with OAC rule 3745-54-99(G) for the following HWMUs: X-231B, X-701C, X-740, X-701B, X-230J7, X-616, X-735N, and X-749.

9. The Respondents are hereby exempted from complying with OAC rule 3745-55-02(C) for the following HWMUs: X-231B, X-701B, X-701C, X-230J7, X-616, X-740, X-735N and X-749.

10. The Respondents are hereby exempted from complying with OAC rule 3745-55-12(A)(1) for the following HWMUs: X-230J7, X-701C, X-744Y, X-231B, and X-701B, *provided* that the CMS/CMIs necessary for the completion of remediation which are required by the Consent Decree, are submitted by Respondents in accordance with the schedule approved pursuant to the Consent Decree.

11. The Respondents are hereby exempted from complying with OAC rule 3745-55-13 for the following HWMUs: X-230J7, X-701C, X-744Y, X-231B, and X-701B, *provided* that the Respondents implement the Corrective Measures Implementation Work Plan in accordance with the schedule approved pursuant to the Consent Decree.

12. The Respondents are hereby exempted from complying with OAC rule 3745-55-15 for the following HWMUs: X-230J7, X-701C, X-744Y, X-231B, and X-701B, *provided* that the Respondents submit the Corrective Measures Implementation Final Report in accordance with the schedule approved pursuant to the Consent Decree, and the Certification Report, contained therein, meets the requirements of closure certification.

13. The Respondents are hereby exempted from complying with OAC rule 3745-55-20 for the following HWMUs: X-749, X-231B, X-701C, X-701B, X-230J7, X-616 and X-744Y, *provided* that the Respondents submit an Operation & Maintenance Monitoring Final Report which meets the requirements of a post-closure certification.

14. The Respondents are hereby exempted from complying with OAC rule 3745-55-18(A) for the following HWMUs: X-231B, X-701C, X-701B, X-230J7, and X-744Y, *provided* that the Respondents submit the Corrective Measures Implementation Workplan, which includes the Operation & Maintenance Plan, in accordance with the schedule approved pursuant to the Consent Decree and for the HWMUs X-231B, X-701C, X-701B, X-230J7 and X-744Y the Operation & Maintenance Plan must include the substantive requirements contained in OAC rule 3745-55-18 (B) through (D).

15. The Respondents are hereby exempted from complying with OAC rule 3745-55-18(A)

for the following HWMUs: X-616, X-749N and X-735N.

16. a. No later than twenty (20) days after the effective date of this Order, Respondents shall submit a Surveillance and Maintenance Plan ("the S&M Plan") providing for post closure care and/or operation and maintenance (excluding groundwater monitoring requirements, which are provided in the IGWMP) of each of the following units: SWDFs X-749A, X-735S Industrial Solid Waste Landfill and X-749S (also known as the Low Level Disposal Unit), and HWMUs X-616, X749N, and X-735N. The S&M Plan shall meet the following standards:

i. For the SWDFs X-749A, X-735S Industrial Solid Waste Landfill and X-749S (also known as the Low Level Disposal Unit), the S&M Plan must include all the requirements for post closure stated in the closure/post closure plans which were approved for those units on April 9, 1992, January 23, 1998, and July 17, 1991, respectively.

ii. For HWMUs X-616, X749N, and X-735N the S&M Plan must include all the requirements for post closure stated in the closure/post closure plans which were approved for those units on August 13, 1992, July 14, 1989, and September 13, 1993, respectively.

iii. For any other unit Respondents choose to incorporate into the S&M Plan, the S&M Plan shall incorporate all post closure and/or operation and maintenance requirements which exist at the time of submittal of the S&M Plan.

b. Respondents' S&M Plan shall be subject to review and approval by Ohio EPA. If Ohio EPA provides Respondents with a written statement of deficiencies in the S&M Plan, Respondents shall submit to Ohio EPA, within thirty (30) days of receipt of the statement of deficiencies, a revised S&M Plan that satisfactorily addresses the stated deficiencies.

c. Ohio EPA may either approve the S&M Plan as submitted or as revised, or approve it with modifications. If Ohio EPA modifies the S&M Plan as submitted or revised, the modified plan shall become the approved S&M Plan. Upon approval, the S&M Plan shall be incorporated by reference into this Order as Attachment D.

d. Upon implementation of the IGWMP and S&M Plan as described in Order 17, below, Respondents' obligations under the previously approved closure plans or post closure care plans for the units specified in Attachment A are satisfied, and the closure plan or post closure care plan terminates.

17. Respondents shall commence implementation of the IGWMP and the S&M Plan together on April 1, 1999. If, for any reason, approval of the S&M plan by Ohio EPA has not been obtained by April 1, 1999, these Orders and all exemptions contained herein will terminate, and Respondents shall have no further obligation under these Orders.

VII. AMENDMENT OF ATTACHMENTS

1. Amendment of the IGWMP (Attachment C) or the S&M Plan (Attachment D):

a. The IGWMP or the S&M Plan may be amended by mutual, written agreement of the parties, according to the procedures described below.

b. In the event that Respondents identify a need to amend the approved IGWMP or approved S&M Plan, Respondents shall submit an amended plan to Ohio EPA. Upon receipt of an amended plan, Ohio EPA may either approve the amended plan, as submitted, or disapprove and provide comments describing changes required before approval. Upon approval by Ohio EPA of the amended plan, Respondents shall implement the approved plan in accordance with the schedule approved pursuant to the Consent Decree.

c. In the event that Ohio EPA identifies a need to amend the approved plan, Respondents shall, within twenty (20) days of receipt of written notice from Ohio EPA of the need to amend the approved plan, submit an amended plan proposal. Upon receipt of an amended groundwater monitoring plan, Ohio EPA may either approve the amended plan, as submitted, or disapprove and provide comments describing changes required before approval. Upon approval of the amended plan by Ohio EPA, Respondents shall implement the approved plan in accordance with the schedule approved pursuant to the Consent Decree.

VIII. PROJECT MANAGERS

Ohio EPA's Project Manager is Maria Galanti of Ohio EPA's Southeast District Office. Respondent DOE's Project Manager is Melda Rafferty. Respondent Bechtel Jacobs Company's Project Manager is Don J. Wilkes. A Party may change its designated Project Manager by notifying the other Parties, in writing, ten (10) business days before the change, if possible.

Each Project Manager shall be the primary contact regarding the implementation of these Orders. The Project Managers shall meet periodically, as appropriate, to discuss progress and problems

regarding the implementation of these Orders.

IX. NOTICE

All documents to be submitted pursuant to these Orders shall be submitted to the following persons at the following addresses:

Ohio EPA:

Ohio Environmental Protection Agency
Southeast District Office
Division of Emergency & Remedial Response
Attn: Project Manager
2195 Front Street
Logan, Ohio 43138

and

Ohio Environmental Protection Agency
Division of Hazardous Waste Management
Attn: Manager, Compliance Assurance Section
Lazarus Government Center
P.O. Box 1049
Columbus, Ohio 43216-1049

Bechtel Jacobs Company:

Bechtel Jacobs Company LLC
Portsmouth Gaseous Diffusion Plant
P.O. Box 900
Piketon, Ohio 45661-0628
Attn: Don J. Wilkes, Bechtell Jacobs Company Project Manager for Environment Restoration

DOE:

U.S. DOE, Portsmouth Gaseous Diffusion Plant
Attn: Melda Rafferty
P.O. Box 700

Piketon, Ohio 45661-0700

or to such persons and addresses as may hereafter be otherwise specified in writing.

X. OTHER APPLICABLE LAWS

Nothing in these Orders shall be construed as waiving or compromising in any way the applicability and enforcement of any other statutes or regulations' applicability to the Respondents' activities at the Site. Ohio EPA reserves all rights and privileges except as specified herein. Respondents reserve all defenses they may have.

XI. RESERVATION OF RIGHTS

Nothing contained in these Orders shall be construed as restricting any rights or obligations contained in the Administrative Order by Consent and/or the Consent Decree. Nothing contained herein shall be construed to prevent the Ohio EPA from seeking legal or equitable relief to enforce the terms of these Orders or from taking other administrative, legal or equitable action, as deemed appropriate and necessary, including the revocation of exemptions, as necessary, and including seeking penalties against Respondents for noncompliance with these Orders. Nothing contained herein shall be construed to prevent Ohio EPA from exercising its lawful authority to require the Respondents to perform additional activities at the Site, pursuant to ORC chapter 3734 or any other applicable law in the future. If any section or subsection of the IGWMP, performance of which is a condition of an exemption, is amended by mutual agreement pursuant to Section VII., the Director reserves the right to revoke the exemption, unless he determines that such amendment is unlikely to adversely affect the public health or safety or the environment.

Nothing herein shall restrict the right of Respondents to raise any administrative, legal or equitable claim or defense with respect to such further actions that Ohio EPA may seek to require of the Respondents. Nothing in these Orders shall be construed as a waiver of DOE's jurisdiction over source, by-product, or special nuclear materials under the Atomic Energy Act, 42 U.S.C. section 2201, et seq.. Nothing in the preceding sentence alters Respondents' duty to comply with these Orders.

The Director reserves the right to revoke these Orders, or any portion hereof, upon a determination by Ohio EPA that such revocation is necessary to protect human health or safety or the environment. The Respondents reserve the right to seek administrative or judicial review of any such revocation.

It is Ohio EPA's position that the Anti-Deficiency Act, 31 U.S.C. section 1341, as amended, does not apply to any obligations set forth in these Orders, and that obligations herein are not affected by Respondent DOE's failure to obtain adequate funds or appropriations from Congress. It is Respondents' position that the obligations set forth in these Orders are subject to the provisions of the Anti-Deficiency Act and are subject to the availability of funding. The Parties agree that it is premature to raise and resolve the validity of such positions at this time.

XII. OTHER CLAIMS

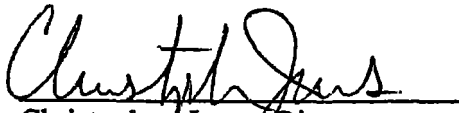
Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any persons, firm, partnership or Corporation, not a signatory to these Orders, for any liability arising out of or relating to the operation of the Respondent DOE's Site.

XIII. SIGNATORIES

Each undersigned representative of a Party signatory to these Orders certifies that he or she is fully authorized to enter into the terms and conditions of these Orders and to legally bind such party to this document.

IT IS SO ORDERED:

Ohio Environmental Protection Agency

By:  3/17/99

Christopher Jones, Director — Date

XV. WAIVER

The Respondents agree that these Orders are lawful and reasonable. The Respondents, by acceptance of these Orders, agree to comply with all conditions of these Orders and acknowledge the Respondents' failure to do so may result in further legal action by Ohio EPA.

The Respondents hereby waive the right to appeal or otherwise challenge the issuance of these Orders. Nothing in these Orders shall affect the Respondents' rights to seek administrative or judicial review of other final actions by the Director pursuant to ORC section 3745.04 or other applicable law.

Ohio EPA and the Respondents agree that in the event that these Orders are appealed by any other party to the Environmental Review Appeals Commission; or any court, the Respondents retain the right to intervene and participate in such appeal in support of these Orders. In such event, the Respondents shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated, or modified.

IT IS SO AGREED:

U.S. Department of Energy:

By: Lester K. Price Date: 2/23/99

Executive Director, Office of Environmental Management, ORO
Title

Bechtel Jacobs Company LLC:

By: Joseph F. Nemec Date: 2/5/99

Joseph F. Nemec
President
Title

Ohio Environmental Protection Agency:

Christopher Jones Date: 3/17/99

Christopher Jones, Director

ATTACHMENT A

Unit Name	Description	Quadrant	Unit Type for Groundwater Monitoring	Unit Type for S&M Activities
X-231B*	Oil Biodegradation Plot	Quadrant I	HWMU	Corrective Action
X-744Y*	Storage Yard	Quadrant II	HWMU	Corrective Action
X-230J7*	Holding Pond	Quadrant II	HWMU	Corrective Action
X-701B*	Holding Pond	Quadrant II	HWMU	Corrective Action
X-701C*	Neutralization Pit	Quadrant II	HWMU	Corrective Action
X-740*a	Waste Oil Handling Facility	Quadrant III	HWMU\Corrective Action	HWMU (soils only)
X-616**	Chromium Sludge Lagoon	Quadrant III	HWMU	HWMU
X-749 N**	Landfill	Quadrant I	HWMU	HWMU
X-749 S***	Landfill	Quadrant I	HWMU	SWDF
X-735 N**	Landfill	Quadrant IV	SWDF	HWMU
X-735 S***	Landfill	Quadrant IV	SWDF	SWDF
X-749A***	Landfill	Quadrant I	SWDF	SWDF

* HWMUs to be addressed under the RCRA Corrective Action\CERCLA Process. These units are addressed under the schedule for completion of remedial activity at the site.

*a HWMU closed in accordance with approved closure plan for soils only. Groundwater to be addressed under RCRA Corrective Action\CERCLA Process.

** HWMUs closed in accordance with approved closure plans and are considered to be in post closure groundwater monitoring. Continued groundwater monitoring to be conducted as part of the IGWMP.

*** SWDF closed in accordance with approved closure plans. Continued groundwater monitoring to be conducted as part of the IGWMP.