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

JUN 13 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7663 7138
RETURN RECEIPT REQUESTED

Ms. Diana Starkweather
Environmental Engineer
SunCoke Energy Haverhill Operations
2446 Gallia Pike
Franklin Furnace, Ohio 45629

Re: Notice of Violation
Compliance Evaluation Inspection
EPA I.D. No.: OHR000143511

Dear Ms. Starkweather:

On May 13, 2014, representatives of the U.S. Environmental Protection Agency and the Ohio Environmental Protection Agency inspected the SunCoke Energy Haverhill Operations (hereinafter "SunCoke," "facility," or "you") located in Franklin Furnace, Ohio. The purpose of the inspection was to evaluate SunCoke's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6901 *et seq*., and it's implementing regulations; specifically, those regulations related to the generation, treatment and storage of hazardous waste. We have enclosed a copy of the inspection report and checklist for your reference.

Based on information provided by SunCoke personnel, a review of records, and physical observations made by the inspectors at the time of the investigation, EPA has determined that SunCoke is engaged in the storage of hazardous waste without a permit, and is in violation of certain requirements of the Ohio Administrative Code (OAC) and the United States Code of Federal Regulations (CFR). To be eligible for the exemption from having a hazardous waste storage permit, SunCoke must be in compliance with the conditions of OAC 3745-52-34(A) and (C) [40 CFR § 262.34(a) and (c)]. We find that SunCoke is in noncompliance with the following conditions for a hazardous waste storage permit exemption and is in violation of the following requirements:

1. To avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste who accumulates hazardous waste in containers shall keep such containers closed during storage, except when it is necessary to add or remove waste. See OAC 3745-52-34(A) (1) (a); 3745-66-73(A) [40 CFR §§ 262.34(a) (1) (i); 265.173(a)].

At the time of inspection, SunCoke was storing hazardous waste wash water generated from its heat recovery steam generators in four frac tanks in a storage yard near its used oil storage area. Two of the four frac tanks had lids that were open to the environment, but were later closed during the inspection. Thus, no further action is necessary to comply with this requirement.

2. A large quantity generator that accumulates hazardous waste on-site for 90 days or less and who does not meet the conditions for a permit exemption of OAC rules 3745-52-34(A) [40 CFR § 262.34(a)], is an operator of a hazardous waste storage facility, and is required to obtain an Ohio hazardous waste storage permit. See OAC rules 3745-52-34(A), 3745-50-41(A), 3745-50-45(A) [40 CFR §§ 270.1(c); 270.10(a)].

   On failing to comply with the conditions for a permit exemption referenced in item 1 above, SunCoke's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements of OAC rules 3745-52-34(A), 3745-50-41(A), and 3745-50-45(A) [40 CFR §§ 270.1(c); 270.10(a)]. During the inspection, the issue in item 1 was remedied. Thus, no further action is necessary to comply with this requirement.

Under section 3008(a) of RCRA, 42 U.S.C. § 6928(a), 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. Since SunCoke established compliance with the above-referenced conditions for a hazardous waste permit exemption during the inspection, EPA 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.

If you have any questions or concerns regarding this matter, please contact Brian Kennedy, of my staff, at (312) 353-4383.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Vicky German, OEPA (vicky.german@epa.ohio.gov)
Bruce McCoy, OEPA (bruce.mccoy@epa.ohio.gov)

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 5, Land and Chemicals Division
RCRA Branch, LR-8J
77 West Jackson Boulevard
Chicago, Illinois 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSPECTION DATE:	May 13, 2014
SITE NAME:	SunCoke Energy Haverhill Operations
ADDRESS:	2446 Gallia Pike Franklin Furnace, Ohio 45629
EPA ID NUMBER:	OHR000143511
GENERATOR STATUS:	Large Quantity Generator
NAICS CODE:	324199 All Other Petroleum and Coal Products Manufacturing
FACILITY CONTACT:	Diana Starkweather Environmental Engineer
EPA INSPECTOR:	Brian Kennedy Environmental Engineer Compliance Section 2 RCRA Branch Land and Chemicals Division

PREPARED BY: Brian Kennedy — **Brian Kennedy** — 5/28/2014 — **Date**

ACCEPTED BY: **Julie Morris**, **Chief, Compliance Section 2** — 6/3/14 — **Date**

Purpose of Inspection

An unannounced Compliance Evaluation Inspection (CEI) of SunCoke Energy Haverhill Operations (hereinafter "SunCoke" or "facility") located at 2446 Gallia Pike, Franklin Furnace, Ohio took place on May 13, 2014. The CEI was conducted by U.S. Environmental Protection Agency and Ohio Environmental Protection Agency (OEPA) personnel and was an evaluation of the facility's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA) and its implementing regulations found in the Ohio Administrative Code and the Code of Federal Regulations. More specifically, the CEI was an evaluation of SunCoke's compliance with the regulations governing large quantity generators of hazardous waste.

Participants

The following persons were present for part or all of the inspection:

John Essman – General Manager	SunCoke
Pat Nigl – Operations Manager	SunCoke
Stefan Greene – Safety and Training Coordinator	SunCoke
Diana Starkweather – Environmental Engineer	SunCoke
Vicky German – Environmental Scientist	OEPA
Brian Kennedy – Environmental Engineer	U.S. EPA

Introduction

I arrived on site with Vicky German of the OEPA at 9:30 AM EST. We signed in at the guard station at the facility entrance and proceeded to SunCoke's main office. Soon afterward, we were introduced to Mr. John Essman, SunCoke's General Manager, and Pat Nigl, SunCoke's Operations Manager. We proceeded to a nearby conference room where I presented Mr. Essman and Mr. Nigl my enforcement officer credentials and business card. I described the purpose of the U.S. EPA-lead RCRA inspection and the process by which I would conduct the inspection, including a facility walk-through which would include photographs of hazardous waste storage areas, as well as a review of SunCoke records pertaining to hazardous waste. Mr. Essman stated that Katherine Laird, SunCoke's regional Environmental Manager, was out of town the day of inspection. He stated that Diana Starkweather, the facility's Environmental Engineer, was currently in training in Columbus but would arrive at the facility later that day.

I provided Mr. Essman the EPA Small Business Resources and Pollution Prevention information sheets and informed him of the right to make a confidential business information claim over any information collected during the inspection.

Site Description

The following information about SunCoke is based on personal observations of the EPA inspector and on representations made during the inspection by facility personnel identified above or within the text unless otherwise specified.

The SunCoke facility located at 2446 Gallia Pike in Franklin Furnace, Ohio specializes in the manufacture of metallurgical-grade coke for steelmaking applications. The facility is divided into two main coke oven batteries known as Phase 1 and Phase 2, each with 100 ovens. The Phase 1 battery was completed in 2005, and Phase 2 completed in 2008. Combined, Phase 1 and Phase 2 produce 1.1 million tons of coke on an annual basis. The SunCoke process is known as non-recovery coke making, in which the compounds that volatilize off the coal in the ovens are combusted for heat recovery and energy production and processed through pollution control equipment. This is in contrast to by-product coke making, in which volatilized compounds are refined and utilized to produce a variety of chemical products. SunCoke currently has around 200 employees, 40 of which are regular contractors, and the facility operates on a 24/7 basis.

Currently, SunCoke produces coke blends for two primary customers, AK Steel and Arcelor Mittal. SunCoke receives custom coal blends for each customer by rail on a daily basis. The coal is unloaded into designated storage piles and conveyed to a crusher. After being crushed to the desired size, the coal is placed temporarily in a storage dome. From there, the coal is loaded onto a pusher charger machine which transfers the coal by rail to the selected oven in the Phase 1 or Phase 2 battery. The pusher charger machine then loads the coal into the coke oven in a process known as "charging." The oven, which remains heated from the previous batch, immediately begins heating the coal into coke. The coal will stay in the oven for 48 hours at 2,500°F.

Inside the coke oven, volatilized compounds from the coal are partially combusted, generating additional heat for the coke process. The partially combusted gases are then drawn into a chamber underneath the oven via downcomers along the oven sidewalls. In this chamber, known as the sole flue, secondary air is added via sole flue dampers and the gases move along a back-and-forth pattern beneath the oven floor. This fully combusts the volatile compounds while generating additional heat for the oven above. The fully combusted gases are then drawn upwards through the oven sidewalls and into the flue gas collection system, a large duct system which transfers flue gas from each oven to one of 10 heat recovery steam generators (HRSG). Both Phase 1 and Phase 2 have five HRSGs. Phase 1 HRSGs generate steam for use in a neighboring chemical plant. Phase 2 HRSGs generate steam which is sent to an on-site turbine building, the "Power Island." The Power Island generates electricity which is then sold to the local grid.

After passing through the HRSGs, the flue gas is drawn into a flue gas desulfurization (FGD) unit, where water and lime are reacted with the flue gas in a spray dryer. The treated gas is sent through a series of baghouses to collect particulate matter and then emitted through a main stack. Baghouse dust collected and stored in a nearby silo. Phase 1 and Phase 2 each have a FGD unit. Each FGD has an induced draft fan that maintains a negative pressure inside each coke oven and pulls the flue gas into the HRSGs. The induced draft fans also pull in secondary air through the sole flue dampers to fully combust the volatile compounds in the flue gas.

After the 48-hour coking cycle, the oven is opened on both ends and the coke is pushed (via the charging side of the oven) onto a flat push hot car on the other side of the oven. The flat push hot car transfers the coke by rail to a quench tower, where the coke is pushed onto the quench tower wharf. On the wharf, 4,000-5,000 gallons of water are poured over the coke batch to cool it down for further processing. Most of the water evaporates during quenching, but any remaining liquid

water is collected into nearby clear wells and eventually reused. The coke is dumped off the wharf and conveyed to the coke processing tower, where it is sorted by size and stored prior to shipment.

At the time of the inspection, SunCoke was undergoing a 15 day planned outage to assist in repairs of the Phase 1 FGD unit and to replace the economizers in several of the Phase 1 HRSGs. As a result of a 2013 Consent Decree with U.S. EPA, SunCoke is also constructing new redundant HRSGs, one for Phase 1 and another Phase 2, as well as bypass flue gas duct connections to the new HRSGs. This will allow SunCoke to conduct maintenance on existing HRSGs while minimizing the emissions of untreated flue gas during unplanned outages. Because of the planned outage, the Phase 1 HRSGs were not operational and the Phase 1 emergency vent stacks were open (flue gas not processed through a HRSG is too hot for treatment in a FGD, and must be vented in the emergency stacks).

Because SunCoke conducts non-recovery coke making, it does not generate the K-listed hazardous wastes typically associated with by-product coke making (K060, K087, K141-K145, K147 and K148). The largest hazardous waste stream generated by SunCoke consists of waste cleaning water and waste fly ash from its 10 HRSG boilers, as well as scrap HRSG boiler tubing and economizer components. SunCoke has characterized each of these materials as D004, D006, D007 and D008 hazardous waste. Smaller hazardous waste streams include waste aerosol cans (D001, D035, D039 and D040) and waste paints (D001). SunCoke has a 90-day hazardous waste storage pad adjacent to the Power Island building, as well as several satellite accumulation areas around the facility. SunCoke contracts Heritage Environmental Services to remove its hazardous waste.

SunCoke generates used oil from a variety of facility operations and maintains a used oil storage area northwest of the main administrative office, adjacent to several chemical storage trailers. Used oil is stored in a small tank as well as 55 gallon drums. SunCoke collects universal waste light bulbs and batteries in a small storage area in a warehouse north of the administrative office, as well as several satellite buckets to collect batteries generated around the facility. Heritage Environmental Services also transports SunCoke's used oil and universal wastes.

Most SunCoke employees utilize two-way handheld radios to communicate while around the facility. The facility is equipped with fire hydrants and the local fire department makes regular visits. Spill kits are maintained around areas of liquid waste storage, including the 90-day hazardous waste storage pad and the used oil storage area, and fire extinguishers are located in all production areas and inspected on a monthly basis.

Facility Walk-Through

Prior to entering the main SunCoke production areas, Mr. Stefan Greene, SunCoke's Safety and Training Coordinator, provided Ms. German and myself a presentation on facility safety requirements including personal protective equipment and general safety practices.

Mr. Nigl led Ms. German and myself through the facility. The walk-through began northwest of the administrative offices at a chemical and used oil storage area. SunCoke maintained two chemical storage trailers and several totes of hydraulic oils in this area. Mr. Nigl opened one of

the storage trailers. There was no waste in the trailer, only product chemicals and a spill kit. East of the storage trailers was the used oil storage area, a covered concrete pad with several 55 gallon drums of used oil and non-hazardous wastes and a used oil tank in secondary containment. The used oil tank was labeled "Used Oil" but there was free liquid, what appeared to be water and oil, in the secondary containment (See Photos 1 and 2 in Attachment A: Inspection Photographs). Several 55 gallon drums were labeled as "Used Oil" (Photo 3). I observed several additional waste drums labeled as "Main Stack Clean Out" and "Used Sublime" (Photos 4 and 5). Several of these drums had non-hazardous waste labels on them. Mr. Nigl stated the "Main Stack Clean Out" drum likely contained the debris that collects in the FGD stack during normal operations. I also observed several totes that appeared to contain used oil (Photo 6), although it was later clarified these totes contained product oil. Another tote labeled as non-hazardous waste was marked as "Dust Treat" (Photo 7). Mr. Nigl said this was spray water used to control dust during the coal unloading process.

The walk-through continued east of the used oil storage area to several portable "frac" tanks which held HRSG wash water that was generated during the current outage (Photo 8). There were five frac tanks in the area, but only four held the hazardous waste wash water. The fifth frac tank was appeared to be empty. The four frac tanks storing the HRSG wash water were double-walled and labeled as hazardous waste (Photos 9-12). The oldest tank was dated 4/4/2014. I climbed to the top of one frac tank. One of its lids was open (Photos 13 and 14). I could see a lid on the top of another frac tank was also open. I asked Mr. Nigl why the lids were open, and he radioed another worker to close the frac tanks. Near the frac tanks was a large roll-off box that held hazardous waste HRSG ash. The roll-off box was covered with a tarp and labeled as hazardous waste.

Mr. Nigl led us east along the north side of the Phase 1 battery. He pointed out a reservoir pond, which stores Ohio River water prior to use in the quench towers. He briefly explained the coal unloading process area, where railcar arrives on a daily basis to deliver specialized coal blends for both AK Steel and Arcelor Mittal. These blends are segregated into separate piles before being crushed and stored in the storage dome. We proceeded around the east side of Phase 1 and Mr. Nigl pointed out the coke screening area and a large conveyor system leading from the quench towers

The inspection continued to the HRSG #1, the first HRSG of the Phase 1 battery. The entire unit was raised on steel beams and underneath was a large bermed concrete pad (Photos 15 and 16). Mr. Nigl explained the HRSG wash out process, and that waste waters collect in the concrete pad and drain into a below-grade sump (Photo 17). The HRSG wash water is then pumped out of the containment via tanker truck and transferred to the frac tanks for storage. At the HRSG #2, the concrete containment was collecting liquid. Mr. Nigl said the liquid was boiler feed water, and pointed out a leak above the containment area (Photo 18). Due to the outage, none of the Phase 1 HRSGs (HRSG #1-#5) were operational at the time of the inspection.

The walk-through continued west along the south side of Phase 1. Mr. Nigl pointed out the construction site of the new redundant HRSG for Phase 1, as well the site of the new bypass flue gas duct that would connect to it. At the FGD #1, Mr. Nigl led us the baghouse room which collects particulate matter from the spray dryer (Photo 19). Each baghouse leads to a common

tunnel to collect the dust in a nearby silo, which can be emptied into a dump truck (Photo 20). I observed an in-ground pit near the FGD #1 filled with water (Photo 21). Mr. Nigl said it was a settling pit and recycled water used by the FGD.

Mr. Nigl led us to the Phase 1 quench tower. He pointed out recently quenched coke that was being loaded off the quench tower wharf and on to the conveyor system. On the other side of the tower, he explained the clear well water pits, where any excess quench water is collected and eventually pumped for reuse. Near the water pits was an excavator that is used to collect any coke that may accumulate on the pit bottoms.

At the Power Island turbine building, Diana Starkweather, SunCoke's Environmental Engineer, joined the inspection. Inside the Power Island building was a hazardous waste satellite accumulation area. There was a drum of waste aerosol cans labeled hazardous waste (Photo 22). Nearby was a bucket that contained universal waste batteries. The bucket was labeled and dated 4/18/2014 (Photo 23).

Ms. Starkweather led us outside the Power Island building to SunCoke's 90-day hazardous waste storage pad, a sloped concrete pad designed to collect any spills or free liquids. On the pad were six large economizer units that had recently been removed from several HRSGs (Photo 24). Typically, the economizers are cleaned and the waste is collected as HRSG wash water or ash. However, SunCoke had chosen to store the entire economizer units as hazardous waste and plans to ship them off to be dismantled and then disposed of as solid hazardous waste (with the same waste codes as HRSG wash water or ash). Each economizer unit was labeled as hazardous waste and had been removed within the previous month (Photo 25 and 26). Adjacent to the 90-day pad was a roll-off box labeled as hazardous waste. The box contained scrap HRSG boiler tubes contaminated with hazardous waste ash and was dated 4/4/2014 (Photo 27). Ms. Starkweather stated the frac tanks observed earlier in the walk-through are usually stored on the 90-day pad, but the outage and heavy construction activity was generating more hazardous waste than normal, and the frac tanks were moved to allow space for the economizers.

The walk-through continued to the FGD #2, which was operational at the time of inspection, and to the construction site of the second redundant HRSG for the Phase 2 battery. Ms. Starkweather led us to SunCoke's general maintenance building west of the administrative offices. There were several parts washers in the area, but Ms. Starkweather did not believe the parts washers used any solvents that were characterized as hazardous wastes. There was a hazardous waste satellite accumulation area in the maintenance building which contained a 55 gallon drum of waste aerosol cans (Photo 28). The drum was closed and labeled hazardous waste. There was also universal waste battery bucket near the drum that was dated 4/17/2014.

The inspection ended in SunCoke's general storage warehouse, a building the lies just north of the administrative offices. Inside the warehouse was SunCoke's universal waste storage area. There were three boxes of universal waste light bulbs in the area (Photos 29 and 30). The bulbs were inside tear-resistant bags and placed in boxes that were properly labeled.

Record Review

After the walk-through, I asked Ms. Starkweather for the following documents to review:

- SunCoke's 2013 Biennial Report
- Hazardous waste manifests for the previous three years
- Waste characterization and determination records for SunCoke's waste streams
- A copy of SunCoke's hazardous waste contingency plan
- Hazardous waste training records for applicable SunCoke employees
- Hazardous waste storage area inspection logs

Ms. Starkweather presented a copy of the 2013 Biennial Report. SunCoke's three largest waste streams included HRSG wash water, HRSG ash coated boiler tubes, and spent aerosol cans. Both the HRSG wash water and boiler tubes were given D004, D006, D007 and D008 waste codes.

I reviewed SunCoke's weekly hazardous waste storage area inspection logs for 2014, 2013, 2012 and 2011. SunCoke had developed a custom inspection checklist for its 90-day hazardous waste storage pad to include drums, roll-off bins and frac tanks. The most recent inspection log, dated 5/12/2014, noted the four frac tanks and one roll-off bin of HRSG wastes that were observed during the inspection. It also noted the presence of the six economizers on 90-day pad. A copy of SunCoke's recent inspection log is in Attachment B.

SunCoke's hazardous waste manifests for 2014, 2013, and 2012 displayed the regular shipment of HRSG wash water, ash, and scrap boiler tubing, as well as aerosol cans and small amounts of waste paint. All hazardous waste is transferred to Heritage Environmental Service's facility in Indianapolis. A sample manifest from August 2013 displaying the shipment of HRSG ash is in Attachment C. Maintained with the hazardous waste manifests were Heritage bills of lading that displayed the shipment of non-hazardous universal waste lamps and batteries and used oil, as well as used personal protective equipment.

I reviewed SunCoke's waste characterization records for the HRSG wash water and ash and boiler tubes, as well as a more recent profile for the HRSG economizers. These waste streams all shared the same D004, D006, D007, and D008 waste codes. There were additional records for sulfuric acid, which is used infrequently on-site, and spent aerosols, which were given D001, D035, D039 and D040 waste codes. SunCoke also maintains the initial land disposal restriction notification forms with its waste characterization records. A sample 2011 laboratory record for HRSG wash water is in Attachment D.

Ms. Starkweather presented a copy of SunCoke's contingency plan, as well as several of its appendices. The plan made note that it was submitted to the local authorities. The primary emergency coordinator was listed as Diana Starkweather, and the alternate coordinator as Rich Lykins, SunCoke's Safety Manager. An evacuation plan and a list of emergency equipment, as well as its location and use, were also included. The plan also includes a description of SunCoke's RCRA training program and details the training provided upon initial hire and on an annual basis. SunCoke personnel training records were available for the previous three years, and displayed the hazardous waste management content of the training as well as example tests

completed by employees. A copy of SunCoke's hazardous waste contingency plan is available in Attachment E.

Closing Conference

I summarized my review of the site to Ms. Starkweather and Mr. Essman. I mentioned the used oil / water mixture that had accumulated in the secondary containment of the used oil storage tank. I also mentioned some of the totes observed near the chemical storage trailers appeared to be used oil but were not labeled. I showed Ms. Starkweather the photos of the totes, and she stated that much of the virgin hydraulic oil used on site has a natural dark color, and that used oil is only managed on the covered concrete pad. Ms. German and I noted the HRSG wash water frac tanks were managed by SunCoke as hazardous waste containers, and as a result, the container lids must be closed at all times when waste is neither being added or removed.

SunCoke declined to make confidential business information claim during the inspection.

The inspection ended around 3:30 PM.

Inspection Follow-Up

On May 14, 2014, Ms. Starkweather requested to see the photographs taken during the inspection because they might contain confidential business information. On May 15, I sent Ms. Starkweather the inspection photographs. Ms. Starkweather then stated the photographs did not contain any confidential business information.

On May 21, 2014, I sent Ms. Starkweather an email containing several follow-up questions about SunCoke's production process and waste management procedures. On May 28, 2014, Ms. Starkweather provided additional information about SunCoke's procedures and provided a waste profile for the FGD baghouse dust (Attachment F).

Attachments

A. Inspection Photographs
B. Waste Storage Inspection Log
C. Sample Hazardous Waste Manifest
D. HRSG Wash Water Waste Profile
E. Hazardous Waste Contingency Plan
F. FGD Baghouse Dust Profile
G. Inspection Checklist

ATTACHMENT A: Inspection Photographs

Photographs were taken by Brian Kennedy using a Canon PowerShot A2400 IS Digital Camera.

Photo 1: A used oil storage tank near SunCoke's chemical storage trailer. Note the liquid in the secondary containment.

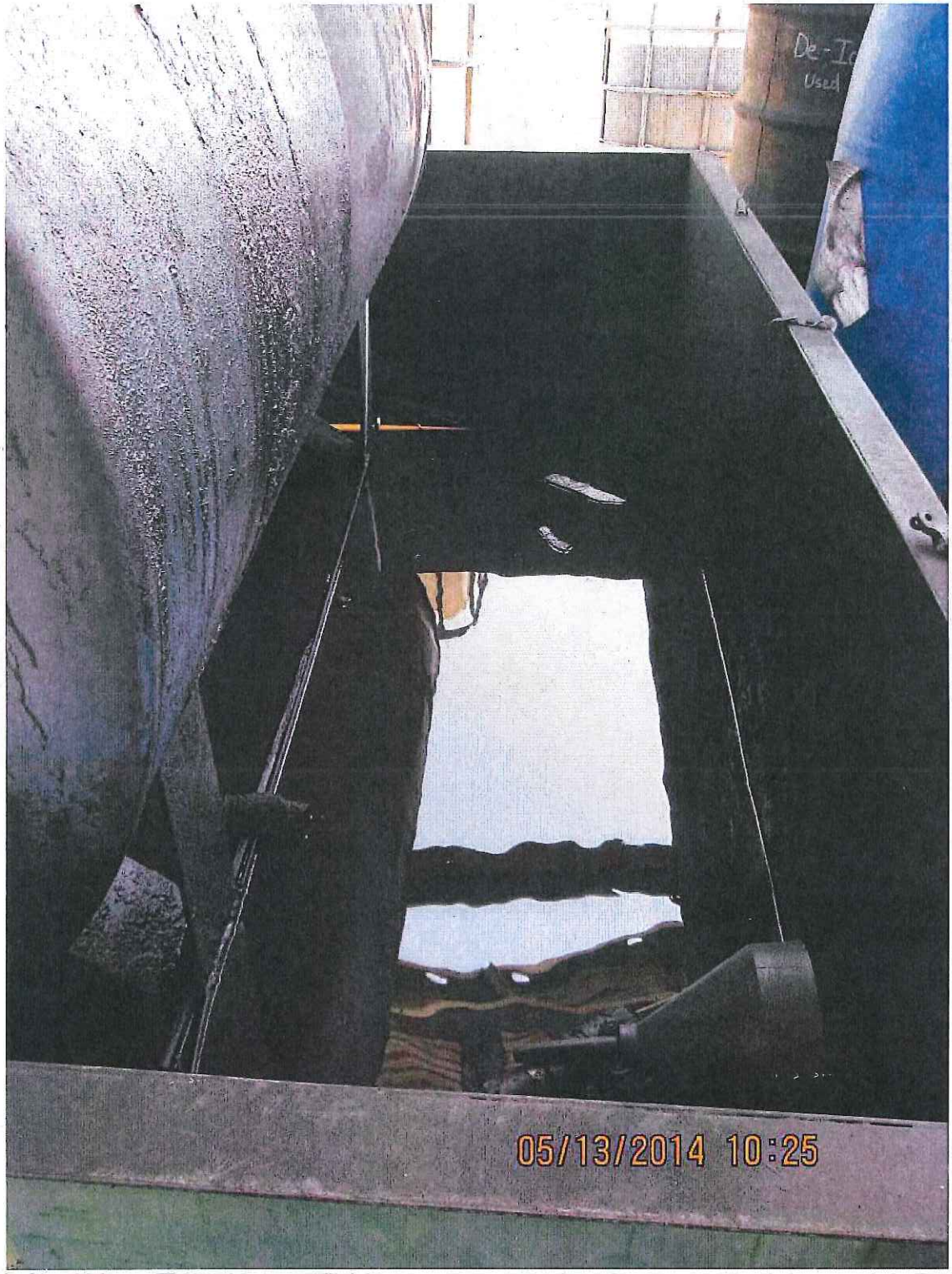

Photo 2: A mixture of what appeared to be used oil and water in the secondary containment of SunCoke's used oil storage tank.

Photo 3: Additional used oil drums in SunCoke's used oil storage area.

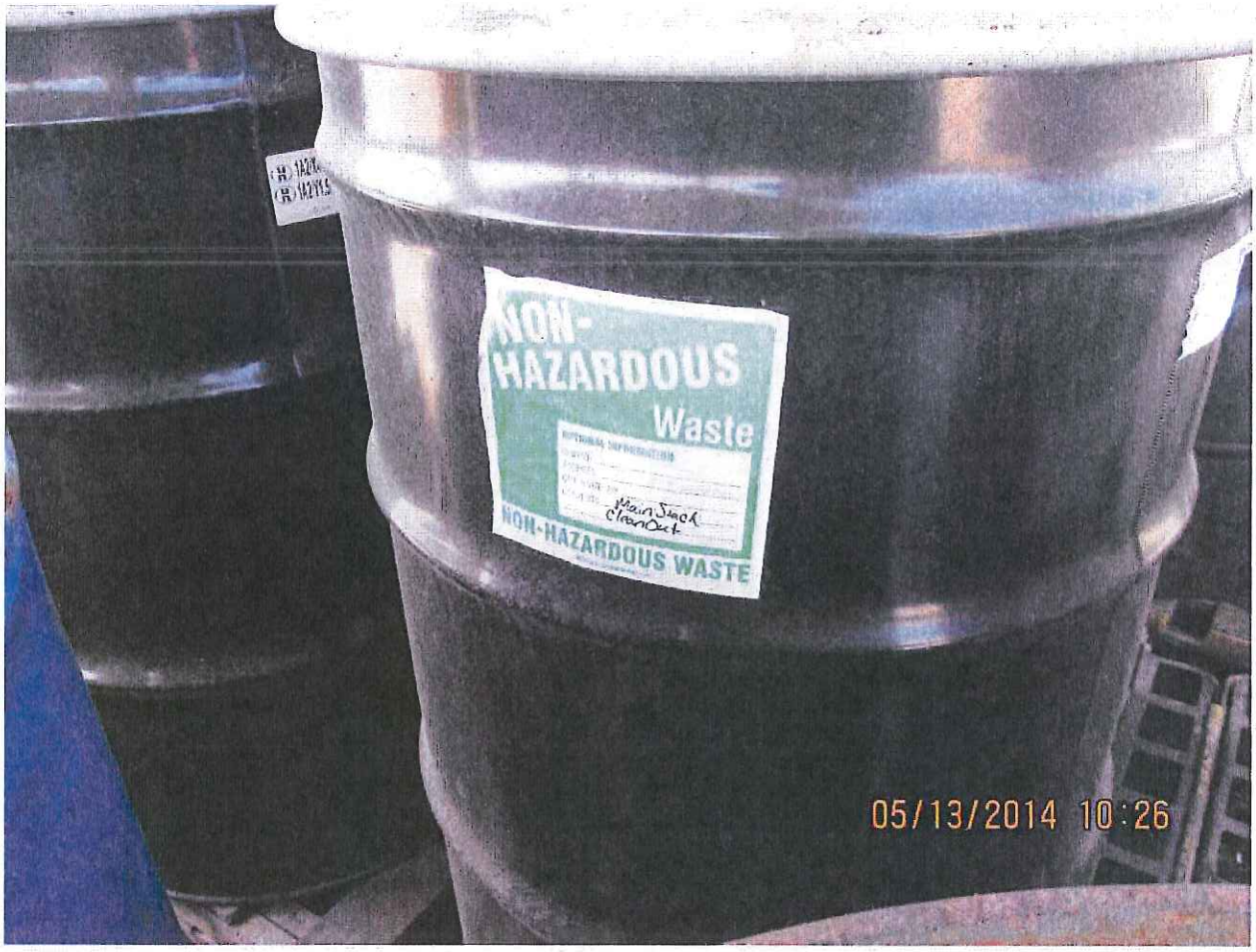

Photo 4: A drum of non-hazardous "Main Stack Clean Out" material. Mr. Nigl said the material was likely debris that had accumulated in the bottom of the FGD stacks.

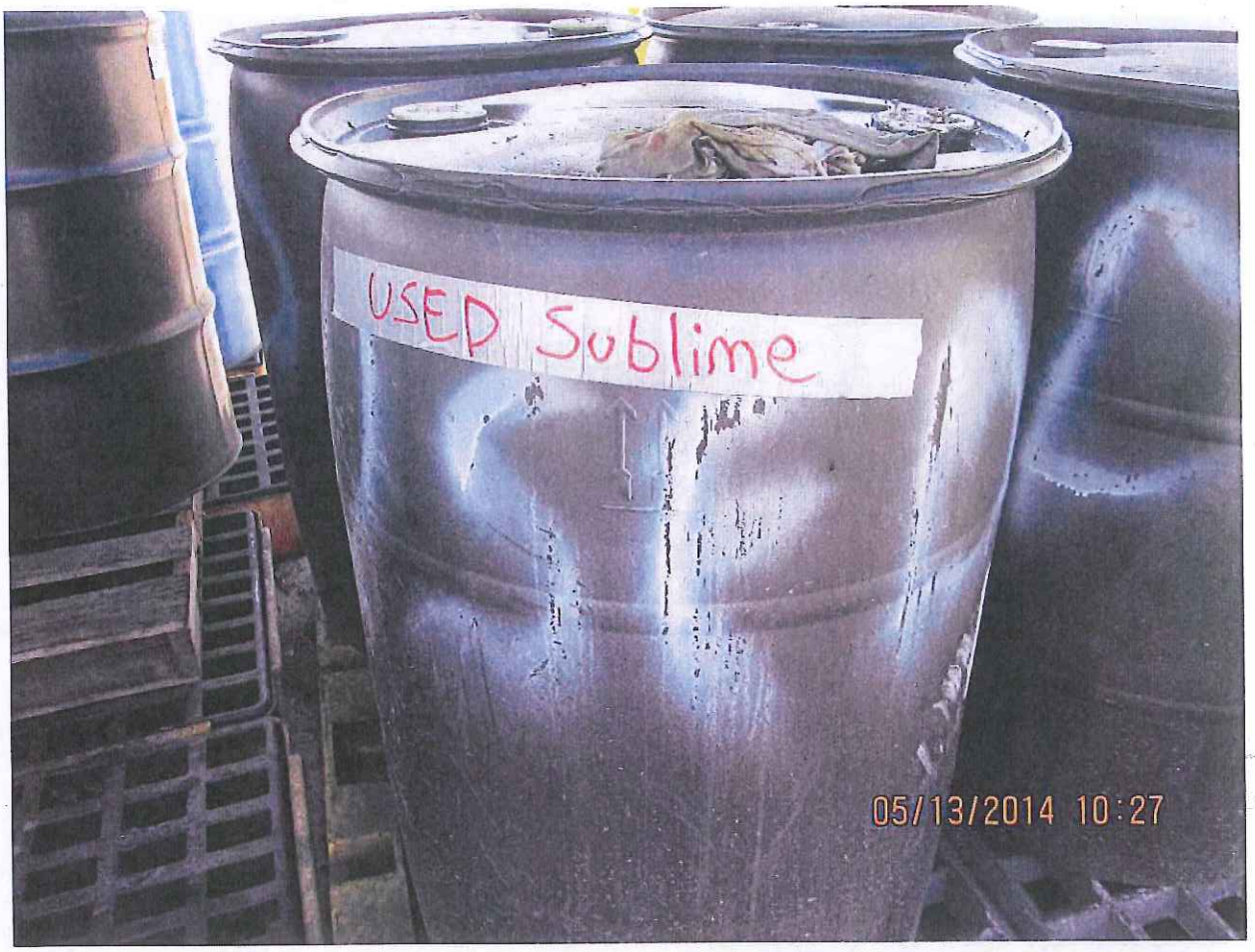

Photo 5: A drum of non-hazardous "Used Sublime" for boiler cleaning in the used oil storage area.

Photo 6: Several totes that appeared to contain used oil. It was clarified later in the inspection that these totes contained unused oil.

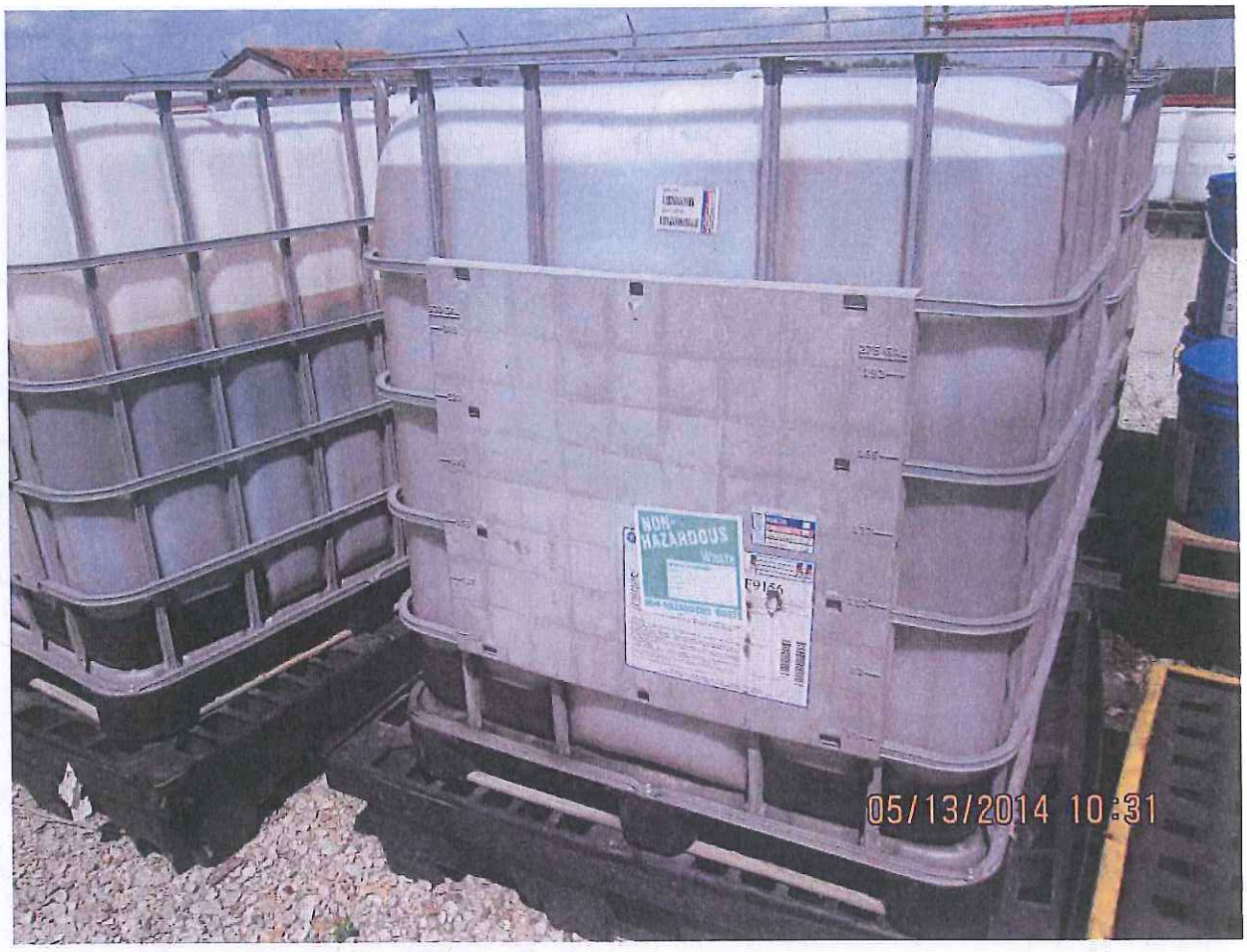

Photo 7: A tote near the chemical storage trailers labeled as "Dust Treat," or water that is used to control fugitive dust during coal unloading. The material is considered non-hazardous.

Photo 8: Four portable 20,000 gallon frac tanks which held hazardous waste HRSG wash water and a roll-off bin (left) which held hazardous waste HRSG ash. All containers were labeled and dated.

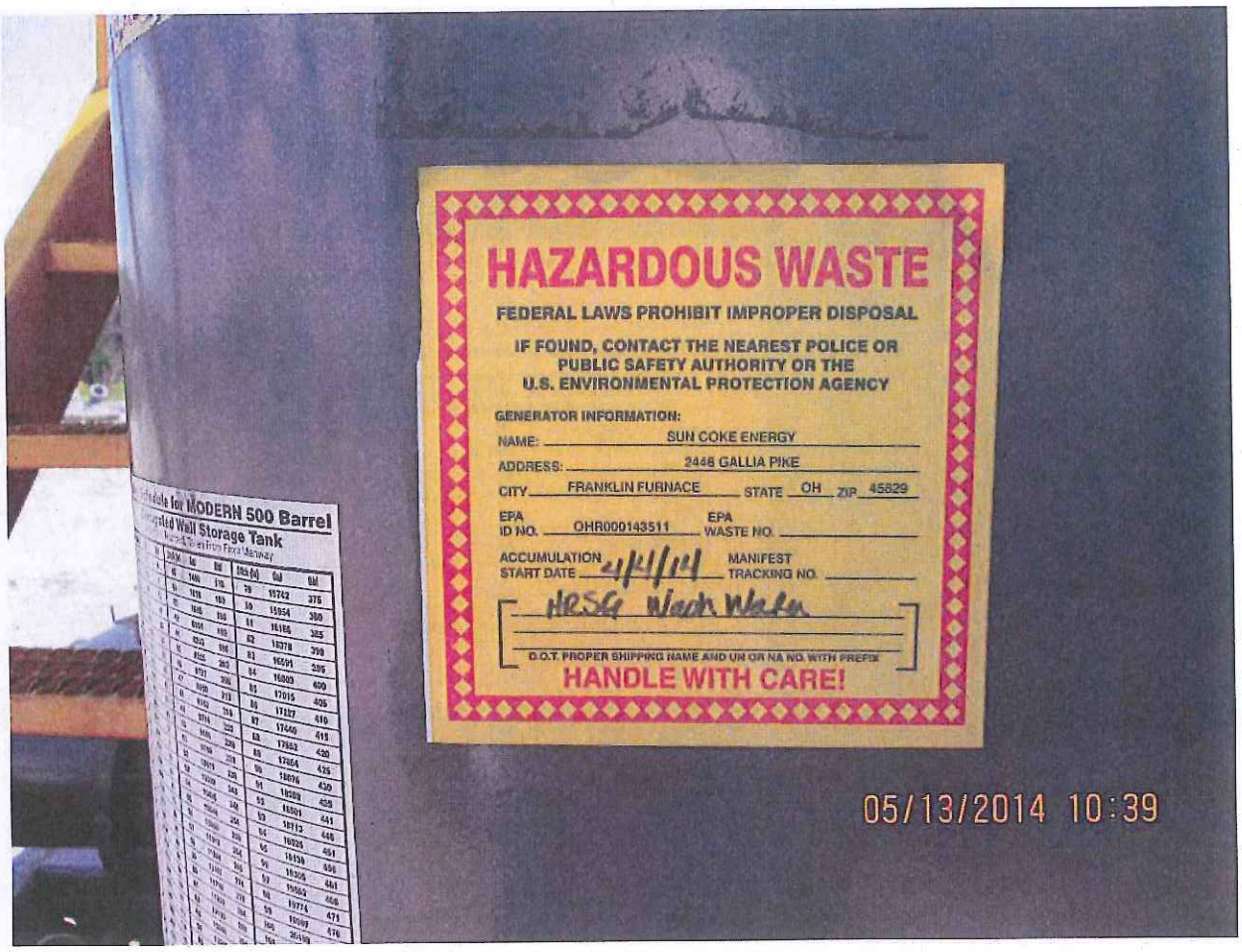

Photo 9: The label on one of the four HRSG wash water frac tanks dated 4/4/2014.

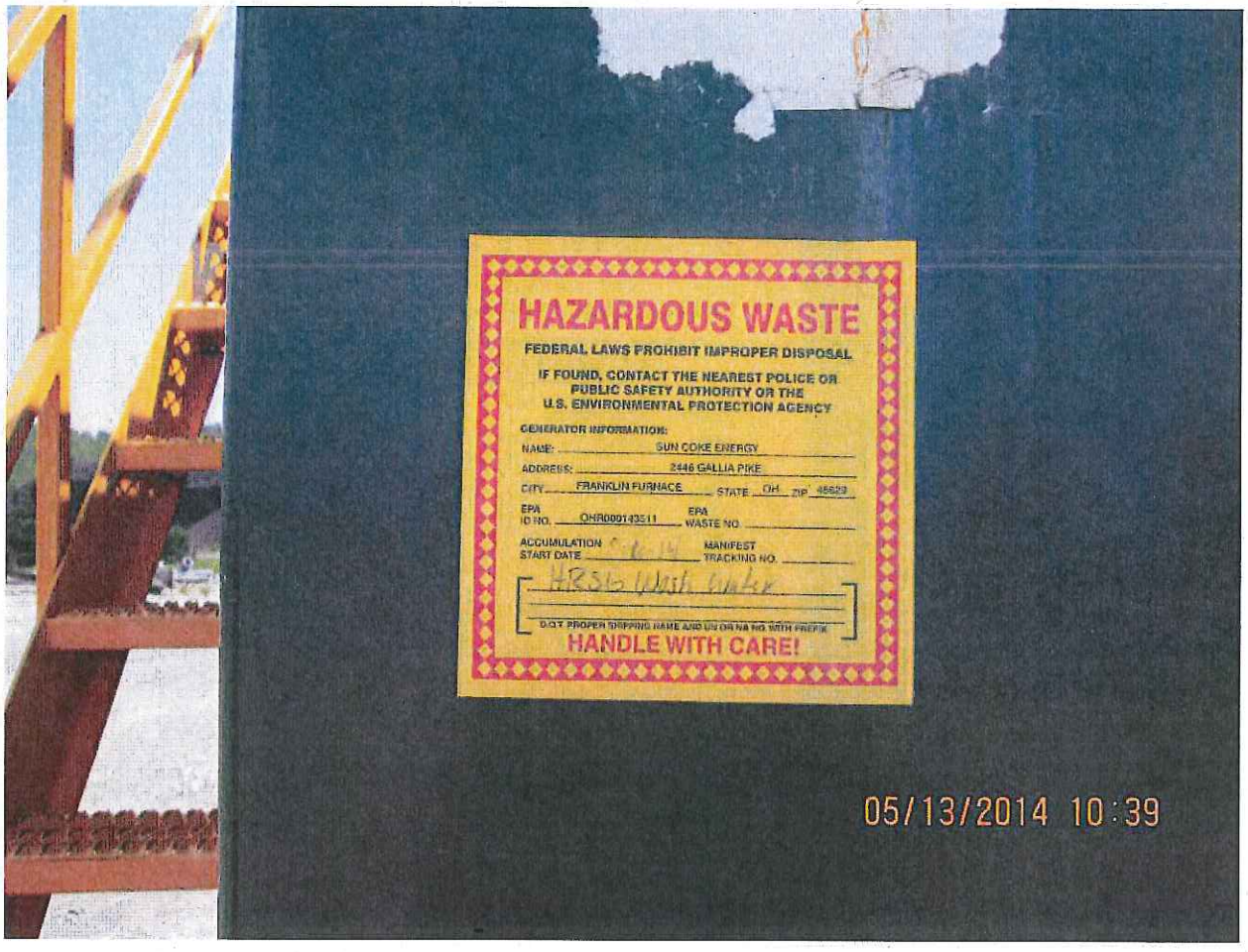

Photo 10: A HRSG wash water frac tank dated 5/6/2014.

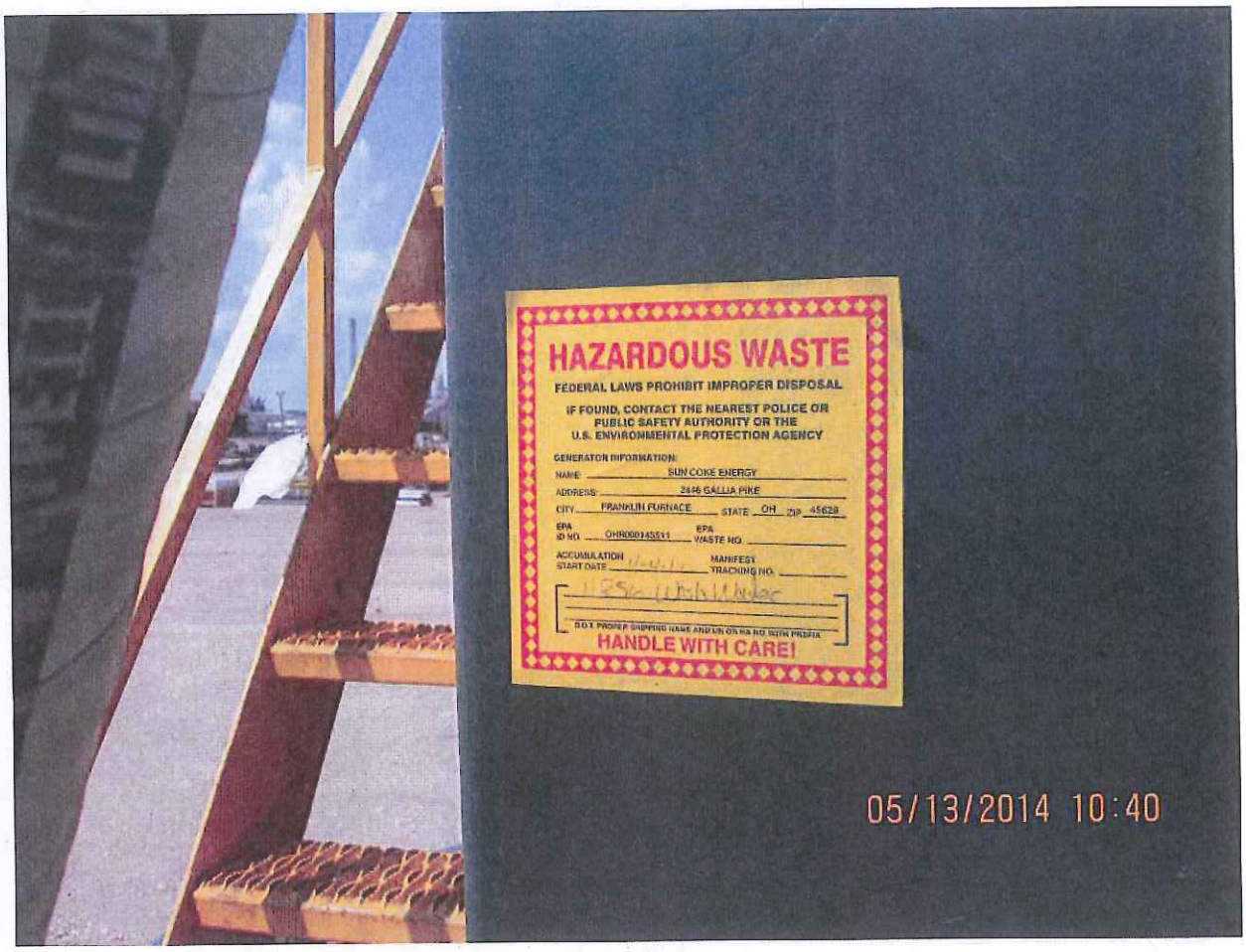

Photo 11: A HRSG wash water frac tank dated 4/4/2014.

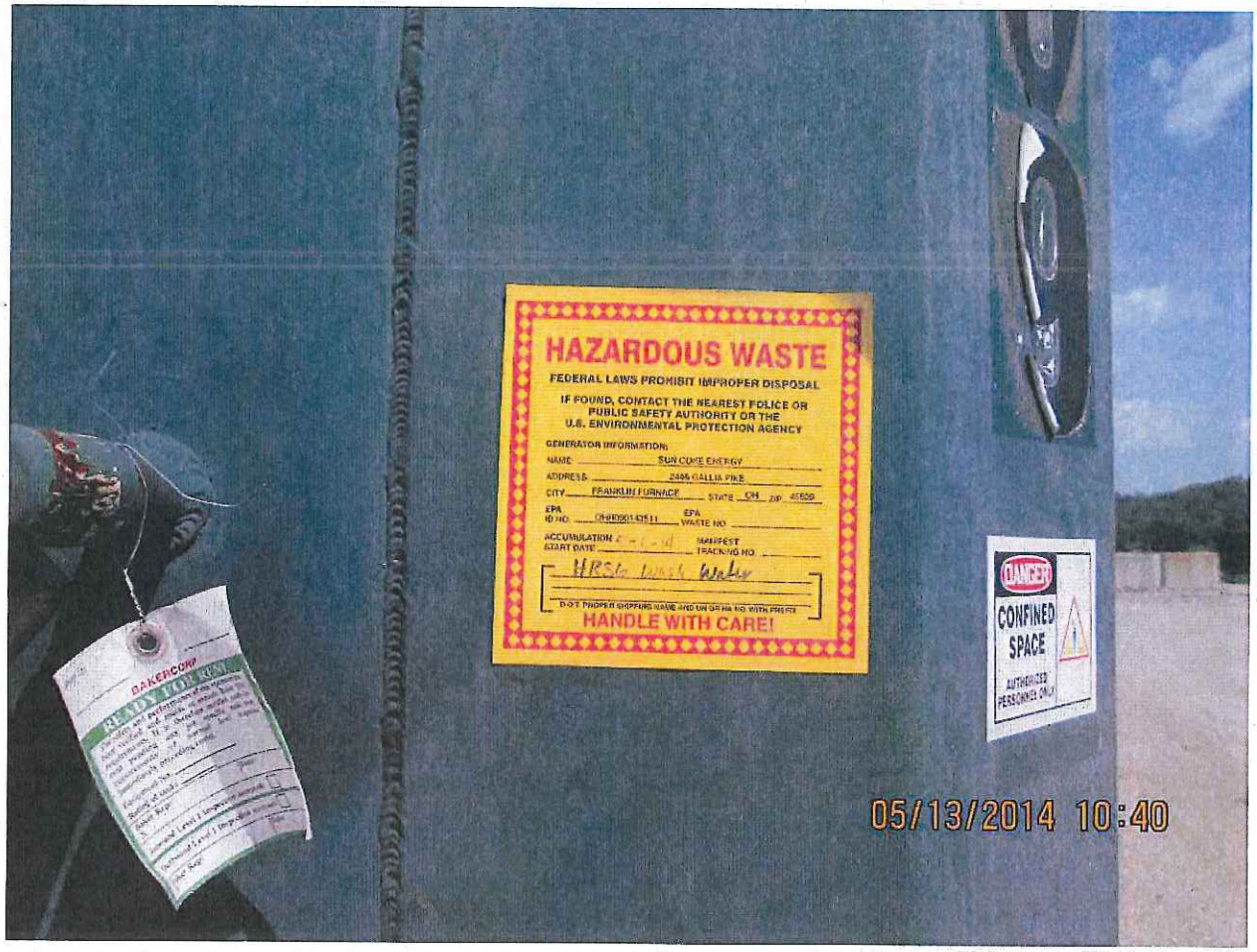

Photo 12: A HRSG wash water frac tank dated 5/6/2014.

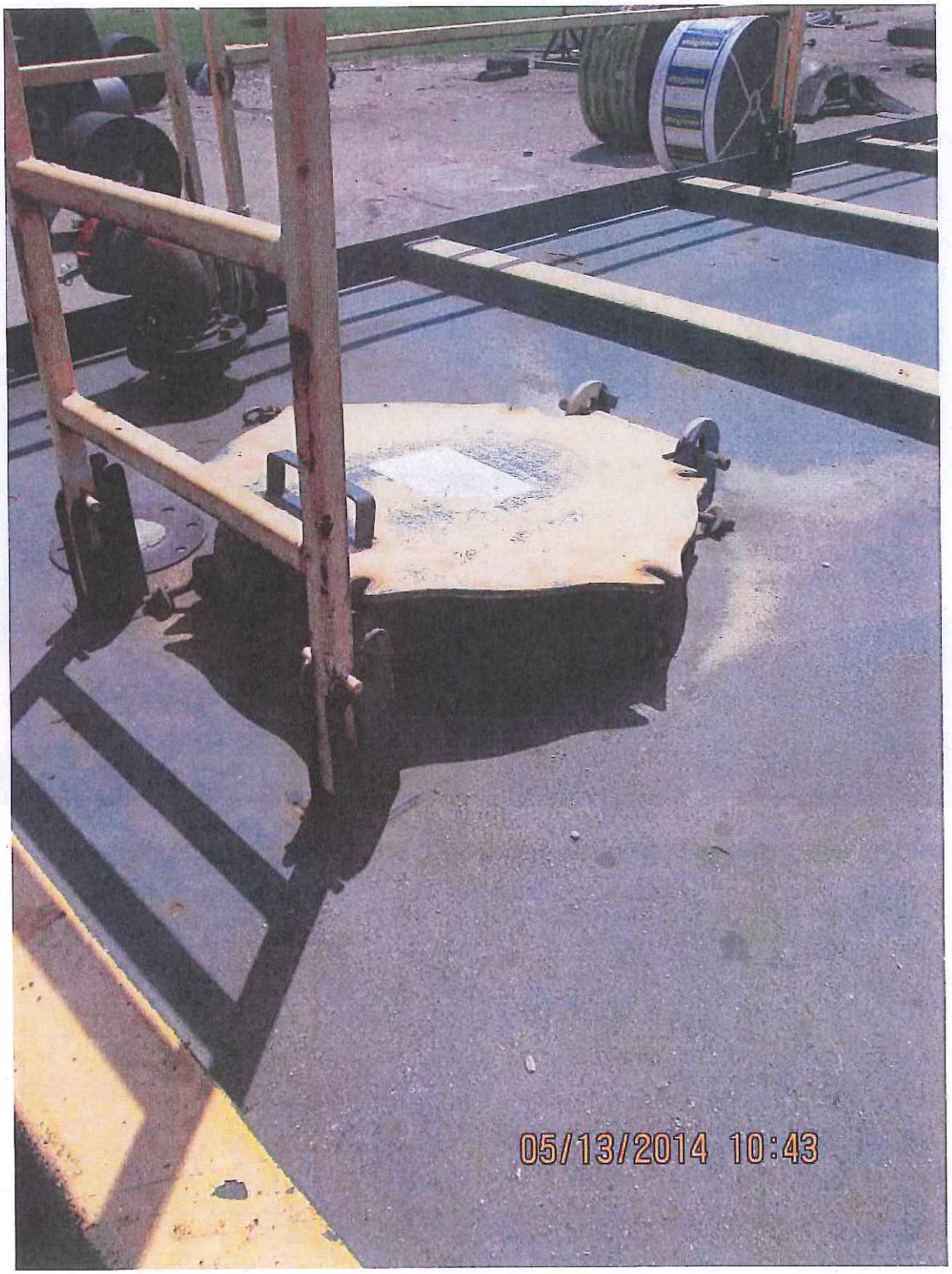

Photo 13: A lid on the top of a HRSG wash water frac tank that was partially open.

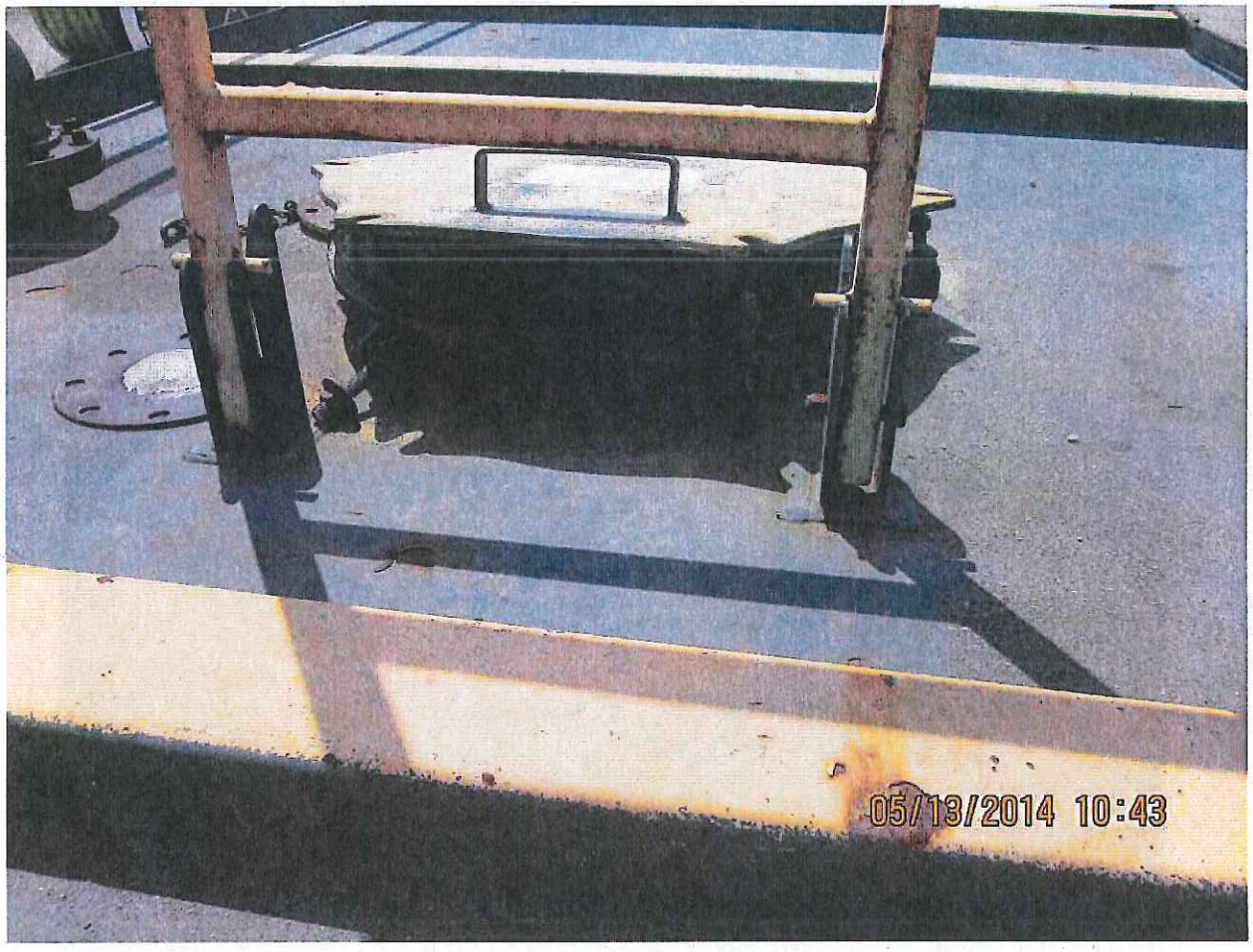

Photo 14: Another view of the open lid on the HRSG wash water frac tank in Photo 13.

Photo 15: A view of the concrete containment underneath the HRSG #1. When it is generated during clean outs, HRSG wash water accumulates in this containment area before being pumped and transferred to frac tanks.

Photo 16: Another view of the concrete containment area under the HRSG #1.

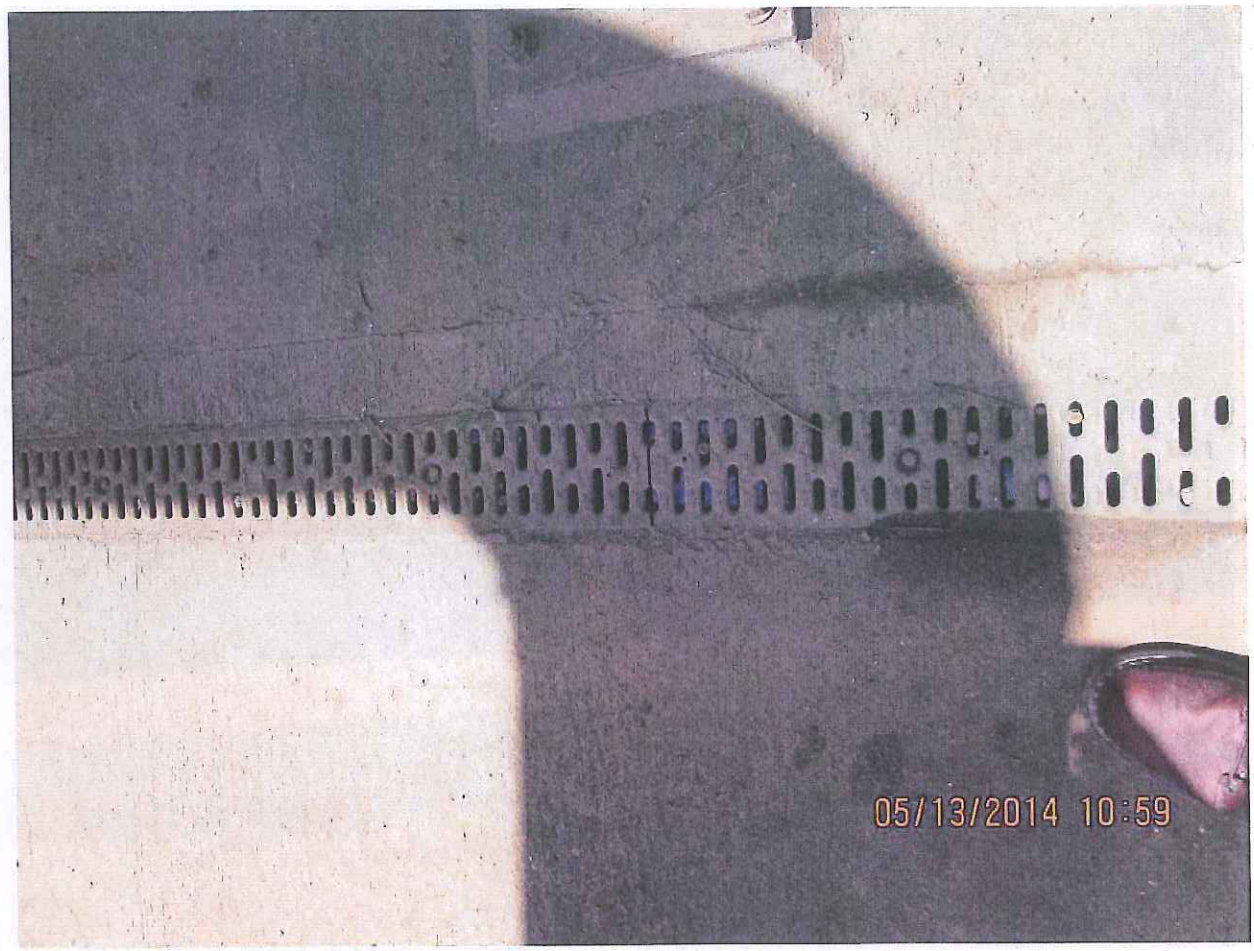

Photo 17: A grate in the HRSG #1 concrete containment in which HRSG wash water accumulates during clean outs.

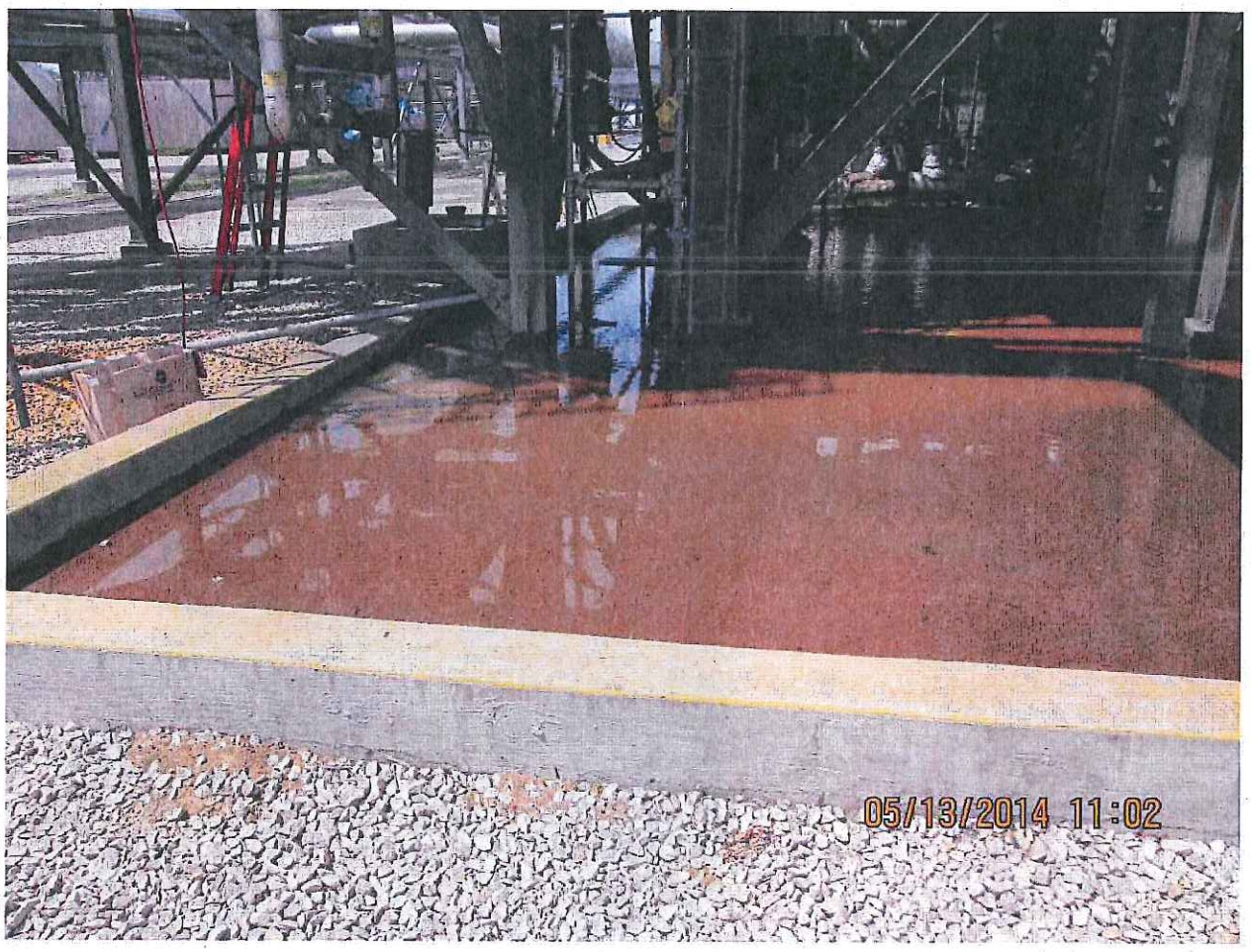

Photo 18: The concrete containment under HRSG #2. Mr. Nigl said the liquid accumulating in the containment area was fresh boiler feed water and pointed out a leaking pipe (not pictured). HRSG #2 was not operational at the time of the inspection.

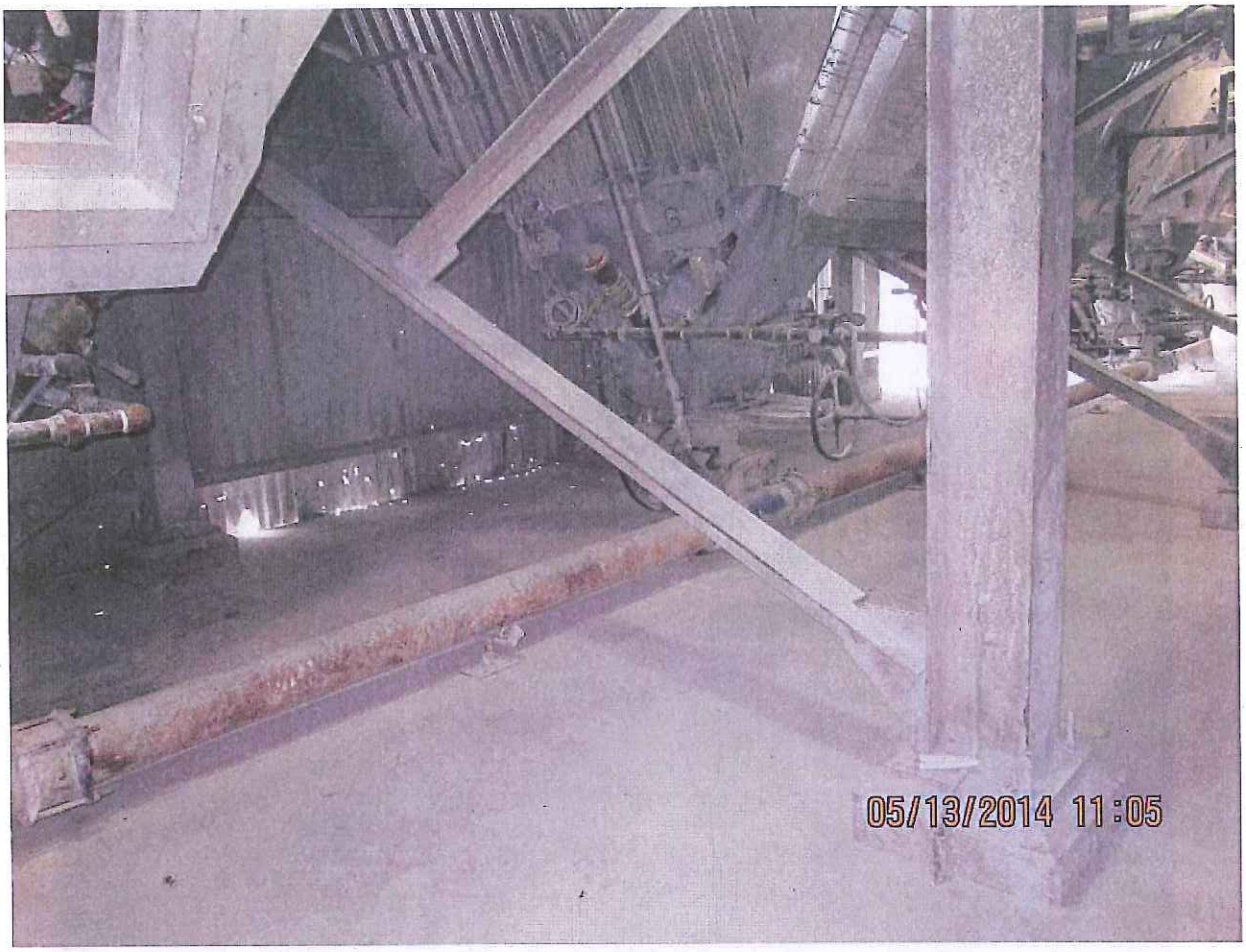

Photo 19: Several baghouses inside Phase 1's FGD unit. The baghouses empty into a common tunnel which carries the baghouse dust to a storage silo.

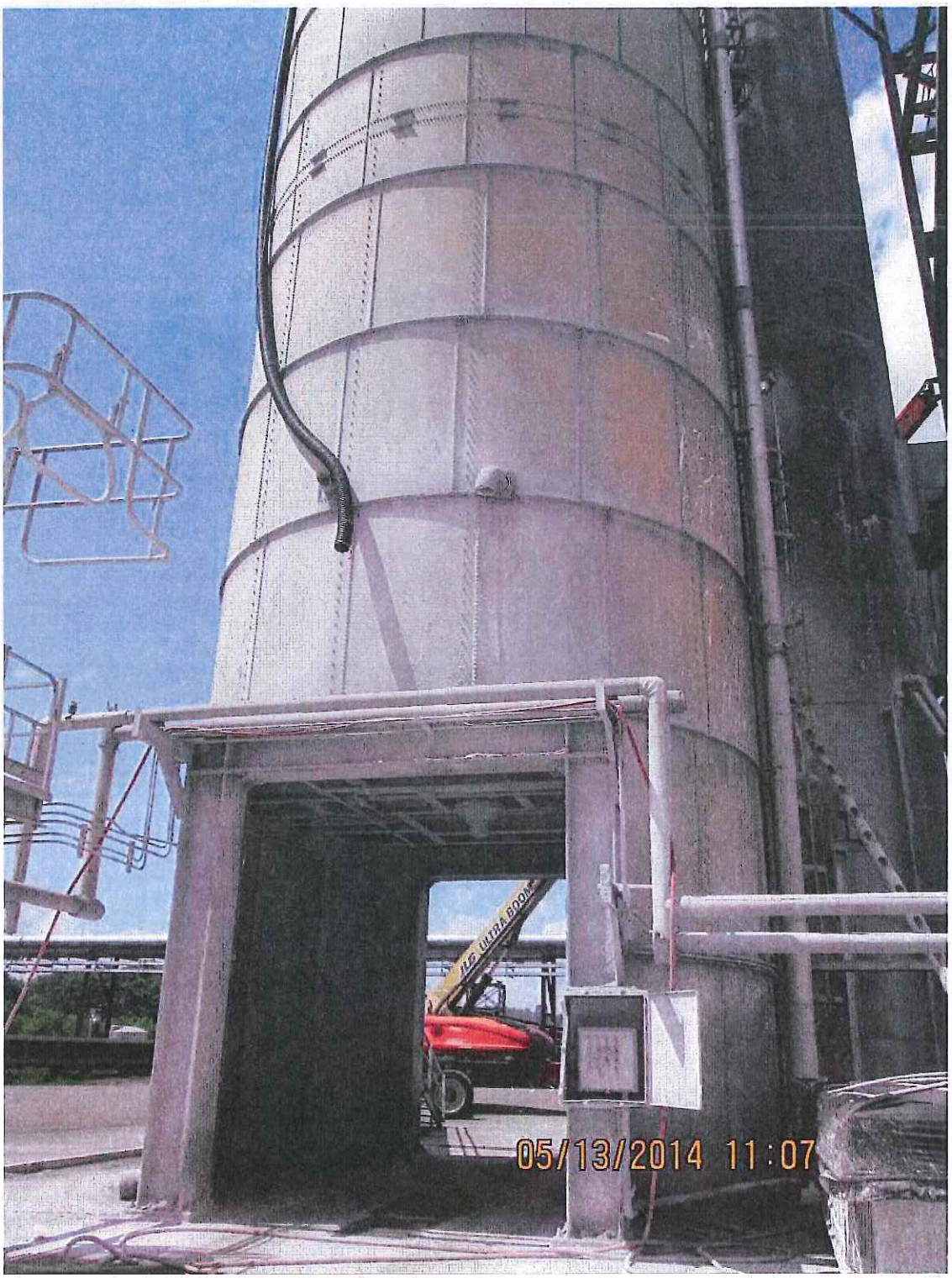

Photo 20: The baghouse dust silo at Phase 1's FGD unit.

Photo 21: A settling pit near FGD #1 used to recycle water used in the desulfurization process.

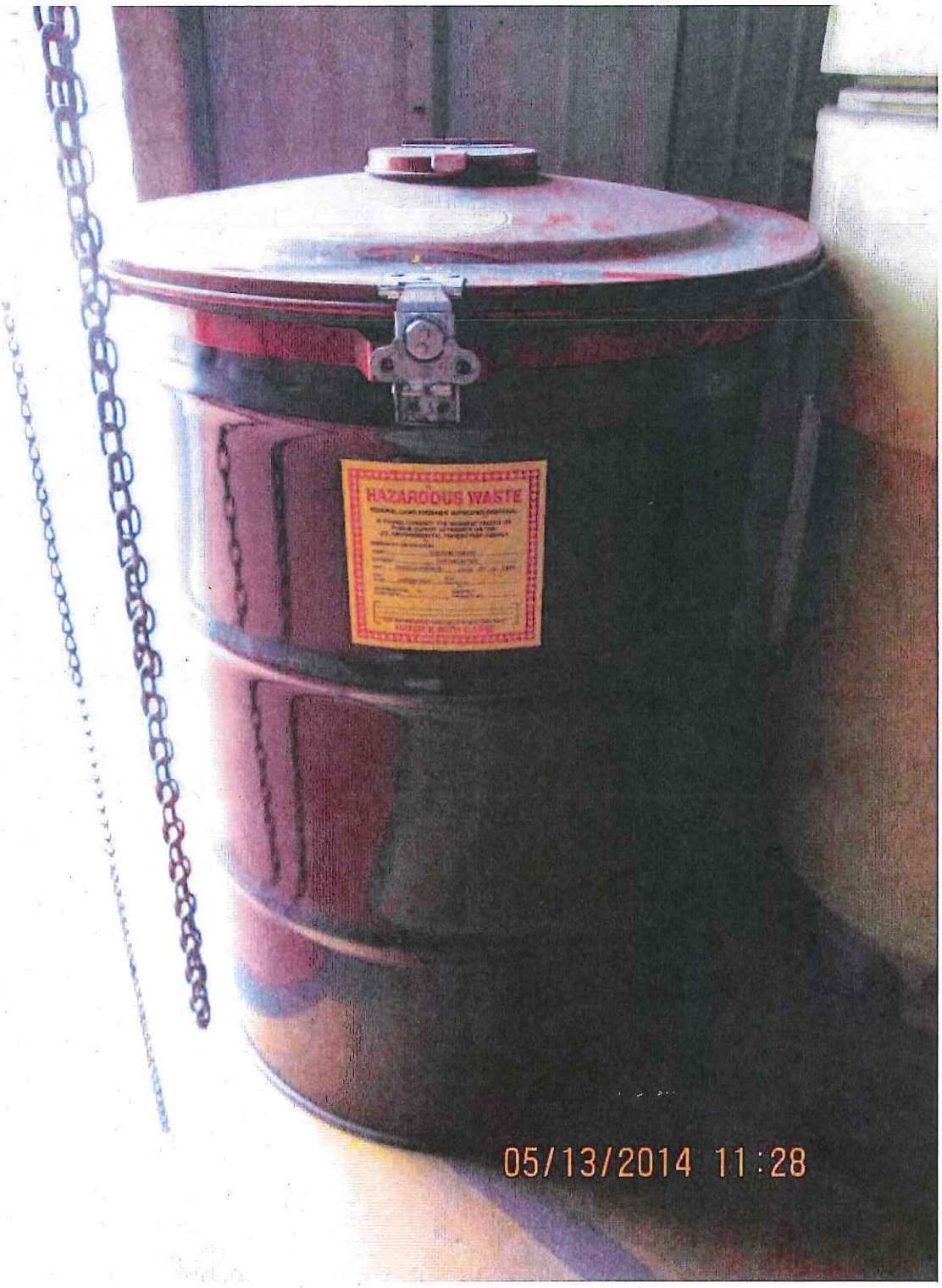

Photo 22: A 55 gallon satellite accumulation drum of hazardous waste aerosol cans in the Power Island Building.

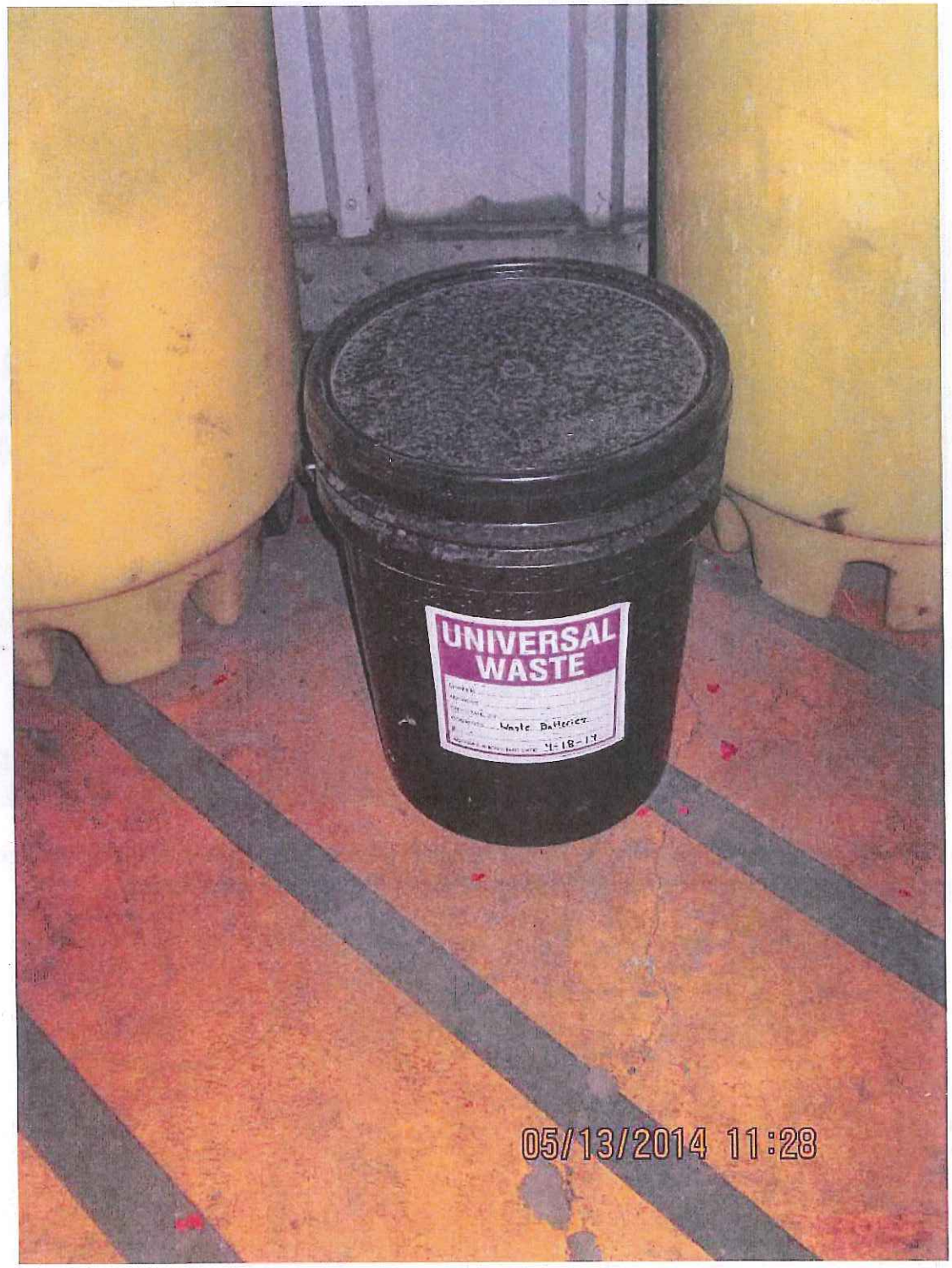

Photo 23: A bucket of universal waste batteries in the Power Island building. The bucket was dated 4/18/2014.

Photo 24: Six economizer units in the 90-day hazardous waste storage pad. Each economizer was labeled as hazardous waste due to the buildup of waste HRSG ash inside the unit.

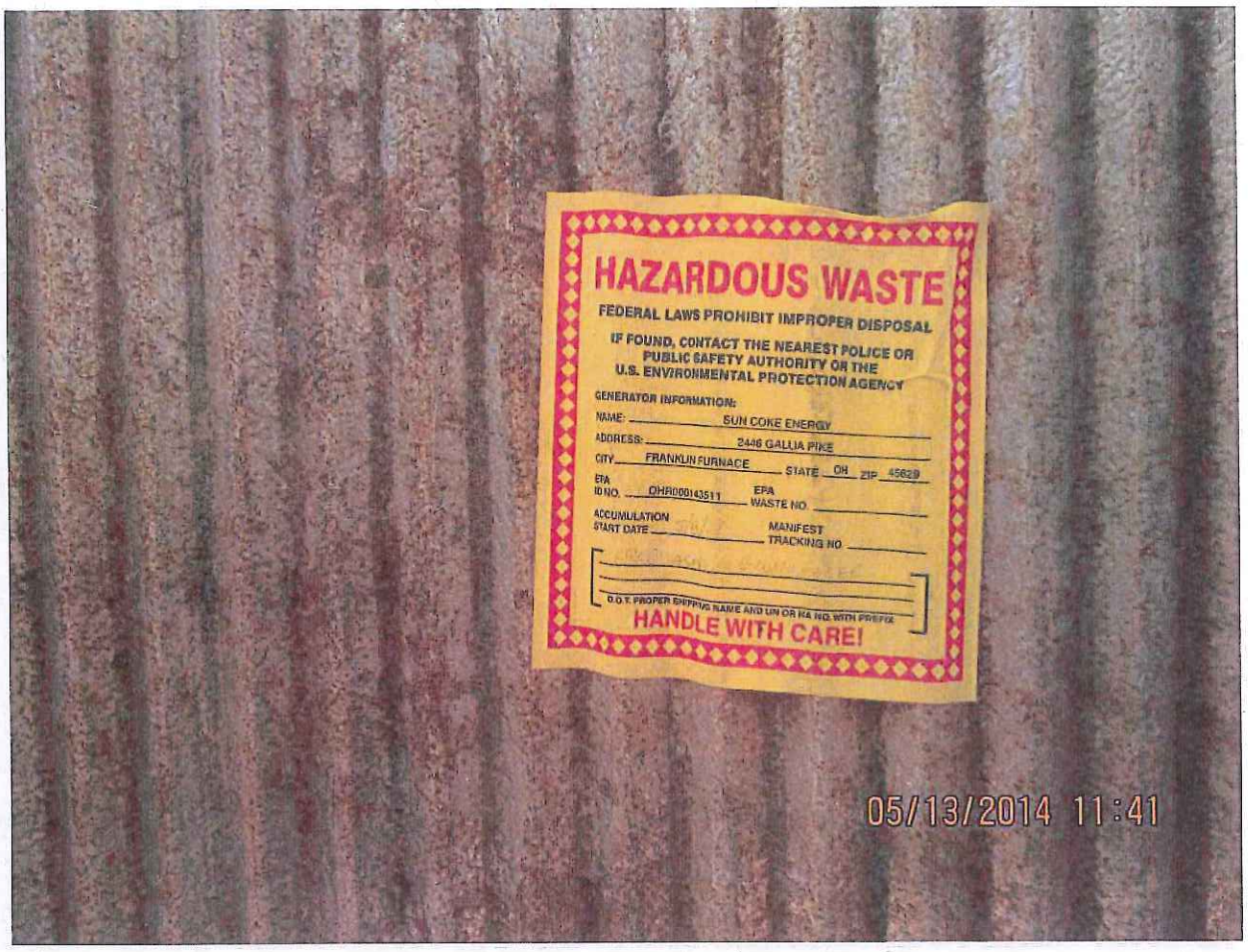

Photo 25: Hazardous waste label on one of the six economizer units SunCoke was storing on its 90-day pad. This unit was dated 5/8/2014, and marked as containing HRSG ash.

Photo 26: Another hazardous waste label on an economizer in the 90-day storage pad. This unit was dated as 5/6/2014 and also marked as containing HRSG ash.

Photo 27: A roll-off bin adjacent to the 90-day storage pad that contained hazardous waste HRSG boiler tubes and ash. The box was dated 4/4/2014.

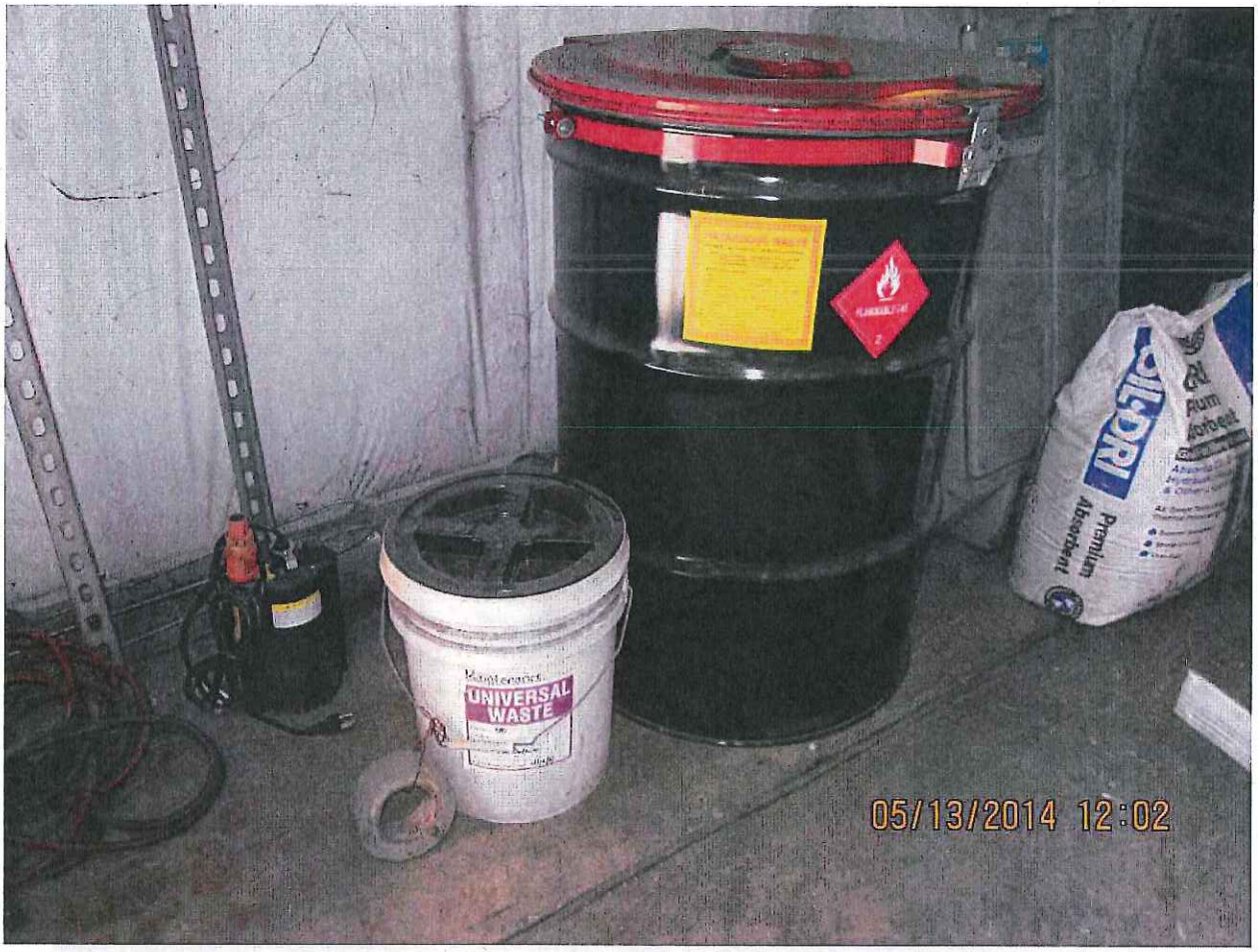

Photo 28: A satellite accumulation area in SunCoke's maintenance building. The drum contained spent aerosol cans and the bucket contained universal waste batteries and was dated 4/17/2014.

Photo 29: The universal waste light bulb storage area in SunCoke's warehouse. The spent bulbs were placed inside tear resistant bags and in boxes.

Photo 30: A view of the universal waste light bulb storage area. The boxes were marked as "Universal Waste Lamps."

ATTACHMENT B: Waste Storage Inspection Log

SunCoke - Haverhill Operations
Hazardous Waste Weekly Inspection Sheet

(Weekly inspections Per OAC 3745-66-74, note daily inspections for unloading per OAC 3745-65-15(B)(4))

Date/Time: 5/12/14 Inspector (Print Name): Justin Boyer

90 Day Storage Area Container Identification			
Container Type	No. of Containers	Earliest Date on Haz Waste Labels	Any Containers >90 Days?
Drums	0	—	—
Roll Off Bins	1	4/4/14	NO
Frac Tanks	~~3~~ 4**	4/4/14	NO

*transfer from SW to DW ** HH

Inspection Check list	Yes	No
Area all accumulation containers (drums, totes, Frac Tanks) labeled with the start date?	✓	
Are all accumulation containers (drums, totes, Frac Tanks) labeled "Hazardous Waste"?	✓	
Are emergency notification instructions posted nearby? Note: Containers of flammable waste require a danger/warning sign to be posted	✓	
Is fire protection equipment readily available?	✓	
Is the secondary containment area in good condition and clean?	✓	
Is spill control equipment readily available?	✓	
Are all containers (drums, totes, Frac Tanks) in good condition (no leaks, no corrosion, no bulges)?	✓	
Are all containers (drums, totes, Frac Tanks) closed (Lids, covers, & bungs "securely" closed)?	✓	
Is the Hazardous Waste Loading area clean?	✓	

Any "NO" responses must be corrected immediately, and the nature of the repairs or remedial actions must be noted below. In addition, note the DATE on which actions were taken to correct the situation.

Signature of Inspector: Justin Boyer DMS

Revised 5/21/2012

u economizer sections or pad

ATTACHMENT C: Sample Hazardous Waste Manifest

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number
2. Page 1 of
3. Emergency Response Phone
4. Manifest Tracking Number

5. Generator's Name and Mailing Address

Generator's Site Address (if different than mailing address)

Generator's Phone:

6. Transporter 1 Company Name

U.S. EPA ID Number

7. Transporter 2 Company Name

U.S. EPA ID Number

8. Designated Facility Name and Site Address

U.S. EPA ID Number

Facility's Phone:

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1.	1	CM	20	Y	
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Katie Patten | Signature | Month 8 | Day 8 | Year 13

GENERATOR

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

INT'L

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name | Signature | Month 08 | Day 08 | Year 13

Transporter 2 Printed/Typed Name | Signature | Month | Day | Year

TRANSPORTER

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) Month | Day | Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name | Signature | Month 8 | Day 20 | Year 13

DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

Stop Ticket

HERITAGE ENVIRONMENTAL SERVICES

Stop#: 1719048-[illegible]000

Trip#: 1316812

Pick-up: 08/08/13 - 08/08/13

Site#: 129457

Miles: 486

EPA ID#: OHRO[illegible]143511
PO#: 71999

Internal Contact
HEATH DEWALT (317)486-2833

RECEIVED
SEP 03 2013
Haverhill Operations
Env. Department

Mailing Address

KATIE LAIRD
HAVERHILL NORTH COKE CO
2446 GALLIA PIKE
FRANKLIN FURNACE, OH 45629-8837
UNITED STATES

Site Address (None)

HAVERHILL NORTH COKE CO
2446 GALLIA PIKE
FRANKLIN FURNACE, OH 45629-8837
UNITED STATES

Phone# (740)370-8710
LAIRD, KATIE - (740)355-9823

Driver Instructions: DELIVER 2 EMPTY BOXES, PICK UP 1 FULL BOX - USE DOUBLE HAULER
HERITAGE TRANSPORT, LLC (8000) (317)486-2973
IND058484114 US DOT#: 314460

Emergency Rate____ Pickup Demurrage____ Final Delivery Demurrage____
Tractor# 312 Trailer# 20-25
Odometer: Start____ End____
Liner Qty 2 1L Pump/Hose____ RO# TO HT RO-37 RO# TO HT____
PICKUP TIME: 08:00-12:00 RO# TO GEN RO-26 RO# TO GEN RO-138
Stop Type SWAP RO Type OPEN TOP RO Size 20 Liner Qty__

1) DELAYED AT A PRIOR STOP
2) RESCHEDULED (CUSTOMER OR HERITAGE)
3) CUSTOMER NOT AVAILABLE AT SCHEDULED TIME
4) TRUCK / EQUIPMENT BREAKDOWN OR UNAVAILABLE
5) PAPERWORK OR INCOMPATIBILITY ISSUE
6) TRAFFIC / WEATHER / CONSTRUCTION / DIRECTIONS
7) FULL TRUCK (REQUIRES RESCHEDULE)
8) DOT HOS / DRIVER ILLNESS
9) CUSTOMER ACCEPTED EARLY (SIGNATURE REQUIRED)

Driver# 4350 Driver Name Ken Wheeler Date 8-8-13

HERITAGE ENVIRONMENTAL SERVICES (9000)
7901 W MORRIS ST, INDIANAPOLIS, IN 46231-3301 UNITED STATES
IND093219012
(317)243-0811

P/U Items	Common Name	See Manifest	Transaction	Prod	Ref#	Ord	Type
1	HRSG ASH	000554355WAS-1	6111914	7	Y3N	1	CM

ADDL EQUIP:
PPE: GLVS,GOGLS,APRON OR PCTYVEK SUIT
SPL INSTRS: DELIVER 2 EMPTY BOXES, PICK UP 1 FULL BOX - USE DOUBLE HAULER

Site Rep Name Katie Baxter Signature [illegible] Date 8/8/13

139665: HAVERHILL NORTH COKE CO
Company\Loc: 48\12

ATTACHMENT D: HRSG Wash Water Waste Profile

STANDARD ENVIRONMENTAL

DIVISION OF STANDARD LABORATORIES

Report of Analysis

Name:	Haverhill Coke Company DJ Wheeler 2446 Gallia Pike Franklin Furnace, OH 45629	**Sample ID#:**	09987029
		Project #:	(None)
		Sample Source:	Grab
		Site:	HRSG Wash Water
Sample Date:	5/25/2011		
Receipt Date:	5/25/2011 15:05		
Report Date:	6/7/2011		

Parameter	Sample Result	Units	MDL	Analysis Start	Analysis End (If Applicable)	Method	Analyst
Inorganic Compounds							
pH	2.55	SU	0.02	05/25/2011 15:28		SW 9040C	JAS
Total Dissolved Solids	98800	mg/L	10	06/02/2011 10:30		SM 2540C	DLT
Metals							
TCLP Barium	0.352	mg/L	0.28	05/31/2011 12:22		SW 6010B	ADG
TCLP Cadmium	9.99	mg/L	0.28	05/31/2011 12:22		SW 6010B	ADG
TCLP Chromium	12.0	mg/L	0.25	05/31/2011 12:22		SW 6010B	ADG
TCLP Lead	20.6	mg/L	2.8	06/02/2011 9:53		SW 6010B	ADG
TCLP Mercury	ND	mg/L	0.0001	06/03/2011 13:52		SW 7470A	ADG
TCLP Selenium	ND	mg/L	0.26	05/31/2011 12:22		SW 6010B	ADG
TCLP Silver	ND	mg/L	0.12	05/31/2011 12:22		SW 6010B	ADG
TCLP Arsenic	23.3	mg/L	1.9	06/02/2011 9:53		SW 6010B	ADG
Semi Volatiles							
TCLP 1,4-Dichlorobenzene	ND	mg/L	0.2	06/01/2011 21:15		SW 8270D	DLC
TCLP 2,4,5-Trichlorophenol	ND	mg/L	0.25	06/01/2011 21:15		SW 8270D	DLC
TCLP 2,4,6-Trichlorophenol	ND	mg/L	0.25	06/01/2011 21:15		SW 8270D	DLC
TCLP 2,4-Dinitrotoluene	ND	mg/L	0.1	06/01/2011 21:15		SW 8270D	DLC
TCLP Hexachlorobenzene	ND	mg/L	0.2	06/01/2011 21:15		SW 8270D	DLC
TCLP Hexachlorobutadiene	ND	mg/L	0.1	06/01/2011 21:15		SW 8270D	DLC
TCLP Hexachloroethane	ND	mg/L	0.1	06/01/2011 21:15		SW 8270D	DLC
TCLP m/p-Cresol	ND	mg/L	0.5	06/01/2011 21:15		SW 8270D	DLC
TCLP Nitrobenzene	ND	mg/L	0.1	06/01/2011 21:15		SW 8270D	DLC
TCLP o-Cresol	ND	mg/L	0.25	06/01/2011 21:15		SW 8270D	DLC
TCLP Pentachlorophenol	ND	mg/L	0.25	06/01/2011 21:15		SW 8270D	DLC
TCLP Pyridine	ND	mg/L	0.25	06/01/2011 21:15		SW 8270D	DLC
TCLP Total Cresol	ND	mg/L	0.75	06/01/2011 21:15		SW 8270D	DLC

Reviewed by: Rebecca Kiser

Rebecca Kiser

147 11th Avenue
South Charleston,
WV 25303
304-755-0536

ND = Not Detected

Note: The test results are only valid for date sample was taken. We do not accept any liability for use of these results.

STANDARD ENVIRONMENTAL

DIVISION OF STANDARD LABORATORIES

Report of Analysis

Name:	Haverhill Coke Company DJ Wheeler 2446 Gallia Pike Franklin Furnace, OH 45629	**Sample ID#:**	09987029
		Project #:	(None)
		Sample Source:	Grab
		Site:	HRSG Wash Water
Sample Date:	5/25/2011		
Receipt Date:	5/25/2011 15:05		
Report Date:	6/7/2011		

Parameter	Sample Result	Units	MDL	Analysis Start	Analysis End (If Applicable)	Method	Analyst
Volatile Organic Compounds							
TCLP 1,1-Dichloroethene	ND	mg/L	0.1	06/01/2011 18:13		SW 8260B	RLK
TCLP 1,2-Dichloroethane	ND	mg/L	0.1	06/01/2011 18:13		SW 8260B	RLK
TCLP 2-Butanone (MEK)	ND	mg/L	1	06/01/2011 18:13		SW 8260B	RLK
TCLP Benzene	ND	mg/L	0.1	06/01/2011 18:13		SW 8260B	RLK
TCLP Carbon Tetrachloride	ND	mg/L	0.1	06/01/2011 18:13		SW 8260B	RLK
TCLP Chlorobenzene	ND	mg/L	0.1	06/01/2011 18:13		SW 8260B	RLK
TCLP Chloroform	ND	mg/L	0.1	06/01/2011 18:13		SW 8260B	RLK
TCLP Tetrachloroethene	ND	mg/L	0.1	06/01/2011 18:13		SW 8260B	RLK
TCLP Trichloroethene	ND	mg/L	0.1	06/01/2011 18:13		SW 8260B	RLK
TCLP Vinyl Chloride	ND	mg/L	0.1	06/01/2011 18:13		SW 8260B	RLK

QC Data by Sample:

Sample ID: **09987029** Report Date: **6/7/2011**

QC Type	Result	Units	Batch
Nitrobenzene-d5	49	% Rec.	9713
2-Fluorobiphenyl	85	% Rec.	9713
Terphenyl-d14	73	% Rec.	9713
2-Fluorophenol	86	% Rec.	9713
Phenol-d5	17	% Rec.	9713
2,4,6-Tribromophenol	100	% Rec.	9713
Dibromofluorobenzene	105	% Rec.	9716
Toluene-D8	97	% Rec.	9716
Bromofluorobenzene	94	% Rec.	9716

Reviewed by: Rebecca Kiser

147 11th Avenue
South Charleston,
WV 25303
304-755-0536

ND = Not Detected

Note: The test results are only valid for date sample was taken. We do not accept any liability for use of these results.

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1.1 REGULATORY BASIS

This Resource Conservation and Recovery Act (RCRA) Contingency Plan ("Contingency Plan") is required by Ohio Administrative Code (OAC) 3745-52-34(A)(4) and 40 C.F.R. § 262.34 for most industrial facilities that generate or accumulate hazardous waste. The regulatory requirements are provided in OAC 3745-65-50 through -56 and 40 C.F.R. Part 265.

The purpose of this Contingency Plan is to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water.

The provisions of this Contingency Plan must be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment (a "hazardous waste emergency").

The Emergency Coordinator will be responsible for implementing the initial responses required to minimize hazards to human health and the environment, and will report incidents to the appropriate state and federal agencies.

A current copy of this Contingency Plan and any subsequent revisions must be provided to the local Police and Fire departments, local hospital, the Highway Patrol, the local Sheriff, the Scioto County LEPC and Brown Medical. These are listed in Section 6 Contingency Plan Service Arrangements and Section 13 Mailing List. Copies of the Plan are mailed to each agency using the United States Postal Service (USPS) Certified Mail program, which mails back to SunCoke Energy - Haverhill Operations (SunCoke) a signed and dated receipt of delivery.

1.2 PLANT SECURITY

The main entrance for trucks, employees, contractors, and visitors is from Gallia Pike, which is on the west side of the facility. A guard is stationed at the main entrance to check identification before allowing access to the site. The main entrance is fenced and all personnel and visitors are required to badge in and out through the security gate at the guard shack. Before the main entrance, an additional gate is present through which construction contractors enter and leave the site. This side entrance is also fenced and all personnel and visitors are required to badge in and out through the security gate at the construction guard shack.

The facility receives coal from railcar deliveries and ships coke via railcar. Railcars enter and exit from the east side of the facility.

Hazardous materials and/or wastes are stored in designated areas.

1.3 FACILITY DESCRIPTION

Company Name:.....SunCoke Energy - Haverhill Operations
Facility Address:.....2446 Gallia Pike, Franklin Furnace, Ohio 45629
Telephone: 740-355-9800
FAX: 740-355-9815

EPA ID Number: OHR000143511

SunCoke Energy - Haverhill Operations (SunCoke) operates four (4) non-recovery coke oven batteries with 200 coke ovens, which operate 24-hours per day, seven (7) days per week. The plant occasionally generates and/or accumulates over 2,200 pounds of hazardous waste per month; therefore, according to the Ohio environmental regulations, SunCoke is classified as an EPA Large Quantity Generator. A copy of the notice of the change of generator status is found in Appendix A of this plan.

2.1 DESCRIPTION OF HRSG WASH WATER

Volume generated on Site:	Approximately 3,000 - 12,000 gallons per heat recovery steam generator (HRSG) cleanout.
Handling Method:	Vacuum truck and Frac Tank
DOT Emergency Guide Number:	154
Shipping Name:	RQ, Waste Corrosive Liquid, N.O.S. 8
Identification Number:	UN3263
EPA Waste Code:	D004, D006, D007, & D008
Reportable Quantity:	1 lb. (D004), 10 lbs. (D006, D007, & D008)

2.2 DESCRIPTION OF HRSG ASH

Volume generated on Site:	Approximately 10 – 30 tons per heat recovery steam generator (HRSG) cleanout.
Handling Method:	Vacuum truck and roll off bin
DOT Emergency Guide Number:	171
Shipping Name:	RQ, Hazardous Waste Solid, N.O.S. 9
Identification Number:	UN3077
EPA Waste Code:	D004, D006, D007, & D008
Reportable Quantity:	1 lb. (D004), 10 lbs. (D006, D007, & D008)

2.3 DESCRIPTION OF HRSG ASH COVERED BOILER TUBES

Volume generated on Site:	Approximately 10 – 30 tons per heat recovery steam generator (HRSG) cleanout. Approximately ½ - 1 ton during forced outage.
Handling Method:	Roll off bin and cubic yard box
DOT Emergency Guide Number:	171
Shipping Name:	RQ, Hazardous Waste Solid, N.O.S. 9
Identification Number:	UN3077
EPA Waste Code:	D004, D006, D007, & D008

Reportable Quantity:	1 lb. (D004), 10 lbs. (D006, D007, & D008)

2.4 Description of Waste Aerosol Cans

Volume generated on Site:	Between 1 and 4, 55-gallon drums and/or between 1 and 150 pounds, depending on the next scheduled pickup.
Handling Method:	Closed Steel drums
DOT Emergency Guide Number:	129
Shipping Name:	Flammable Liquids
Identification Number:	UN1173
EPA Waste Code:	D001, D035, D039, D040
Reportable Quantity:	100 lbs. (D001), 5000 lbs. (D035), 100 lbs. (D039, D040)

Copies of the Material Safety Data Sheets (MSDSs) for each material are available upon request.

The MSDS will be used as a guide to the properties of the substances contained in the aerosol cans.

2.5 Description of Waste Sulfuric Acid

Volume generated on Site:	Between 1 and 3, 55-gallon drums and/or between 600 and 1,800 pounds, depending on the next scheduled pickup.
Handling Method:	Closed Poly drums
DOT Emergency Guide Number:	137
Shipping Name:	Sulfuric Acid
Identification Number:	UN1830
EPA Waste Code:	D002
Reportable Quantity:	1000 lbs.

2.6 Description of Miscellaneous Waste

SunCoke will update this Contingency Plan if a new hazardous waste stream is generated onsite.

3.1 RISKS INVOLVING HAZARDOUS WASTE

3.1.1 RISK POTENTIAL OF HRSG WASH WATER

The HRSG wash water is a liquid with some suspended solid materials. The wash water is a potential ground contaminant, thus must be managed to prevent spills. The wash water is corrosive; however, it is not a fire hazard or an immediate health issue.

3.1.2 RISK POTENTIAL OF HRSG ASH

The ash is a solid material, but is a potential ground contaminant, thus must be managed to prevent spills. The boiler ash waste is a dust hazard; however, it is not a fire hazard or an immediate health issue.

3.1.3 RISK POTENTIAL OF HRSG ASH COVERED BOILER TUBES

The ash covered boiler tubes are solid materials, but are a potential ground contaminant, thus must be managed to prevent spills. The boiler ash covered boiler tubes may present a dust hazard during cutting; however, it is not a fire hazard or an immediate health issue.

3.1.4 RISK POTENTIAL OF WASTE AEROSOL CANS

The majority of the aerosol cans collected are empty. However, occasionally, an aerosol can malfunctions and cannot be used; therefore, SunCoke has taken the position to collect all aerosol cans (empty and mostly empty cans), and handle them as hazardous waste. The empty cans are not a fire hazard or immediate health issue. The few mostly empty cans are a potential fire/explosion hazard. However, since all the aerosol cans are kept in closed, steel drums with a vapor trap lid, the fire/explosion risk is small.

It is important to note that SunCoke is making every effort to use the entire contents of the can, though SunCoke cannot ensure that all aerosol cans are empty.

3.1.5 RISK POTENTIAL OF SULFURIC ACID SLUDGE

The sulfuric acid is a liquid with some suspended solid materials. The sulfuric acid is a potential ground contaminant, thus must be managed to prevent spills. The sulfuric acid is corrosive; however, it is not a fire hazard or an immediate health issue.

3.2 WASTE HANDLING

The majority of the hazardous waste generated onsite is from the cleanout of the heat recovery steam generators (HRSGs). Very little hazardous waste is generated from other sources.

3.2.1 FRAC TANK AND TRANSFER – HRSG WASH WATER

The facility collects wash water from the HRSG cleanouts. The wash water has been determined to be a characteristic hazardous waste. The facility collects the wash water during the cleanout using a vacuum tank truck. When the tank truck becomes full, the wash water is transferred to a frac tank located at the less than 90 day storage area. This area is across the road from Power Island, between Phase I and Phase II. The frac tank is emptied by a hazardous waste management company. The wash water is shipped offsite in less than 90 days. All transfer of waste is done within secondary containment to prevent spills, whenever practicable.

3.2.2 ROLL OFF BINS – HRSG ASH

The facility collects HRSG ash from the HRSG cleanouts. The ash has been determined to be a characteristic hazardous waste. The facility collects the ash during the cleanout using a vacuum tank truck. When the tank truck becomes full, the ash is transferred to a roll off located at the less than 90 day storage area. This area is across the road from Power Island, between Phase I and Phase II. The roll off bin is picked up by a hazardous waste management company. The waste ash is shipped offsite in less than 90 days. All transfer of waste is done within secondary containment to prevent spills, whenever practicable.

3.2.3 ROLL OFF BINS AND CUBIC YARD BOXES – HRSG ASH COVERED BOILER TUBES

The facility collects HRSG Ash Covered Boiler Tubes from the HRSG cleanouts. The ash that collects on the boiler tubes has been determined to be a characteristic hazardous waste. In addition,. The facility cuts and removes the HRSG Ash Covered Boiler Tubes from the HRSG during the cleanout and forced outages. The cut HRSG Ash Covered Boiler Tubes are immediately placed into a roll off or cubic yard box, located at the less than 90 day storage area. This area is across the road from Power Island, between Phase I and Phase II. The roll off bin and/or cubic yard box is picked up by a hazardous waste management company. The waste HRSG Ash Covered Boiler Tubes are shipped offsite in less than 90 days. Transfer of waste is done within secondary containment to prevent spills, whenever practicable.

3.2.4 DRUM STORAGE AND TRANSFER - WASTE AEROSOL CANS AND SULFURIC ACID SLUDGE

The facility collects waste aerosol cans in open head 55-gallon steel drums with vapor trap lids at two (2) satellite accumulation locations in the plant. Employees are trained to close the drum after placing an aerosol can in the drum. When the facility determines that the drum is full, the full drum is dated and placed in the less than 90 day storage area. The hazardous waste management company is then contacted to remove the full drum. When the full drum is moved from satellite accumulation to the less than 90 day storage area, SunCoke will place an empty drum in the satellite accumulation area.

The facility collects waste sulfuric acid in closed head 55-gallon poly drums during the cleanout of the sulfuric acid containment in Power Island. The waste sulfuric acid has been determined to be a characteristic hazardous waste. The facility collects the waste sulfuric acid during the cleanout using a vacuum pump to transfer the material from the containment to a 55 gallon drum. Once the cleanout is complete, the drums of waste sulfuric acid are transferred to the less than 90 day storage pad immediately. This area is across the road from Power Island, between Phase I and Phase II. The drums are picked up by a hazardous waste management company. The waste sulfuric acid is shipped offsite in less than 90 days.

The facility has developed an Incident Management Plan, SunCoke procedure number F-7019. The procedure addresses medical emergencies, evacuation, fire and explosions, chemical spills, and other incidents that may occur onsite. The procedure includes a Crisis Management Team Notification, referred to as procedure SCE-HES-PRO-010, which lists the telephone numbers and identifies the roles and responsibilities for each member of the team. However, for this Contingency Plan, the following are SunCoke's Emergency Coordinators:

4.1 PRIMARY EMERGENCY COORDINATOR

Primary Emergency Coordinator

Name: Diana Starkweather
Title: Environmental Manager
Home Address: 1305 15th Street, Huntington WV 25701
Telephone (Office): 740-355-9823 Telephone (Cell): 740-352-2593

4.2 ALTERNATE EMERGENCY COORDINATORS

Name: Rich Lykins
Title: Safety Manager
Home Address: 704 13th Ave, Huntington WV 25701
Telephone (Office): 740-355-9808 Telephone (Cell): 740-464-8521

Name: Monte Thompson
Title: Heat Recovery Area Manager
Home Address: 2417 Shopes Creek Road, Ashland KY 41102
Telephone (Office): 740-355-9820 Telephone (Cell) 740-370-2996

Both the Primary and Alternate Emergency Coordinators must:

1. Be familiar with all aspects of this Contingency Plan.
2. Be familiar with all operations and activities at the facility.
3. Be familiar with the location and the characteristics of wastes handled at the facility.
4. Be familiar with the location of records within the facility and the facility layout.
5. Have the authority to commit the resources required to carry out this Contingency Plan.

5. INITIAL REPORTING REQUIREMENTS AND EMERGENCY CONTACT S

5.1 INITIAL REPORTING REQUIREMENTS

- All phone numbers for emergency reporting outlined in this section can be found in Section 5.2.
- In the event of any hazardous waste spill, the guard shack must be contacted immediately.
- If there is a release of hazardous waste or hazardous waste constituents that **leaves the facility property boundary,** the Emergency Coordinator must immediately contact the following:
    - Primary local fire department
    - Local Emergency Planning Committee
    - OEPA 24-hour emergency response hotline
- If there is a release of hazardous waste or hazardous waste constituents that **exceeds the Reportable Quantity** for any released substance, the Emergency Coordinator must immediately contact the following:
    - Primary local fire department
    - Local Emergency Planning Committee
    - OEPA 24-hour emergency response hotline
    - National Response Center (NRC).
- All regulatory notifications must be made **within 30 minutes** of the release. All notifications to the NRC must be made **within 15 minutes**.
- The Fire Department must be contacted if there is a fire or explosion that cannot readily be contained.
- The hospital must be contacted if injuries or other unusual medical conditions are observed during a hazardous waste emergency.
- If there is a release of a hazardous substance that requires an emergency response (see Section 6.1.2), the Emergency Contractor must contact the emergency response contractors for cleanup operations.

5.2 EMERGENCY CONTACT INFORMATION

5.2.1 LOCAL FIRE DEPARTMENTS

Fire (Primary): Green Township Volunteer Fire Company
144 Township Highway 500
Franklin Furnace, Ohio 45629
Non-emergency: (740) 354-9200 (Fire Administration Office)

Fire (Secondary): Elizabeth Township Volunteer Fire Company
PO Box 12
Pedro, Ohio 45659
Non-emergency: (740) 532-5075 (Fire Administration Office)

Police: Hanging Rock Police Department
100 Scioto Avenue
Hanging Rock, Ohio 45638
(740) 532-7652, (Police Administration Office)

Sheriff's Dispatcher: Scioto County Sheriff
1025 16th Street
Portsmouth, Ohio
(740) 355-8261, (Sheriff Administration Office)

5.2.2 LOCAL EMERGENCY PLANNING COMMITTEE

Scioto County LEPC
729 6th Street (Basement)
Portsmouth, OH 45662
740-355-8300 (Office)
740-285-6336 (Mobile)
740-776-6111 (Home)
740-290-7021 (Pager)

5.2.3 STATE EMERGENCY RESPONSE

Ohio EPA Emergency Response Hotline (24 hr): (800) 282-9378

Additional state authorities that may be contacted:

State Police:
State Highway Patrol US
US 23 Hwy S
Portsmouth, Ohio 45662
(740)-354-2888

Regional On-Scene Coordinator:

Southeast District Office
2195 Front Street
Logan, Ohio 43138
(800) 686-7330

5.2.4 FEDERAL – NATIONAL RESPONSE CENTER

National Response Center (24 hr): (800) 424-8802

Additional federal authorities that may be contacted:

EPA Region V Emergency Hotline (24 hr): (312) 353-2318

5.2.5 CLEAN-UP CONTRACTORS

Primary:
IVS Group
15903 Emerson Ave.
Waverly, WV 26184
24 Hour Dispatch: 800-756-0089

Ison Contracting
189 Gervais Rd
Franklin Furnace, OH 45629
(740) 352-1585

Secondary:
Heritage Environmental Services: (317) 243-0811

5.2.6 MEDICAL

Primary Hospital:

Our Lady of Bellefonte Hospital
1000 St. Christopher Drive
Ashland, Kentucky 41101
(606) 833-3333

Medical (Only):

Brown Medical, LLC
1661 State Route 522
Wheelersburg, Ohio 45694
(740) 574-8728

6.1 INITIAL ACTIONS FOR HAZARDOUS WASTE SPILLS OR RELEASE

In the event of a hazardous waste spill, release, explosion or fire, the person identifying the incident must immediately notify the guard shack (9881) and the Emergency Coordinator, listed in Section 4.1. If the Primary Emergency Coordinator is unavailable, the person must notify the Alternate Emergency Coordinators listed under Section 4.2. Any cleanup of a hazardous waste spill or response to an incident must be completed under the direction of the Emergency Coordinator.

The Emergency Coordinator will make the determination whether the release requires an emergency response, or is an incidental release.

The Emergency Coordinator must assess possible hazards to human health or the environment that may result from the hazardous waste release. This assessment must consider both direct and indirect effects of the hazardous waste emergency, and must include, but not be limited to, the effects of any toxic, irritating, or asphyxiating gases that are generated, and the effects of any hazardous surface water run-offs from water or chemicals agents used to control fire and heat-induced explosions.

The Emergency Coordinator is responsible for performing initial notifications, where required to state, local, and federal authorities as set forth in Section 5.1.

6.1.1 INCIDENTAL RELEASES OF HAZARDOUS WASTE

SunCoke defines an incidental release of hazardous waste as a release which:

- Does NOT pose a significant safety or health hazard to employees in the immediate vicinity or to the employees cleaning it up.
- Does NOT have the potential to become an emergency within a short time frame.
- Is limited in quantity, exposure potential, or toxicity and presents minor safety or health hazards to employees in the immediate work area or those assigned to cleanup.
- Is not compounded by another incident such as injury fire.
- The employee(s) in the immediate work area can stop the spill, secure the area and clean up the spill using readily available equipment.

An incidental spill poses an insignificant threat to health or safety and may be safely cleaned up by employees who are familiar with the hazards of the chemicals with which they are working. SunCoke employees with current HAZWOPER awareness training can respond to incidental releases.

6.1.2 HAZARDOUS WASTE EMERGENCIES

SunCoke defines a hazardous waste emergency or a release requiring an "emergency response" as a response which:

1. Comes from outside the immediate release area.
2. Requires evacuation of employees in the area.
3. Poses, or has the potential to pose, conditions that are immediately dangerous to life or health (IDLH).
4. Poses a serious threat of fire or explosion (exceeds or has the potential to exceed the lower explosive limit or lower flammable limit).
5. Requires immediate attention because of imminent danger.
6. May cause high levels of exposure to toxic substances.

Additionally, a release of a hazardous waste will be handled by emergency response if:

1. There is uncertainty about whether the employees in the work area can handle the severity of the hazard with the PPE and equipment that has been provided and the exposure limit could easily be exceeded.
2. The situation is unclear, or data are lacking on important factors

In the event of a release that constitutes an emergency response, SunCoke personnel will evacuate the area. The Emergency Coordinator will contact the emergency response contractor for spill response and cleanup. The emergency response contractor will conduct cleanup operations of the release and all contract employees will be appropriately trained in HAZWOPER response.

6.1.3 FIRE OR EXPLOSION

In the event of a fire or explosion, the employee first observing the incident must immediately notify Plant Security and the Emergency Coordinator. If the fire cannot readily be contained, all employees must retreat to safe distance and direct Plant Security to call the Fire Department at 911.

SunCoke has a fire and explosion procedure in the event of such an incident, refer to procedure F-7019. The HRSG wash water, HRSG ash, HRSG ash covered boiler tubes and waste sulfuric acid are not flammable materials and there is a very low risk of fire associated with these wastes. Spent aerosol cans may contain residual flammable materials; however, all waste aerosol cans are kept in closed, steel drums with vapor trap lids and the fire risk is small.

6.1.4 SPILL AND/OR RELEASE REACHING OUTSIDE OF THE FACILITY

The main hazardous waste that could result in a release that extends outside the facility is the HRSG wash water. The wash water is held in a frac tank on the 90 day storage pad prior to shipment for treatment and disposal. The location of the storage area and total volume of the tank(s) (<20,000 gallons) make a release that could extend outside the facility boundary very unlikely. A frac tank spill will be controlled and contained immediately upon discovery to protect the environment, and public health. It is important to note that a spill from the frac tank will not reach a nearby sewer, and/or reach a navigable waterway. SunCoke also maintains an SPCC plan, which outlines additional spill response procedures.

6.2 Initial Reporting Requirements

See section 5.1 for initial reporting requirements.

6.3 During a Hazardous Waste Emergency

During a hazardous waste emergency, the Emergency Coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers. If the facility stops operations in response to a hazardous waste emergency, the Emergency Coordinator must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, as appropriate. If a hazardous waste emergency occurs, as defined in Section 6.1.2, all cleanup and response to the spill or release of a hazardous waste will be conducted by an emergency response contractor.

The Emergency Coordinator must ensure that, in the affected areas of the facility:

1) No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and
2) All emergency equipment listed in this Contingency Plan is cleaned and fit for its intended use before operations are resumed.

6.4 Follow-up After a Hazardous Waste Emergency

Immediately after a hazardous waste emergency, SunCoke will provide for treatment, storage, or disposal of recovered waste, contaminated soil or surface water, or any other material that results from a hazardous waste spill.

The Emergency Plan Coordinator must ensure that, in the affected area(s) of the facility:

1. All waste from the cleanup of a spill and/or release is separated from the stored waste until cleanup procedures are completed; and
2. All emergency equipment listed in Section 8 is available for its intended use before operations are resumed.

6.5 Follow-up Written reports

SunCoke must note in its operating record the time, date, and details of any hazardous waste emergency that requires implementing this Contingency Plan. SunCoke shall prepare a report of the incident and submit the report to the Director of Ohio EPA within fifteen days after the hazardous waste emergency. The report must include:

1) Name, address, and telephone number of the owner or operator;
2) Name, address, and telephone number of the facility;
3) Date, time, and type of incident (e.g., fire explosion);

4) Name and quantity of material(s) involved;

5) The extent of injuries, if any;

6) An assessment of actual or potential hazards to human health or the environment;

7) Estimated quantity and disposition of recovered material that resulted from the hazardous waste emergency.

Additional reporting based on the following type of emergency:

- **In the event of a fire involving hazardous waste**, where the fire department is the only responder, SunCoke will submit a notice of the emergency to the state within two (2) working days. The report shall contain the description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. It is important to note that it is not likely a fire would involve the wash water from the frac tank.
- **In the event of an accidental discharge of hazardous waste to the POTW:** There is little risk that the wash water would enter the sanitary sewer system and be discharged to the POTW. If a spill enters the sanitary sewer, SunCoke will contact the POTW immediately, and provide a written report to the POTW within 5 days.

If area operations were shut down Haverhill must notify Ohio EPA before operations are resumed in the affected area(s) of the facility. Emergency equipment listed in the contingency plan must be de-contaminated prior to putting back in service.

7. CONTINGENCY PLAN SERVICE ARRANGEMENTS (OAC 3745-65-52(C))

In compliance with federal hazardous waste regulations at 40 CFR 265.37 and 265.52(c), a copy of the Contingency Plan with the Preparedness and Prevention Plan and an invitation to visit the facility have been sent to the local entities and authorities (listed in Section 13) that may be involved in an emergency situation. Haverhill operations will coordinate with the following agencies to familiarize agency personnel with the types of hazardous waste handled in the waste storage areas and the potential need for their services. The following describes arrangements with local police departments, fire departments, hospitals, contractors, and Ohio EPA and local emergency response teams. See Section 13 for an emergency service provider mailing list.

The facility has contacted local police, fire, emergency response teams and hospitals and provided them with copies of or portions of the Contingency Plan with the Preparedness and Prevention Plan and relevant background information in an effort to familiarize them with the layout of the facilities, the properties of the hazardous wastes handled at the facility, the associated hazards, entrances to and roads within the site, evacuation assembly areas. These local authorities are invited to visit the facility if they should so desire. If an emergency situation arises at the facility, which cannot be controlled by plant personnel, the Emergency Response Coordinator will notify the appropriate authorities. All contact information for local authorities and contractors can be found in Section 5.2.

Only spills that reach a CERCLA or SARA reportable quantity, result in a fire, explosion, or other spill or release of hazardous waste which could threaten human health ***outside*** the facility property, or enter a surface water will be reported to local and/or federal authorities.

Copies of letters sent to the Emergency Response agencies requesting their coordination in response assistance to emergency situations are located in the environmental files.

7.1 FIRE/POLICE DEPARTMENT

The caller must supply as much information as possible: fire, explosion or release; material(s) involved; location of site; injuries, etc. MSDSs will be provided as appropriate in case of a hazardous waste emergency that involves waste aerosol cans.

Fire Department personnel will provide containment and confinement services until the emergency response contractor arrives. The Fire Department is not responsible for cleanup of spills or of contaminated runoff of water used, e.g., to suppress fire. Communications will be continuously maintained between the Fire Department contact and the Emergency Coordinator.

The Fire Department will coordinate with the Police Department to provide required traffic control, crowd control, or evacuation. Contact information for local fire and police departments is located in Section 5.2.1.

7.2 STATE

If a state notification is required, the facility will use the Ohio 24-hour notification telephone number listed in Section 5.2.3 of this Plan. As required per OAC 3745-65-56(I), a written report will be submitted within 15 days of the incident.

7.3 FEDERAL

If a federal notification is required, the facility will use the contact information in Section 5.2.4 of this Plan.

7.4 EMERGENCY RESPONSE CONTRACTORS

The caller must supply as much information as possible: fire, explosion or release; material(s) involved; location of site; etc. MSDSs will be provided as appropriate in case of a hazardous waste emergency that involves waste aerosol cans. Contractor personnel will provide containment, confinement, and cleanup services. Communications will be continuously maintained between the contractor and the Emergency Coordinator. Contact information for response contractors can be found in Section 5.2.5.

7.5 LOCAL HOSPITAL AND MEDICAL SERVICES

The following medical providers will be notified of the hazards associated with various emergency situations at the facilities, and will be provided a copy of the Contingency Plan and Hazardous Waste Preparedness and Prevention Plan. Contact information for medical providers can be found in Section 5.2.6.

Personnel from the hospital and local ambulance services will be advised of materials handled at the facility and the likely hazards involved. Material Safety Data Sheets and other technical references pertaining to hazardous materials are available from Haverhill for use by medical personnel.

Onsite Medical Service

SunCoke Energy Haverhill is contracted with Brown Medical to perform medical services at the site. Brown Medical will be notified of the hazards associated with various emergency situations at the facility and will be provided a copy of the Hazardous Waste Contingency Plan and Hazardous Waste Preparedness and Prevention Plan.

Personnel from Brown Medical will be advised of materials handled at the facility and the likely hazards involved. Material Safety Data Sheets and other technical references pertaining to hazardous materials are available from Haverhill for use by medical personnel. Brown Medical personnel are onsite 24 hours and can be contacted by calling the guard shack or using the emergency radio channel, channel 9.

Hospital Emergency Information

The caller must supply as much information as possible: fire, explosion or release; material(s) involved; location of site; injuries, etc.; MSDSs as appropriate in case of a hazardous waste emergency that involves waste aerosol cans.

Our Lady of Bellefonte Hospital
1000 St. Christopher Drive
Ashland, Kentucky 41101
(606)-833-3333

8.1 MAINTENANCE AND OPERATION OF FACILITY

The SunCoke Energy Haverhill facility will be operated at all times in a manner which minimizes the potential for fire, explosion or any unplanned or sudden release of hazardous waste. All liquid hazardous wastes are stored on secondary containment. All satellite accumulation areas for aerosol cans are kept under the supervision of an operator during working hours and all hazardous waste handling activities are completed by trained personnel. This plan applies to the following 90-day hazardous waste storage areas located at the facility:

> 90-day hazardous waste storage pad, located next to the Power Island building, between Phase I and Phase II of the plant. All transfer, handling and less than 90 day storage of hazardous wastes is done in this area. All frac tanks for liquid wastes, roll-off bins for non-liquid wastes and full drums of aerosol cans are stored in this area, whenever practicable. The 90-day hazardous waste storage area is constructed with a concrete pad and curbing.

The hazardous waste storage areas must be maintained and operated to minimize the possibility of fire, explosion, or any other release of hazardous waste to the air, soil, or surface water which could threaten human health or the environment. This will be accomplished in the following ways:

a. In order to access the 90-day drum/container hazardous waste areas, personnel must call the Environmental Department at 9823 to make arrangements for placing material in the drum/container hazardous waste areas, and have a portable radio and/or cellular phone on their persons.

b. All employees working in the hazardous waste storage areas shall be trained in the proper handling of the wastes, appropriate personal protection measures, and appropriate emergency response measures, relevant to their normal working responsibilities.

c. Hazardous waste containers, except satellite containers, shall be stored in the less than 90 day storage area, whenever practicable. Hazardous waste containers stored outside of the less than 90 day storage area will incorporate spill control measures.

d. All containers of hazardous waste shall be:

   1. Properly labeled and marked as to their contents;
   2. Oriented so that their labels and markings are readily visible to allow inspections of the containers and their labels; and
   3. Placed with sufficient aisle space to allow the unobstructed movement or access of containers, spill control materials, and fire control equipment.

e. All hazardous waste containers shall be of appropriate type and quality and shall be tightly closed except when wastes are being added or removed.

f. All workers shall extinguish any smoking materials or other open flames before entering storage area.

g. Wastes shall be carried through the work place to the hazardous waste storage container in closed cans, buckets, or drums that are marked as to their contents and which would prevent a spill if tipped or dropped.

h. Wastes shall be handled carefully when being transferred to the frac tank, roll off and/or storage drums/containers.

i. Containers shall be handled carefully to prevent damage to them. Any damaged container shall be evaluated as to its ability to satisfactorily contain the wastes and the wastes shall be transferred to a new container if necessary. Alternatively, damaged drums should be over packed into open-top salvage drums.

j. Spill containment and cleanup materials shall be available on site and shall be used when needed.

k. Inspections of the hazardous waste storage areas shall be conducted weekly and following any emergency response. Equipment shall be visually inspected and maintained. These inspections shall include and record the status of at least the following:

   1. Condition of all containers including their closure condition, labels, and any damage or signs of corrosion or leakage. Items to be inspected should include the number of containers in storage, how long they have been in storage, and any observations of any problems or abnormal conditions with containers or other storage area characteristics, noting which drum(s) had the problem(s).

   2. Condition and completeness of all container labeling and marking. Particular attention should apply to the accumulation dates and amounts of hazardous waste stored.

   3. The inspector should also note if there are any hazardous waste containers that have been in storage for an extended time period (approaching the 90-day limit).

l. Hazardous waste container inspection records shall be completed by the Environmental Department on a weekly basis for all containers of hazardous waste. Inspection records shall be maintained by the Environmental Department for a period of at least three years. Any abnormal conditions shall be reported to the Environmental Department in a timely manner. Any inspections noting leakage or potential leakage of hazardous waste, or any other conditions that may result in danger to personnel or the environment, shall be reported to the Environmental Department immediately. The Environmental Department shall also note from the inspection reports if storage times and/or amounts are nearing the allowable limits, and make the proper arrangements to dispose of the waste before these limits are exceeded.

8.2 REQUIRED EQUIPMENT

The following materials and equipment are used in the hazardous waste storage areas.

8.2.1 TOOLS AND EQUIPMENT

a. Mobile equipment is available at various locations onsite if needed.

b. Additional PPE and chemical protective clothing is readily available in the warehouse or PPE storage area in the Administration Building.

c. Sufficient lighting to allow safe working conditions at all times wastes are being handled in the waste storage area. If artificial lighting is not available, wastes will only be handled in the storage area during daylight hours.

d. Appropriate tools for handling the containers of waste are available onsite.

8.2.2 INTERNAL COMMUNICATIONS

SunCoke uses handheld two-way radios to provide emergency instructions to site personnel. Handheld radios are also given to any contractors working onsite that do not work directly with SunCoke personnel.

In the event of an emergency, phone lines are available at the guard shack to summon emergency assistance from local police departments, fire departments or state and local response teams. Additional phones are located in the administration building and the plant control room.

8.2.3 FIRE, SPILL PROTECTION AND MOBILE EQUIPMENT

8.2.3.1 PORTABLE FIRE EXTINGUISHERS

Multiple portable extinguishers are located near all production equipment. Each extinguisher is inspected monthly. There is a fire extinguisher near the less than 90 day storage area.

8.2.3.2 SPILL PROTECTION EQUIPMENT

Spill Kits are location throughout the facility and are inspected regularly. In the event of a release from the less than 90 days storage area, spill kits can be used to clean up the spill.

8.3 TESTING AND MAINTENANCE OF EQUIPMENT

SunCoke performs a drill on an annual basis with the local emergency response agencies to test emergency response systems. Additionally, the fire water system is tested on a regular basis.

The spill kits around the site are inspected on a quarterly basis to ensure that spill response materials are available and that the kits are complete with proper response materials.

8.4 Access to Communication or Alarm System

At any time hazardous waste is being handled onsite, all personnel involved with the waste handling will have handheld radios on their person so they may contact the guard shack if any emergency arises or any spill occurs.

8.5 Aisle Space

SunCoke does not store more than a few drums or containers in the less than 90 day storage area at any given time; however, in the event that drums or containers are stored in the area, personnel inspecting the less than 90 day storage area will ensure that there is sufficient space between drums to allow for room to inspect the condition of each drum and ensure proper labeling.

8.6 Arrangements with Local Authorities

See Section 7 for more information regarding Contingency Plan Service Arrangements.

9.1 EMERGENCY EXITS

Attachment B contains a sketch of the site plans for the building exit routes and exit locations. The emergency exits for buildings are marked by lighted "EXIT" signs, which have battery backup in case of power failure. Interior doors along exit routes are marked by "EXIT" signs and have emergency lights overhead with battery backup.

9.2 COMMUNICATION SYSTEM

See Section 8.2.2 for information on available employee communications equipment.

9.3 FIRE, SPILL PROTECTION AND MOBILE EQUIPMENT

9.3.1 PORTABLE FIRE EXTINGUISHERS

Multiple portable extinguishers are located near all production equipment, as well as in the offices. Each extinguisher is inspected monthly. There is a fire extinguisher near the less than 90 day storage area and near each waste aerosol satellite accumulation area.

9.3.2 GENERAL FIRE PROTECTION

A six (6) inch water main supplies 25 fire hydrants on site. In addition, Haverhill Chemicals has a backup water source with an eight (8) inch fire water supply and a redundant loop system. Haverhill Chemicals has diesel fuel emergency generators and three (3) 3,000 gallons per minute each diesel powered water pumps with three (3) water supply storage tanks of a million gallons each.

There are fire detection systems in the Administration Building, Main Substation Phase I & II, and Power Island. Fire suppression systems are located in Power Island. There are three (3) wet and one (1) pre-action system. An independent fire water pump can supply up to 2,000 gallons of water per minute.

The HRSG related waste streams and sulfuric acid waste do not pose a fire hazard; however, waste aerosol cans are flammable. The fire protection systems are designed primarily for the main process.

9.3.3 SPILL PROTECTION AND MOBILE EQUIPMENT

The HRSG wash water, ash and ash covered boiler tubes do not require special spill response equipment. In the event of an incidental release of HRSG wash water, SunCoke will use earth moving equipment to construct a temporary berm to contain the spilled materials.

Waste sulfuric acid must be cleaned up using spill kit materials designed for acid spills. In addition, proper PPE designed for handling corrosive materials must be donned while responding to a waste

sulfuric acid spill. Spill kit materials for acid spills are available in Power Island, near the sulfuric acid containment.

Any materials contaminated during a spill of any hazardous waste generated at the site will be excavated, properly disposed of and visually inspected to ensure that all contaminated material is removed. The emergency response contractor will be called to assist with spill cleanup efforts for larger spills, if necessary. SunCoke maintains the following equipment onsite at all times and this equipment is available in the event of a spill or hazardous waste emergency. Additionally, generators or other heavy equipment may be available onsite. The Emergency Coordinator may contact the maintenance department if additional equipment is needed. The equipment listed below is mobile and moves around the site as needed for plant purposes.

4 – Front-end Loaders
1 – Excavation Trencher
4 – Bobcats
1 – Bulldozer

9.4 DECONTAMINATION

If personnel come in contact with the waste liquid, personnel would need to take a shower to clean off any residue from the spilled waste.

Any equipment that is used in a hazardous waste emergency will be cleaned after use and the decontaminated material will be properly disposed.

9.5 FIRST AID STATIONS

First aid stations are located throughout the facility and at the Guard Shack.

9.6 EMERGENCY RESPONSE EQUIPMENT AND MATERIALS

Emergency response equipment is available in the immediate work area to the employees who have been trained in the response actions required for a release of hazardous waste and/or hazardous material.

a. The equipment and material to be used to respond to an incidental release involving hazardous waste is in work areas, designated 90-day hazardous waste storage areas, and/or warehouse. This equipment and material includes the following:

1. Fire extinguishers - *to extinguish chemical fires*
2. Goggles - *to protect eyes from liquids and solids*
3. Protective gloves - *to protect hands from solids and liquids*
4. Shovel - *to build containment features and clean up solid material*
5. Broom - *to clean up solid material*
6. Duct tape - *to seal PPE, hold plastic sheeting and provide temporary repairs of containers or equipment*

b. Other items available for incident response, but located in the warehouse and or near the hazardous waste storage areas include:

1 Over-pack drum - *overpack another drum or contain spill cleanup wastes*
2. Tyvek suits - *for protection against hazardous solids*
3. Paper towels - *to help clean up liquids and assist with decontamination*
4. Plastic garbage bags - *to contain spent spill cleanup materials*
5. Noncombustible absorbent material - *to clean up spills of liquids*
6. Face shields - *to provide full-face splash protection*

c. Other spill response equipment and materials are available in other locations at the facility to respond to spills of petroleum and chemicals. Emergency Spill Kits are provided at locations throughout the site for use by all employees and contractors.

The Incident Management Plan describes the actions to be taken for an evacuation, refer to procedure number F-7019. The following is a brief summary of the Incident Management Plan.

10.1 PRIMARY EVACUATION ROUTES

All buildings are posted with an emergency exit route and the location of the assembly area. In the event an exit is blocked, employees will proceed to the next nearest accessible exit and leave the building. Once employees leave a building, they are to meet in the assembly area. The assembly area is located under the light pole in the administration parking lot. The assembly area is marked with a sign that states "Emergency Evacuation Assembly Area". Copies of the evacuation routes are located in Appendix C.

10.2 EVACUATION SIGNALS

The plant personnel are equipped with radios. Employees will be instructed by radio to follow the evacuation procedure.

Operating Equipment: In the event of an evacuation, Machine Operators should follow normal shutdown procedures and eliminate power to each machine.

10.3 EVACUATION PROCEDURE

All employees are to leave their area via the nearest accessible exit. All employees are to meet at the assembly area. A supervisor(s) will account for all employees and contractors. A headcount will be performed. No employee is to leave the assembly area until instructed to do so.

SunCoke conducts waste management training per the RCRA requirements. Certain employees at the SunCoke Haverhill site have responsibilities for hazardous waste handling and management. The nature and amount of training and descriptions and requirements is briefly outlined below. This training plan has been prepared in compliance with the following requirements of the federal hazardous waste regulations found in 40 CFR:

- Large Quantity Generator (LQG) hazardous waste accumulation 40 CFR 262.34 (a)(4), which requires meeting 40 CFR 265.16 Personnel Training requirements;
- RCRA/DOT training 40 CFR Part 262 Subpart C Pre Transportation Requirements and 49 CFR 172.704 Training Requirements; and/or,
- Satellite accumulation 40 CFR 262.34 (c) and/or Small Quantity Handler of universal waste 40 CFR 273.16 Employee Training.

11.1 EMPLOYEES HANDLING HAZARDOUS WASTE

11.1.1 JOB TITLES AND DESCRIPTIONS

All employees on the SunCoke Energy Haverhill site that participate in Hazardous waste management activities are listed below. All SunCoke Energy Haverhill Employees are trained at the HAZWOPER awareness level, in addition to RCRA required training.

11.1.1.1 ENVIRONMENTAL MANAGER/ENVIRONMENTAL ENGINEER

The Environmental Manager or Environmental Engineer is responsible for ensuring that all hazardous wastes generated onsite are properly characterized, handled and disposed of. They are responsible for scheduling wastes for shipment, preparing wastes for shipment per RCRA and DOT, inspecting the less than 90-day storage area, and ensuring that all necessary labels and other materials are available for the proper storage and handling of hazardous wastes. The EM receives annual RCRA training as outlined in Section 11.2.3 below and the table in Appendix E.

11.1.1.2 HEAT RECOVERY SUPERVISOR AND SUPPORT SUPERVISORS

The heat recovery supervisor and any support supervisor who is tasked with hazardous waste management responsibilities will also be responsible for inspecting the less than 90-day storage area and for preparing wastes for shipment. These personnel will receive annual RCRA training as outlined in Section 11.2.3 below and the table in Appendix E.

11.1.1.3 UTILITY AND MAINTENANCE PERSONNEL

At times, some utility or maintenance personnel will be tasked with moving a 55-gallon drum of hazardous waste from a satellite accumulation area to the less than 90-day storage area. (The Environmental Manager/Engineer will prepare all drums and containers for shipment). Utility and maintenance personnel may also place used aerosol cans in satellite accumulation drums. Utility and maintenance personnel receive training as described in Section 11.2.2 below and the table in Appendix E.

11.1.1.4 CONTRACTOR PERSONNEL

Contractor personnel are responsible for transferring hazardous waste into onsite storage containers and for assisting with the transfer of hazardous waste to the transport company. This is done under the supervision of the Environmental Manager. Contractor personnel receive training as described in section 11.2.2 below.

11.1.1.5 OPERATIONS AND PRODUCTION TECHNICIAN PERSONNEL

Operations and production personnel will not be involved in handling of hazardous wastes onsite. Their only task involving hazardous waste will be placing used aerosol cans into satellite accumulation area drums. Operations and Production Technician personnel receive at least the training described in section 11.2.1 below.

11.2 RCRA TRAINING

The facility has instituted the following personnel training programs for those individuals who handle or manage waste. Training includes classroom and on-the-job training. Additional on-the-job and/or safety training is provided on a regular basis (i.e., area inspections, safety meetings, etc.).

A representative of the HES Department, trained in hazardous waste management procedures directs the training. The type and quantity of training given to each employee is relevant to the employee's hazardous waste management tasks commonly part of his/her employment position. Training may be provided in separate areas as required.

This training is offered to new hires within six months of their initial employment at the facility, and annually thereafter to all applicable personnel. The training summarizes the RCRA regulations, focusing in detail on areas directly related to 90-day storage areas hazardous waste management and spill response measures at the facility. Required requisite skills, education, and qualifications include classroom and on-the-job training for operation and management of the 90-day hazardous waste storage areas and/or emergency response.

A training matrix is included in Appendix E, which shows additional training requirements by job title for other positions and those as described in this section. Training sessions may be done all at once, or during multiple training sessions throughout the year. Specialized or additional training (such as DOT) may also be completed by a qualified third-party consultant.

11.2.1 RCRA AWARENESS TRAINING

All SunCoke employees receive annual general RCRA awareness training, including emergency procedures, location of emergency response equipment, hazards of materials and evacuation procedures. In addition, all SunCoke employees receive awareness training on handling of universal wastes generated at the site including fluorescent bulbs and HID lamps, batteries and mercury containing devices.

11.2.2 RCRA HAZARDOUS WASTE MANAGEMENT TRAINING FOR DRUM HANDLERS & EMPLOYEES WHO PLACE WASTE INTO FRAC TANK

SunCoke employees who place waste into the frac tank and/or move 55-gallon satellite accumulation containers from the satellite area to the less than 90-day accumulation area must be trained to add waste to the frac tank and move the satellite drums. The training includes a review of this Contingency Plan, spill response, and a review of the health and environmental concerns of each type of hazardous waste generated and managed onsite. SunCoke may use contractors to perform these duties, but the contractors require this training too. If outside contractors are used, SunCoke will provide the contract company with the necessary information for training. SunCoke requires that any contract company whose employees work with hazardous wastes must train their employees.

11.2.3 RCRA HAZARDOUS WASTE MANAGEMENT TRAINING FOR THE LESS THAN 90-DAY ACCUMULATION AREA

SunCoke employees who manage the hazardous waste in the less than 90-day accumulation area must have hazardous waste management training. The training includes a review of this Contingency Plan and a review of the health and environmental concerns of each type of hazardous waste generated and managed onsite. This training also includes handling of used oil and universal wastes at the site. Employees receive initial classroom training and annual classroom training thereafter. SunCoke may use contractors to perform the duties required in the management of hazardous waste, but the contractors must be trained. If contractors are used, SunCoke will provide the contract company with the necessary information training. SunCoke requires that any contract company whose employees work with hazardous wastes to train their employees.

11.2.4 TRAINING RECORDS

Training records are stored on the SunCoke Network.

12. AMENDMENTS TO CONTINGENCY PLAN

This Plan must be reviewed, and immediately amended, if necessary, whenever:

- Applicable regulations are revised;
- The plan fails in an emergency;
- The facility changes, in its design, construction, operation, maintenance, or other circumstances, in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
- The list of Emergency Coordinators changes; or
- The list of emergency equipment changes.

A copy of this Plan has been submitted to all the local police departments, fire departments, hospitals, state and local emergency response teams that may be called upon to provide emergency services. Copies of the certified mail receipts are filed with this Plan.

Name and Address	Date Mailed
Scioto County LEPC 729 6th Street (Basement) Portsmouth, OH 45662 (740) 393-6772	
Hanging Rock Police Department 100 Scioto Avenue Hanging Rock, Ohio 45638 (740) 532-7652, (Police Administration Office)	
Scioto County Sheriff 1025 16th Street Portsmouth, Ohio (740) 355-8261, (Sheriff Administration Office)	
Ohio State Highway Patrol Portsmouth Patrol Post US Route 23 Lucasville, OH 45648 (740)-354-2888	
Green Township Volunteer Fire Company 144 Township Highway 500 Franklin Furnace, Ohio 45629 Non-emergency: (740) 354-9200 (Fire Administration Office)	
Our Lady of Bellefonte Hospital 1000 St. Christopher Drive Ashland, Kentucky 41101 (606)-833-3333	
Elizabeth Township Volunteer Fire Company PO Box 12 Pedro, Ohio 45659 Non-emergency: (740) 532-5075 (Fire Administration Office)	
Brown Medical, LLC 1661 State Route 522 Wheelersburg, Ohio 45694 (740) 574-8728	

NOTICE OF REGULATED ACTIVITY – STATUS CHANGE

EMERGENCY NOTIFICATION WORKSHEET (OAC3745-65-56)

NOTIFICATION WORKSHEET

Initial telephone notification

FACTS YOU WILL NEED TO KNOW:

I. Facility Name: SunCoke Energy - Haverhill Operations

1. Facility address:

   2446 Gallia Pike
   Franklin Furnace, Ohio 45629

2. Facility Telephone Number:

   740-355-9800

3. Responsible Party:

   Mr. John Essman (General Manager)

4. Environmental Contact:

   Diana Starkweather
   Telephone Number: 740-355-9823 or 740-352-2593

II. Agency name and telephone number of Agency Contacted:

_____

III. Information to include with the report:

1. Name of the employee filing the report: _____
2. Date, time of the incident: _____
3. Type of incident (e.g., fire, explosion): _____
4. Name and quantity of material(s) involved: _____
5. The extent of injuries, if any: _____
6. An assessment of actual or potential hazards to human health or the environment, where this is applicable: _____
7. Estimated quantity and disposition of recovered material that resulted from the incident:

   _____

A SKETCH OF THE EVACUATION ROUTES (MAP)

FIRE EXTINGUISHER AND SPILL KIT LOCATIONS

ATTACHMENT F: FGD Baghouse Dust Profile

Sample Summary

Client: SunCoke Energy-Haverhill Operations
Order Number: 1304551

Laboratory ID	Client ID	Matrix	Sampling Date
1304551-01	HH1 & 2 Fly Ash Comp	Solid	3/13/2013

Report Narrative

Client: SunCoke Energy-Haverhill Operations

Order Number: 1304551

Solid sample results are reported on a wet weight basis except as noted.
No problems were encountered during analysis of this order number, except as noted.

Data Qualifiers:
B = Analyte found in the method blank
J = Estimated concentration of analyte between MDL (LOD) and Reporting Limit (LOQ)
C = Analyte has been confirmed by another instrument or method
E = Analyte exceeds the upper limit of the calibration curve.
D = Sample or extract was analyzed at a higher dilution
X = User defined data qualifier.
S = Surrogate out of control limits
U = Undetected
a = Not Accredited by NELAC

ND = Non Detected at LOQ
DF = Dilution Factor

Limit Of Quantitation (LOQ) = Laboratory Reporting Limit (not adjusted for dilution factor)
Limit Of Detection (LOD) = Method Detection Limit
Practical Quantitation Limit (PQL) = (same as LOQ)
Method Detection Limit (MDL) = (same as LOD)
Reporting Detection Limit (RDL) = (same as LOD)

Matrices:
A = Air
C = Cream
DW = Drinking Water
L = Liquid
O = Oil
SL = Sludge
SO = Soil
S = Solid
T = Tablet
TC = TCLP Extract
WW = Waste Water
W = Wipe

Estimated uncertainty values are available upon request.

The test results meet the requirements of the NELAC standard, except where noted. The information contained in this analytical report is the sole property of Summit Environmental Technologies, Inc. and that of the client. It cannot be reproduced in any form without the consent of Summit Environmental Technologies, Inc. or the client for which this report was issued. The results contained in this report are only representative of the samples received. Conditions can vary at different times and at different sampling conditions. Summit Environmental Technologies, Inc. is not responsible for use or interpretation of the data included herein.

SUMMIT
ENVIRONMENTAL TECHNOLOGIES, INC.
Analytical Laboratories

March 25, 2013

Client: SunCoke Energy-Haverhill Operations
Address: 2446 Gallia Pike
Franklin Furnace, OH 45629

Received: 3/15/2013
Project #: Waste Profiling

TCLP Volatiles

Client ID#	Lab ID#	Collected	Analyte	Rep Lmt	Result	Units	Matrix	Method	DF	RegLvl	Run	Analyst
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	1,1-Dichloroethene	0.1	ND	mg/L	S	1311	1	0.7	20-Mar-13	MS
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	1,2-Dichloroethane	0.1	ND	mg/L	S	1311	1	0.5	20-Mar-13	MS
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	2-Butanone (MEK)	2	ND	mg/L	S	1311	1	200	20-Mar-13	MS
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	Benzene	0.1	ND	mg/L	S	1311	1	0.5	20-Mar-13	MS
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	Carbon Tetrachloride	0.1	ND	mg/L	S	1311	1	0.5	20-Mar-13	MS
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	Chlorobenzene	0.1	ND	mg/L	S	1311	1	100	20-Mar-13	MS
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	Chloroform	0.1	ND	mg/L	S	1311	1	6	20-Mar-13	MS
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	Tetrachloroethene	0.1	ND	mg/L	S	1311	1	0.7	20-Mar-13	MS
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	Trichloroethene	0.1	ND	mg/L	S	1311	1	0.5	20-Mar-13	MS
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	Vinyl Chloride	0.2	ND	mg/L	S	1311	1	0.2	20-Mar-13	MS

TCLP BNA

Client ID#	Lab ID#	Collected	Analyte	Rep Lmt	Result	Units	Matrix	Method	DF	RegLvl	Run	Analyst
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	1,4-Dichlorobenzene	0.1	ND	mg/L	S	1311	1	7.5	22-Mar-13	AE
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	2,4,5-Trichlorophenol	0.25	ND	mg/L	S	1311	1	400	22-Mar-13	AE
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	2,4,6-Trichlorophenol	0.25	ND	mg/L	S	1311	1	2	22-Mar-13	AE
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	2,4-Dinitrotoluene	0.1	ND	mg/L	S	1311	1	0.13	22-Mar-13	AE
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	Cresols	5	ND	mg/L	S	1311	1	200	22-Mar-13	AE
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	Hexachloro-1,3-butadiene	0.1	ND	mg/L	S	1311	1	0.5	22-Mar-13	AE
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	Hexachlorobenzene	0.1	ND	mg/L	S	1311	1	0.13	22-Mar-13	AE
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	Hexachloroethane	0.1	ND	mg/L	S	1311	1	3	22-Mar-13	AE
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	Nitrobenzene	0.1	ND	mg/L	S	1311	1	2	22-Mar-13	AE
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	Pentachlorophenol	0.25	ND	mg/L	S	1311	1	100	22-Mar-13	AE
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	Pyridine	0.25	ND	mg/L	S	1311	1	5	22-Mar-13	AE

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Web Site: www.sette.com

SUMMIT
ENVIRONMENTAL TECHNOLOGIES, INC.
Analytical Laboratories

March 25, 2013

Client: SunCoke Energy-Haverhill Operations
Address: 2446 Gallia Pike
Franklin Furnace, OH 45629

Received: 3/15/2013
Project #: Waste Profiling

TCLP Arsenic

Client ID#	Lab ID#	Collected	Analyte	Rep Lmt	Result	Units	Matrix	Method	DF	RegLvl	Run	Analyst
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	TCLP Arsenic	0.5	ND	mg/L	S	1311	1	5	21-Mar-13	VVK

TCLP Barium

Client ID#	Lab ID#	Collected	Analyte	Rep Lmt	Result	Units	Matrix	Method	DF	RegLvl	Run	Analyst
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	TCLP Barium	5	ND	mg/L	S	1311	1	100	21-Mar-13	VVK

TCLP Cadmium

Client ID#	Lab ID#	Collected	Analyte	Rep Lmt	Result	Units	Matrix	Method	DF	RegLvl	Run	Analyst
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	TCLP Cadmium	0.1	ND	mg/L	S	1311	1	1	21-Mar-13	VVK

TCLP Chromium

Client ID#	Lab ID#	Collected	Analyte	Rep Lmt	Result	Units	Matrix	Method	DF	RegLvl	Run	Analyst
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	TCLP Chromium	0.2	ND	mg/L	S	1311	1	5	21-Mar-13	VVK

TCLP Lead

Client ID#	Lab ID#	Collected	Analyte	Rep Lmt	Result	Units	Matrix	Method	DF	RegLvl	Run	Analyst
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	TCLP Lead	0.5	ND	mg/L	S	1311	1	5	21-Mar-13	VVK

TCLP Mercury

Client ID#	Lab ID#	Collected	Analyte	Rep Lmt	Result	Units	Matrix	Method	DF	RegLvl	Run	Analyst
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	Mercury	0.002	ND	mg/L	S	1311	1	0.2	21-Mar-13	ALJ

TCLP Se

Client ID#	Lab ID#	Collected	Analyte	Rep Lmt	Result	Units	Matrix	Method	DF	RegLvl	Run	Analyst
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	TCLP Selenium	0.5	ND	mg/L	S	1311	1	1	21-Mar-13	VVK

TCLP Silver

Client ID#	Lab ID#	Collected	Analyte	Rep Lmt	Result	Units	Matrix	Method	DF	RegLvl	Run	Analyst
HH1 & 2 Fly Ash Composite	1304551-01	13-Mar-13	TCLP Silver	0.5	ND	mg/L	S	1311	1	5	21-Mar-13	VVK

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Web Site: www.setlek.com

ATTACHMENT G: Inspection Checklist

Smoke Energy 5/13/2014

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, did the generator:	
	a.	Sign item 20 of the new manifest or item 18c of the original manifest? [3745-52-23(F)(1)	Yes ☐ No ☐ N/A ☐
	b.	Provide the transporter a copy of the manifest? [3745-52-23(F)(2)]	Yes ☐ No ☐ N/A ☐
	c.	Send a copy of the manifest to the designated facility that returned the shipment with 30 days after delivery of the rejected shipment? [3745-52-23(F)(3)]	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: A generator who sends a shipment of hazardous waste to a TSD facility with the understanding that the TSD facility can accept and manage the waste and later receives that shipment back as a rejected load or residue may accumulate the waste on-site for <90 days or <180 days depending on the amount of hazardous waste on-site in that calendar month. [3745-52-34(M)]			
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 refresher training to employees during each period from January 1st to December 31st and does each training occur within 15 months after the previous training? [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

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 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)] 2 frac tank lids open during inspection - later closed	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 at least once during the period from Sunday to Saturday? [3745-66-74]		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 ☐
NOTE: Continue with the generator LDR requirements on the next page.		