RECEIVED
FEB 19 1993
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

RECEIVED
WMD RCRA
RECORD CENTER
APR 13 1993

Sylvester
2-22-93

TSD - RCRA INSPECTION REPORT

(Interim Status Facility - 329 IAC 3.1.10)

EPA ID # IND 016 360 265 **NAME** American Chemical Service, Inc.

MAILING ADDRESS: P.O. Box 190
Griffith, Indiana 46319

LOCATION ADDRESS: 420 South Colfax Avenue
Griffith, Indiana 46319

CONTACT: Mr. James Murphy **PHONE:** 219/924-4370

OWNERSHIP: American Chemical Service, Inc. **COUNTY:** Lake

STATUS CODE: 1 1=Active 3=Dead Mail 4=PCB Handler 6=Non-Handler 2=Obsolete ID # 9=Superfund site 5=Out-of-Business

Person(s) interviewed:	Title:	Telephone:
James Murphy	Plant Manager	Above

Inspector(s):	Agency:	Telephone:
Rick Roudebush	Environmental Mgr.II	317/233-4637
Marc Herdrich	Environmental Mgr.II	317/232-8553

Date of inspection: December 2, 1992 **Time of Inspection:** 2pm

Hazardous Waste Management Permit Program and Related Hazardous Waste Requirements, 329 IAC 3.1, incorporates by reference federal standards for the management of hazardous waste which have been published in the code of federal regulations in 40 CFR 260 through 40 CFR 270 as of July 1, 1990. Citations contained in this inspection form shall be to the federal rules as incorporated, except where the State rule substitutes full text language, in which case the specific 329 IAC 3.1 citation will be used.

Installation Processes by Process Code (EPA Form 3510-3)

S01	✓	Container storage	T03	___	Incinerator treatment
S02	✓	Tank storage	T04	✓	Other treatment
S03	___	Waste pile storage	D79	___	Injection well disposal
S04	___	Surface impoundment storage	D80	___	Landfill disposal
T01	___	Tank treatment	D81	___	Land application disposal
T02	___	Surface impoundment treatment	D83	___	Surface impoundment disposal

If Part A process codes are listed above as T04 please describe the process involved below:

There is no longer any tanks or treatment on-site
The facility is currently going through closure.

1) Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

2) Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

3) Type of Operation, Products Manufactured, Processes Utilized, Size of Operation, Concentrate on processes that produce waste (hazardous or nonhazardous)!

American Chemical Service, Inc. produces oil and gas additives, as well as, plasticizers, Hazardous Waste are currently produced from filtration processes, product intermediates and bottom solids from railroad car tanks. The facility discontinued TSD activities in 1990.

4) If any of the wastes are managed in the manners listed below, please check those areas and utilize the provided appendices.

		YES	NO
A)	**Waste Oil Fuel** - Appendix A	___	✓
B)	**Lead Acid Batteries**	___	✓
C)	**Hazardous Waste Fuel** - Appendix C	___	✓
D)	**Precious Metals**	___	✓
E)	**Use Constituting Disposal**	___	✓
F)	**Tanks**	___	✓ see above

		YES	NO
G)	Use and Management of Containers	✓	
H)	Generator Accumulation Appendix	✓	
I)	Waste Pile		✓
J)	Surface Impoundment		✓
K)	Landfill		✓
L)	Process Vents		✓
M)	Equipment Leaks		✓

5) Hazardous Waste Streams/EPA #	Source	Rate	Disposition	LDR Treatability Group (WW/NWW)
D001 (D035, D039 D040) filtration process	filtration processes	~ 10-15/55 gallon drums/3 months	Marine Shale Processors, La.	NWW
F001/F002/F003/F005	filtration/ tank bottoms	1-55 gallon drum/3-4 days	above	NWW

	YES	NO	NA
6) Have both listed and characteristic waste codes been assigned, where a listed waste exhibits a characteristic? 40 CFR 268.9	✓		
7) Does the facility handle any California List Wastes? (liquid hazardous waste with greater than 50 ppm PCB greater than 134 ppm nickel greater than 130 thallium, etc.)	✓		

8) List all wastes not listed above.

Waste	Process Generating Waste	Rate	Disposition

9) If the company claims a reuse or reclaim exemption please include the following information:

	Waste Type	Generation Rate	How reclaimed & by Who	Quantity stored on Site
A.	NA			
B.				

10) Hazardous Waste

On-Site	Amount	How Stored	Comments
D001 (D035/D039/D040) filter solids	42	55 gallon drums	
F001/F002/F003/F005 RR Tank bottoms	20	55-gallon drums	
F001/F002/F003/F005 *Clean up debris from closure	39	55 gallon drums	*See page #6 item #3

11) Indicate any TSD activities which have been omitted from or are not clear on the facility map (for the purpose of determining if expansion has occurred)
(40 CFR 270.13) (HWIMS 610)

NA

12) Is the Biennial Report Accurate? See additional comments below.

13) Note any non-RCRA Violations (Open Dumping, Dumping in City Sewer Without Pretreatment Program, OSHA, etc.)

None

14) Additional Comments:

#12) The facility could not find the 1991 biennial report, so I can not verify if the report is accurate, however a check of records at IDEM indicate American Chemical Service, Inc. did submit a 1991 biennial report.

LAND BAN TREATMENT STANDARDS

	HWIMS 700	OK	DF	NI	NA
1)	Does generator dilute prohibited wastes to meet treatment standard criteria, or render them nonhazardous, as a substitute for adequate treatment? 40 CFR 268.3	✓ No			
2)	Do treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? 40 CFR 268.9	✓			
3)	Does generator specify alternative treatment standards for lab packs or F039 leachate? If yes, see 40 CFR 268.42(c)(2)				✓
4)	Does generator mix wastes with different treatment standards for a constituent of concern? If yes, did generator select most stringent treatment standards?	✓ No			
5)	Does the generator handle any wastes with a LDR variance (national capacity, case-by-case, etc.)?	✓ No			

ON-SITE TREATMENT

	HWIMS 700	OK	DF	NI	NA
1)	Does the generator treat wastes in 90-day tanks or containers? If NA, go to next section.				✓ No longer doing TSD.
2)	Does the generator treat the wastes to meet appropriate treatment standards?				
3)	If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)				
4)	Does the plan fulfill the following:				
	-Based on a detailed chemical and physical analysis of a representative sample				
	-Contains information necessary to treat the wastes in accordance with LDR				
5)	Has the plan been filed with the Regional Administrator or IDEM?				
6)	Are characteristic wastes which have been rendered nonhazardous shipped to a Subtitle D facility?				
	a. If yes, is a notification and a certification for each shipment sent to the Regional Administrator (prior to 2/24/92) or IDEM? 40 CFR 268.9(d)(1) and 268.7(b)(5)				

STORAGE (HWIMS)

		OK	DF	NI	NA
1)	Is the amount of hazardous waste in the storage area(s) equal to or less than the capacity allowed in the Part A? List type and amount of any storage capacity overages? 40 CFR 270.72	✓			
2)	Are all containers clearly marked to identify the contents and date(s) entering storage or is such information available in the operating log? 40 CFR 268.50(a)(2)(i)	✓			
3)	Have wastes been stored for less than one year?		✓ *		
4)	If no, can the facility show that such storage is necessary to facilitate proper recovery, treatment, or disposal. 40 CFR 268.50(c)		✓ NO		

* See Description of Violations (DOV) #

TREATMENT (HWIMS)

		OK	DF	NI	NA
1)	Does the facility treat hazardous waste other than in 90-day tanks and containers? If NA, go to next section.				✓
2)	Are required technologies used to treat wastes which have treatment standards expressed as technologies? 40 CFR 268.40(b) (HWIMS)				
3)	Are alternative methods approved? 40 CFR 268.2				
4)	Is the LDR treatment standard lower than the Characteristic level?				
5)	If yes, does the facility manage the waste as restricted until treatment standards are met? 40 CFR 268.9				
6)	Does the facility test residues from all treatment processes? 40 CFR 268.7				

General Facility Standards (paperwork)

		OK	DF	NI	NA
1)	Has the Regional Administrator/Environmental Management Board been notified regarding:				
a.	Receipt of hazardous waste from a foreign source? 40 CFR 265.12(a) (HWIMS 300)				✓
b.	Facility expansion? 40 CFR 270.72(b) (HWIMS 610)				✓
c.	Change of owner or operator? 40 CFR 265.12(b) (HWIMS 300)				✓

2) General Waste Analysis: (HWIMS 310)

a.	Has the owner or operator made a detailed chemical and physical analysis of the waste either through testing of knowledge of the process? 40 CFR 265.13(a)1	✓			
b.	Does the owner or operator have a detailed waste analysis plan on file at the facility? 40 CFR 265.13(b)	✓			
	Does the waste analysis plan contain:				
	1. parameters (and rationale for their choice)	✓			
	2. test methods	✓			
	3. sampling method for representative sample	✓			
	4. frequency of analysis (and rationale)	✓			
	5. off-site only: waste analysis from generators	✓			
	6. Additional waste analysis needed (when a change in waste type or process occurs)				
	a. 265.193 Tanks (see above)	✓			
	b. 265.225 Impoundment (same as above)				✓
	c. 265.252 Waste Pile (same as above)				✓
	d. 265.273 Land Treatment (same as above)				✓
	e. 265.341 Incinerators (same as above)				✓

	OK	DF	NI	NA
f. 265.375 Thermal Treatment (same as above)				✓
g. 265.402 Other Treatment (same as above)				✓

c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? 40 CFR 265.13(c) — ✓

d. Is the waste analysis plan followed? _____

3) Owner or Operator Inspections: (HWIMS 320)

a. Does the owner or operator inspect the facility for deterioration, malfunctions, operator errors, and discharges of hazardous waste that may affect human health or the environment? 40 CFR 265.15(a) — ✓

b. Does the owner or operator have an inspection schedule at the facility? 40 CFR 265.15(b)2 — ✓

c. If so, does the schedule address the inspection of the following items: 40 CFR 265.15(b)1

	OK	DF	NI	NA
i. monitoring equipment?	✓			
ii. safety and emergency equipment?	✓			
iii. security devices (including fences)?	✓			
iv. operating and structural equipment (ie. dikes, pumps, etc.)?	✓			
v. type of problems to be looked for during the inspection (e.g. leaky fittings, defective pump, etc.)? 40 CFR 265.15(b)(2)	✓			

	OK	DF	NI	NA
vi. inspection frequency (based upon the possible deterioration rate of the equipment)? 40 CFR 265.15(b)(4)	✓			
vii. Must include:				
1. Weekly container storage? (See 265.174)	✓			
2. Daily and Weekly Tank Storage? (See 265.194)				✓
3. Daily freeboard and weekly dike inspection for surface impoundments? (See 265.226)				✓
4. Landfills, Thermal treatment, Chemical, Physical, and Biological treatment should be inspected as determined by deterioration rate and daily at loading and unloading areas (where spills are likely) [See 265.15(b)(4)				✓
d. Does Owner or Operator follow the written inspection schedule as outlined? 265.15(b)(1)	✓			
e. Are areas subject to spills inspected daily when in use? 265.15(b)(4)	✓			
f. Does the owner or operator maintain an inspection log or summary of owner or operator inspections? 40 CFR 265.15(d)	✓			
g. Does the inspection log contain the following information: 40 CFR 265.15(d)				
i. the date and time of the inspection?	✓			
ii. the name of the inspector?	✓			

	OK	DF	NI	NA
iii. a notation of the observations made?	✓			
iv. the date and nature of any repairs or remedial actions?	✓			

PERSONNEL TRAINING RECORDS

1) Do personnel training records include: (HWIMS 330)

	OK	DF	NI	NA
a. Job titles for the positions related to HWM 40 CFR 265.16(d)1	✓			
b. The name of the employees filling each job title? 40 CFR 265.16(d)(1)	✓			
c. Job descriptions including the required skills, education, or other qualifications and the duties of the personnel assigned to the position? 40 CFR 265.16(d)2	✓			

Check categories for which job titles/descriptions are available (please include the supervisors of each category in that category when reviewing documents).

Emergency coordinator ✓ Training coordinator ___ Emergency response personnel ___
Inspectors ___ Material handlers ✓ Container labelers ___ Manifesters ___
Recordkeepers ___

	OK	DF	NI	NA
d. Description of both introductory and continuing training required for each job? 40 CFR 265.16(d)(3)	✓			

Describe in general the type of training program in use at the facility.

Classroom Basic RCRA safety procedures and site-specific materials (Hazardous Waste) handling, as well as, OJT.

	OK	DF	NI	NA
e. Records of training required in (d)? 40 CFR 265.16(d)4	✓			

	OK	DF	NI	NA
f. Did facility personnel receive the required training including:				
i) classroom or on the job	✓			
ii) within 6 months of hire	✓			
iii) annual review of training?	✓			
g. Are all training records maintained for current personnel and for at least three years for former employees? 40 CFR 265.16(e)	✓			

CONTINGENCY PLAN AND EMERGENCY PROCEDURES (HWIMS 350)

	OK	DF	NI	NA
1) Does the Contingency Plan contain the following information:				
a. The actions facility personnel must take to comply with 265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable).	✓			
b. A description of arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services.	✓			
c. Names, addresses, and phone numbers of all persons qualified to act as emergency coordinators?	✓			
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? 40 CFR 265.52(e)	✓			

	OK	DF	NI	NA
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.) 40 CFR 265.52(f)	✓			
2) Emergency Coordinator:				
a. Is the facility Emergency Coordinator identified? 40 CFR 265.52(d)	✓			
b. Is coordinator familiar with all aspects of site operation and emergency procedures? 40 CFR 265.55	✓			
c. Does Emergency Coordinator have the authority to carry out the Contingency Plan? 40 CFR 265.55	✓			

PREPAREDNESS AND PREVENTION

1) Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility? 40 CFR 265.37 (HWIMS 340)	✓			
2) Are copies of the Contingency Plan available at the site and local emergency organizations? 40 CFR 265.53 (HWIMS 350)	✓			
3) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 40 CFR 265.56 (329 IAC 3-18-7)? (HWIMS 350)	✓			

MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING:

		OK	DF	NI	NA
1)	Use of Manifest System: (HWIMS 360)				
	a. Does the facility follow the procedures listed in 265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	✓			
	b. Are records of past shipments retained for three (3) years? 40 CFR 265.71(b)5	✓			
2)	Has the facility submitted copies of hazardous waste manifests to the Department within five (5) working days after receiving hazardous waste? (This requirements applies to both Indiana's and other states hazardous waste manifests)?	✓			
3)	Does the owner or operator meet requirements regarding manifest discrepancies? (Off-site facilities only) 40 CFR 265.72	✓			
4)	Unmanifested Waste Reports: (applies only to Off-site facilities)				
	a. Has the facility accepted any hazardous waste from an off-site generator subject to 329 IAC 3.1-7-3 (3-8-1) without a manifest or shipping paper? 40 CFR 265.76	✓			
	b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type and date received for each unmanifested hazardous waste shipment.	✓			
	c. Has the facility submitted an unmanifested waste report within 15 days after receiving the waste?	✓			
5)	Closure/Post Closure				
	a. Is the closure plan available for inspection? 40 CFR 265.112(a) (HWIMS 390)	✓			
	b. Is the post-closure plan available for inspection? (for disposal facilities only) 40 CFR 265.118(a) (HWIMS 390)	✓			
	c. Has the closure cost and post closure cost estimate been revised annually to account for inflation. (329 IAC 3.1-14-3) (HWIMS 400)	✓			

		OK	DF	NI	NA
6)	Operating Record: (HWIMS 370)				
a.	Does owner or operator have a operating record? 40 CFR 265.73(a)	✓			
b.	Does the owner or operator maintain an operating record that contains the following information?				
i.	The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR 265 Appendix I (including tanks)? 40 CFR 265.73(b)(1)	✓			

Summarize how the facility tracks the method and date of TSD activity.

_____

_____

ii.	The location and quantity of each hazardous waste within the facility? (This information shall be cross referenced to a specific manifest number if the waste was accompanied by manifest.) 40 CFR 265.73(b)(2)	✓			

Summarize how the facility tracks the location and quantity of waste.

_____

_____

iii.	A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross referenced to specific manifest number, if accompanied by a manifest.) 40 CFR 265.73(b)(2)	✓			
iv.	Records and results of all waste analyses, trial tests, monitoring data, and operating inspections? 40 CFR 265.73(b)(3)(5)(6)	✓			
v.	Reports detailing all incidents that required implementation of the Contingency Plan? 40 CFR 265.73(b)(4)	✓			
vi.	All closure and post closure costs as applicable? 40 CFR 265.73(b)(7)	✓			

vii. Copies of LDR notifications and certifications?
40 CFR 265.73 b (11)(13)(15) ✓ ___ ___ ___

GROUNDWATER MONITORING

40 CFR Subpart F

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

		OK	DF	NI	NA
1)	Has the owner or operator of the facility implemented a groundwater monitoring system? 40 CFR 265.90(a) (HWIMS 380)	___	___	___	✓
2)	Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in 265.90(d)? (HWIMS 380)	___	___	___	✓

APPENDIX GN

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Manifest Requirements: (HWIMS 110)	OK	DF	NI	NA
1) Has the generator who transports, or offers for transport, hazardous waste for off-site treatment, storage, disposal, or recovery, completed the manifest adopted by the board? 329 IAC 3.1-7-3	✓			
2) Does the operator have copies of the manifest available for review? 40 CFR 262.40 (329 IAC 3.1-7-6)	✓			
3) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.	✓			
4) Do the manifest forms examined contain the following information? 40 CFR 262.21 (329 IAC 3.1-7-8)				
a. Manifest document number? EPA ID No. + Unique 5 digit No.? (five digit unique number)	✓			
b. Name, mailing address, telephone number, and EPA ID number of generator?	✓			
c. Name, telephone number (3.1-7-11) and EPA ID Number of Transporter(s)?	✓			
d. Name, Address, telephone number (3.1-7-11) and EPA ID Number of designated permitted facility?	✓			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
f. The total quantity of waste(s) and the type and number of containers loaded?	✓			
g. Required waste minimization certification?	✓			
h. Required signatures?	✓			
i. EPA hazardous waste numbers (3.1-7-11)?	✓			
j Handling Codes (3.1-7-11)?	✓			
k. Additional waste numbers included in box J.	✓			

		OK	DF	NI	NA
5)	For hazardous waste shipments to Indiana facilities (or hazardous waste shipments to states that do not supply manifests) has the generator used the Indiana Hazardous Waste Manifest? 329 IAC 3.1-7-4	✓			
6)	Has the generator submitted copies of hazardous waste manifests to the Department within five (5) working days after shipping hazardous waste? (This requirement applies to both Indiana's and other states hazardous waste manifests). 329 IAC 3.1-7-6	✓			

7) Reportable exceptions: 40 CFR 262.42 (HWIMS 180)

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. Ø

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Commissioner. Ø

EPA IDENTIFICATION NUMBERS

		OK	DF	NI	NA
1)	Has the generator received an EPA identification number prior to treating, storing, disposing of, transporting, or offering for transportation, hazardous waste? 40 CFR 262.12(a)	✓			
2)	Has the generator offered his hazardous waste to transporters or to TSD facilities that have received an EPA identification number? 40 CFR 262.12(c)	✓			

INTERNATIONAL SHIPMENTS: (HWIMS 190)

		OK	DF	NI	NA
1)	Has the installation imported or exported hazardous waste? 40 CFR 262.50 (If answered Yes, complete the following as applicable.)				✓
a.	Exporting hazardous waste; has a generator:				
i.	Notified the administrator and OSHWM/IDEM in writing?				✓

ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				✓
iii. Met the Manifest requirements?				✓
b. Importing hazardous waste; has the generator met the manifest requirements?				✓

LAND BAN NOTIFICATION REQUIREMENTS (HWIMS 700)	OK	DF	NI	NA
1) Does the operator have copies of LDR notifications available for review: 40 CFR 268.7	✓			
2) Does the operator provide a notification to the TSD facility with each shipment, even if waste meets treatment standards? 40 CFR 268.7	✓			
3) Does the notification include the following: (if possible, make copies of, or record information from notification(s) that do not contain the necessary information) 40 CFR 268.7	✓			
a. EPA hazardous waste number	✓			
b. Treatment standards (for wastes other than F001-F005 and F039, treatment standards may be referenced by including sub-category, treatability group, and CFR sections and paragraph where treatment standards appear)	✓			
c. Where treatment standards is specified technology, applicable five-letter treatment code?	✓			
d. Manifest number	✓			
e. If the waste meets treatment standards, or if alternate treatment standards for lab packs are specified, does it have proper certification statement?	✓			
f. Waste analysis data, if available.	✓			
4) Has the generator retained on-site a copy of all notices, certifications, and other documentation produced pursuant to 268.7 for at least five (5) years? 268.7(a)(7)	✓			

RECORDKEEPING AND REPORTING

1) Has the generator made a proper hazardous waste determination for all solid wastes generated at the facility, including correct LDR treatability group and treatment standard?
40 CFR 262.11 and 40 CFR 268.2 (HWIMS 100) ✓ ___ ___ ___

a. If DF, list below:

Assigned Classification	Correct Classification

b. Which of the following methods does the generator employ for waste determination?

a) Knowledge of waste.
b) Analysis. Specify _____

2) Are all test results and analyses needed for hazardous waste determinations retained for at least three years?
40 CFR 262.40 (HWIMS 180)

OK	DF	NI	NA
✓	___	___	___

3) Has the generator submitted biennial reports as required? 329 IAC 3.1-7-14) (HWIMS 180) ✓ ___ ___ ___

WASTE MINIMIZATION (HWIMS 100)

1) Does the generator have a written waste minimization plan? ✓ ___ ___ ___

a. If a written plan is not available, briefly describe the waste minimization program as presented by the company representative.

2) Does the biennial report include the required waste minimization information? (40 CFR 265.7(h) and (J)/IC 13-7-27-7) 329IAC 3.1-7-14(a)(1) — ✓ — —

see DOV #4

3) Note any discrepancies between the written or oral plan, and observed on-site waste minimization activities.

Although the facility could not find a copy of the biennial report during the inspection, the inspector reviewed the submitted biennial at IDEM and did not find the above waste minimization info. included with the report.

DRAW A SITE MAP; identify site of all hazardous waste activity, i.e. accumulation areas, storage areas, treatment areas, etc.

See Attached diagram.

Remember to take photos and document as well as possible all violations!!!

5015S

Revised 8/25/92

Use and Management of Containers

Location of Unit Drum Storage (by warehouse)

(HWIMS 160/410)
40 CFR Part 265 as referenced by 262.34

	OK	DF	NI	NA
1) Are containers in good condition? (265.171)	✓			
2) Are containers compatible with waste in them? (265.172)	✓			
3) Are containers managed to prevent leaks? (265.173(b)	✓			
4) Are containers stored closed? (265.173(d))	✓			
5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). (265.176)	✓			
6) Are incompatable wastes stored in separate containers? (If not the provisions of 265.17(b) apply) (265.177(a))	✓			
7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? (265.177(c))	✓			
8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? (265.17(a))				
a. Special handling?	✓			
b. No Smoking signs?	✓			
c. Separation and protection from ignition sources?	✓			
9) Does the container storage area have adequate aisle space		✓ see NOV#2		
10) Are containers inspected weekly for leaks, deterioration, corrosion, or other factors? (265.174)	✓			

Preparedness and Prevention

11) Security - Do security measures include: (HWIMS 300) (265.14)				
a. 24- hour surveillance? or	✓			
b. Barrier around facility including controlled entry?	✓			
c. Danger sign(s) at entrance?	✓			
12) Maintenace and Operation of Facility: (HWIMS 140/340, 810 spill)				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? (265.31)	✓			

13) If required, does the facility have the following equipment:
(HWIMS 140/340)

	OK	DF	NI	NA
a. Internal communications or alarm systems? (265.32(a) & 265.34(a))	✓			
b. Telephone or 2-way radios at the scene of operations? (265.32(b) & 265.34(b)	✓			
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic spinklers or water spray equipment available? (Please specify) (265.32(c))	✓			

14) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? (265.34(a)) (HWIMS 140/340) ✓

Testing and Maintenance of Emergency Equipment

(HWIMS 140/340)

15) a. Has the owner or operator established testing and maintenace procedures for emergency equipment? (265.33)	✓			
b. Is emergency equipment in operable condition? (265.33)	✓			

16) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas) (265.35) ✓ see comment below

two groups of drums did not have adequate aisle space for inspection purposes, but did have enough room for personnel, fire equipment, spill control equipment, ect...

*TSD's Only check for comments on back!

5017S

Revised 8/19/92

Generator Accumulation Appendix
(HWIMS 120)

Location of Unit Drum Storage

	OK	DF	NI	NA
1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations? 40 CFR 262.30-262.32	✓			
2) Is the container clearly marked with the start of accumulation date? 40 CFR 262.34	✓			
3) Have more than 90 days elapsed since the date inspected in (2)? 40 CFR 262.34				✓
4) Do wastes remain in accumulation tanks for more than 90 days? 40 CFR 262.34				✓
5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"? 40 CFR 262.34	✓			

Satellite Accumulation
(HWIMS 120)

	OK	DF	NI	NA
1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents? 40 CFR 262.34				
2) Are containers in good condition, compatible with the wastes in them and stored closed? 40 CFR 262.34				

Generator Accumulation Appendix
(HWIMS 120)

Location of Unit Tank Solid Filtation - SAA
Additive Blending Building

	OK	DF	NI	NA
1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations? 40 CFR 262.30-262.32				
2) Is the container clearly marked with the start of accumulation date? 40 CFR 262.34				
3) Have more than 90 days elapsed since the date inspected in (2)? 40 CFR 262.34				
4) Do wastes remain in accumulation tanks for more than 90 days? 40 CFR 262.34				
5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"? 40 CFR 262.34				

Satellite Accumulation
(HWIMS 120)

	OK	DF	NI	NA
1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents? 40 CFR 262.34		✓ See DOV #3		
2) Are containers in good condition, compatible with the wastes in them and stored closed? 40 CFR 262.34	✓			

0022S

Generator Accumulation Appendix
(HWIMS 120)

Location of Unit Filtration Process - SWA
Northeast Corner

	OK	DF	NI	NA
1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations? 40 CFR 262.30-262.32				
2) Is the container clearly marked with the start of accumulation date? 40 CFR 262.34				
3) Have more than 90 days elapsed since the date inspected in (2)? 40 CFR 262.34				
4) Do wastes remain in accumulation tanks for more than 90 days? 40 CFR 262.34				
5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"? 40 CFR 262.34				

Satellite Accumulation
(HWIMS 120)

1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents? 40 CFR 262.34	✓			
2) Are containers in good condition, compatible with the wastes in them and stored closed? 40 CFR 262.34	✓			

TANK SYSTEMS
40 CFR 265.190 through
40 CFR 265.200 and 329 IAC 3.1-9-3
(HWIMS 170/420)

I. Tank System(s) I.D.	Date of Installation
All Regulated hazardous Waste Tanks have been removed (See Comments page #2)	Not Applicable

	YES	NO
II. Integrity Assessment and Leak Test.		
A. Does the above referenced tank system require an integrity assessment?		
1. Existing interim status and permitted underground tank(1/12/88)		✓
2. All remaining existing tanks (12/20/89)		✓
3. New tank systems(6/20/88)		✓
B. Does the above referenced tank system require a leak test?		✓

	YES	NO
III. Secondary Containment		
A. Is secondary containment required?		
1. Existing interim status and permitted underground tank that cannot be entered (1/12/88).		✓
2. Existing tanks that is used to treat or store listed hazardous codes F020, F021, F022, F023, F026, or F027 (6/20/90)		✓
3. Existing interim status and permitted underground tank that cannot be entered and the age is known(1/12/89 or when the tank is 15 years old which ever is later)		✓
4. Existing tank whose age is known (6/20/92 or when the tank is 15 years old whichever is later)		✓

Tank System(s)(cont'd)

5. Existing interim status and permitted underground tank that cannot be entered whose age is unknown and the facility is greater than 7 years old by 1/12/87(6/20/90 or when the facility is 15 years old whichever is later)	____	✓
6. Existing tank whose facility is greater than 7 years old by 6/19/88 and age of the tank is unknown(6/20/90 or when the the facility is 15 years old which ever is later)	____	✓
7. Existing interim status or permitted underground tank that cannot be entered whose age is unknown and the facility is less than 7 years old by 1/12/87(1/12/95)	____	✓
8. Existing tank whose age is unknown and the facility's age is less than 7 years old by 6/19/88(6/20/96)	____	✓
9. New tank systems(6/20/88)	____	✓
B. Is secondary containment present?	____	✓

Comments: All of the hazardous waste tanks have been removed as part of closure of the TSD activities. Closure is not completed ("Certified Closed").

Tank System(s)(cont'd)

IV. General Operating Requirements(40 CFR 265.194)

	YES	NO	NI	NA
1. Are spill prevention controls(e.g. check valves, dry disconnect couplings) in use?				✓
2. Are overfill prevention controls (e.g.level sensing devices,high level alarms) present and operational?				✓
3. Is sufficient freeboard maintained in uncovered tanks to prevent overtopping due to wave or wind action or by precipitation?				✓
4. Has the owner/operator complied with the requirements of 40 CFR 265.196(Response to leaks or spills and disposition of leaking or unfit-for-use tank systems) if a leak or spill has occurred in the tank system?				✓

V. Inspections(40 CFR 265.195)

1. Does the owner/operator inspect, where present overfill/spill control equipment,(e.g. waste feed cutoff system, bypass systems, and drainage systems) to ensure that it is in good working order, at least once each operating day.				✓
2. Does the owner/operator inspect the above ground portions of the tank system to detect corrosion or release of waste once each operating day?				✓
3. Does the owner/operator inspect data gathered from monitoring equipment and leak-detection equipment(e.g. pressure and temperature guages, monitoring wells) to ensure that the tank system is being operated according to its design once each operating day?				✓

Tank System(s) (cont'd)

	YES	NO	NI	NA
4. Does the owner/operator inspect the construction materials and the area immediately surrounding the accessible portion of the tank system including secondary containment structures to detect erosion or signs of releases once each operating day?	___	___	___	✓
5. Is there a cathodic protection system present?	___	___	___	✓

a. Date cathodic protection was install_____

b. Date of first cathodic protection inspection_____

c. Method used to inspect cathodic protection_____

_____

d. Date of last cathodic protection inspection_____

	YES	NO	NI	NA
e. Has the owner/operator confirmed the proper operation of the cathodic protection system within six(6) months of initial installation?	___	___	___	✓
f. Does the owner/operator inspect the cathodic protection system annually after installation?	___	___	___	✓
g. Does the owner/operator inspect all sources of impressed current at least bi-monthly(every other month)?	___	___	___	✓
6. Does the owner/operator document the above mentioned inspections?	___	___	___	✓

VI. Response to Spills and Leaks(40 CFR 265.196)

1. In the event of a spill or leak did the owner/operator immediately remove the tank system from service and inspect the system for the cause of the release?	___	___	___	✓
2. Was the waste removed from the leaking tank system and the secondary containment within 24 hours of being detected or at the earliest practicable time?	___	___	___	✓

Tank System(s)(cont'd)

	YES	NO	NI	NA
3. Were visible releases to the enviment contained and immediately removed?				✓
4. In the event of a release to the enviroment, did the owner/operator report the incident to the Commissioner within 24 hours?				✓
5. did the owner/operator submit a written report to the Commissioner within 30 days of a release to the enviroment with the required information?				✓
6. In the event of a release, has the tank system or secondary containment system been repaired or closed as required?				✓
7. Were any extensive repairs to the tank system or secondary containment certified by an independent, qualified registered engineer?				✓

VII. Requirements for Ignitable, Reactive, or Incompatible Wastes (40 CFR 265.198 and 40 CFR 265.199)

1. Has the waste been treated, mixed or otherwise rendered nonreactive or not ignitable?				✓
-or-				
Is the tank protected from conditions that may cause it to ignite (use of spark proof tools) or protected from contact with materials that may cause it to react?				✓
2. Is the required National Fire Protection Association distance between waste tanks(ignitable waste) and public ways and adjoining properties maintained?				✓
3. Has an appropriate method of tank system decontamination been selected for tanks which previously held incompatible waste?				✓

TANK SYSTEM(S)(CONT'D)

VIII. Preparedness and Prevention

	YES	NO	NI	NO
1. Do security measures include: (40 CFR 265.14)(HWIMS 300)				
a. 24 hour surveillance? or			✓	
b. Barrier around facility including entry? or			✓	
c. Danger sign(s) at entrance?			✓	
2. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?(40 CFR 265.31)(HWIMS 140/340)			✓	
3. If required, does the facility have the following equipment: (40 CFR 265.32)				
a. Internal communications or alarm system?			✓	
b. Telephone or two-way radios at the scene of operations?			✓	
c. Portable fire extinguishers, fire control, spill control equipment, and decontamination?			✓	
d. Are water hoses, foam equipment, automatic sprinklers or water spray equipment available?			✓	
4. Whenever waste is being handled, do all personnel have immediate access to an alarm or communication device (through another employee if always available)?(40 CFR 265.34)			✓	
5. a. Has the owner or operator established testing and maintenance procedures for emergency equipment?			✓	
b. Is the emergency equipment in operable condition? (40 CFR 265.33)			✓	

Tank System(s)(cont'd)

6. Does the owner or operator maintain adequate aisle space for movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? ____ ____ ✓ ____

Comments _____

_____

_____

_____

_____

_____

WASTE PILES

40 CFR 265, Subpart L
329 IAC 3.1-10-1
(HWIMS 440)

	OK	DF	NI	NA
1) Is wind dispersal of hazardous waste managed? 40 CFR 265.251				✓
2) Is the pile protected from precipitation and run-on by some means (such as being under roof)? 40 CFR 265.253(b) (IF NOT then go to number 4)				✓
3) Are liquids or wastes containing liquids placed in the pile? 40 CFR 265.253(b)				✓
4) Does the facility maintain a proper run-on control system? 40 CFR 265.253(a)2				✓
5) Does the facility maintain a proper run-off system? 40 CFR 265.253(a)3				✓
6) Are run-off and run-on collection and holding facilities managed or emptied expeditiously after storms? 40 CFR 265.253(a)4				✓
7) If required, are reactive or flammable wastes handled properly? Is 265.17(b) complied with? 40 CFR 265.256 & 257				✓

Please describe the location of the pile including data pertinent to regulatory status (ie. inside, outside)

See attached description from ATEC
ATEC / ACS is going through clean closure of the waste pile
and has submitted Certification, but IDEM has not accepted closure yet

Please describe run-on and run-off control activities.

	OK	DF	NI	NA
1) Security - Do security measures include: (If applicable) (HWIMS 300)				
40 CFR 265.14				
a. 24-hour surveillance?	✓			✓
or				
b. i. Artificial or natural barrier around facility?	✓			
and				
ii. Controlled entry?	✓			
c. Danger sign(s) at entrance?	✓			

Preparedness and Prevention:

Part 265 Subpart C

2) Maintenace and Operation of Facility (HWIMS 340, 810 spill)				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 40 CFR 265.31				✓
3) If required, does the facility have the following equipment: (HWIMS 340)				
a. Internal communications or alarm systems? 40 CFR 265.32(a)	✓			
b. Telephone or 2-way radios at the scene of operations? 40 CFR 265.32(b)	✓			
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic spinklers or water spray equipment available? (Please specify) 40 CFR 265.32(c)	✓			

	OK	DF	NI	NA
4) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? 40 CFR 265.34(a) (HWIMS 340)	✓			
5) Testing and Maintenace of Emergency Equipment:				
a. Has the owner or operator established testing and maintenace procedures for emergency equipment? 40 CFR 265.33 (HWIMS 340)	✓			
b. Is emergency equipment maintained in operable condition? 40 CFR 265.33 (HWIMS 340)	✓			
6) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas) 40 CFR 265.35 (HWIMS 340)	✓			

CLOSURE CERTIFICATION REPORT

FORMER SOLIDS MIXING AREA UNIT
American Chemical Service, Inc.
Griffith, Indiana
ATEC Project No. 52-07-91-17175

1.0 INTRODUCTION

ATEC Associates, Inc. (ATEC) has completed the following closure certification report for the Former Solids Mixing Area Unit located at American Chemical Service, Inc. (ACS), in Griffith, Indiana. The purpose of the foregoing certification statement is to provide the written certification of the owner/operator and an independent registered P.E. that closure has been completed in accordance with the approved plan, Agreed Order between ACS and the Indiana Department of Environmental Management (IDEM), and certain specific procedures approved by IDEM during the course of closure. The following report is intended to describe the closure procedures, test results and findings in technical support of the certification.

The Former Solids Mixing Area Unit (the Unit) is best described as a small concrete pad (approximately 51 feet by 40 feet in size) with concrete walls approximately three feet high on three sides. The unit was inactive since 1983, prior to which ignitable hazardous waste (D001) was rendered non-ignitable by mixing with sand. Closure of the Unit was initiated in August of 1990, upon which time the concrete structure was dismantled, characterized and disposed of at an appropriately permitted facility. Following this, certain subsoils were also removed and clearance samples taken in accordance with the approved plan. Subsoil removal and clearance sampling was conducted in several steps, as were background soil samples used to develop site

Indiana Department of Environmental Management

VERIFICATION OF INSPECTION

This is to verify that on Dec 2, 1992 an inspection of American Chemical Service, Inc was conducted by the undersigned representatives of the Indiana Department of Environmental Management, Office of Solid and Hazardous Waste Management. The inspection was conducted to determine compliance with the Resource Conservation and Recovery Act (RCRA), IC 13-7, and rules promulgated pursuant to those statutes.

A summary of violations and concerns noted during the inspection were verbally communicated to the undersigned company representatives during the inspection. The company is encouraged to correct deficiencies as soon as possible. Corrections made and verified during the inspection may still be cited as violations; however, prompt action will be taken into consideration in determining the resolution to any enforcement action which may be taken.

Your company will be sent a preliminary summary of the violations identified as a result of the inspection within thirty (30) days of the inspection. The summary may identify violations not noted during the inspection if they surfaced as a result of a more extensive analysis of the rules or further review of records in the possession of the Department. The company is encouraged to contact the inspector to clarify any misunderstandings which you believe may be reflected in the inspection summary.

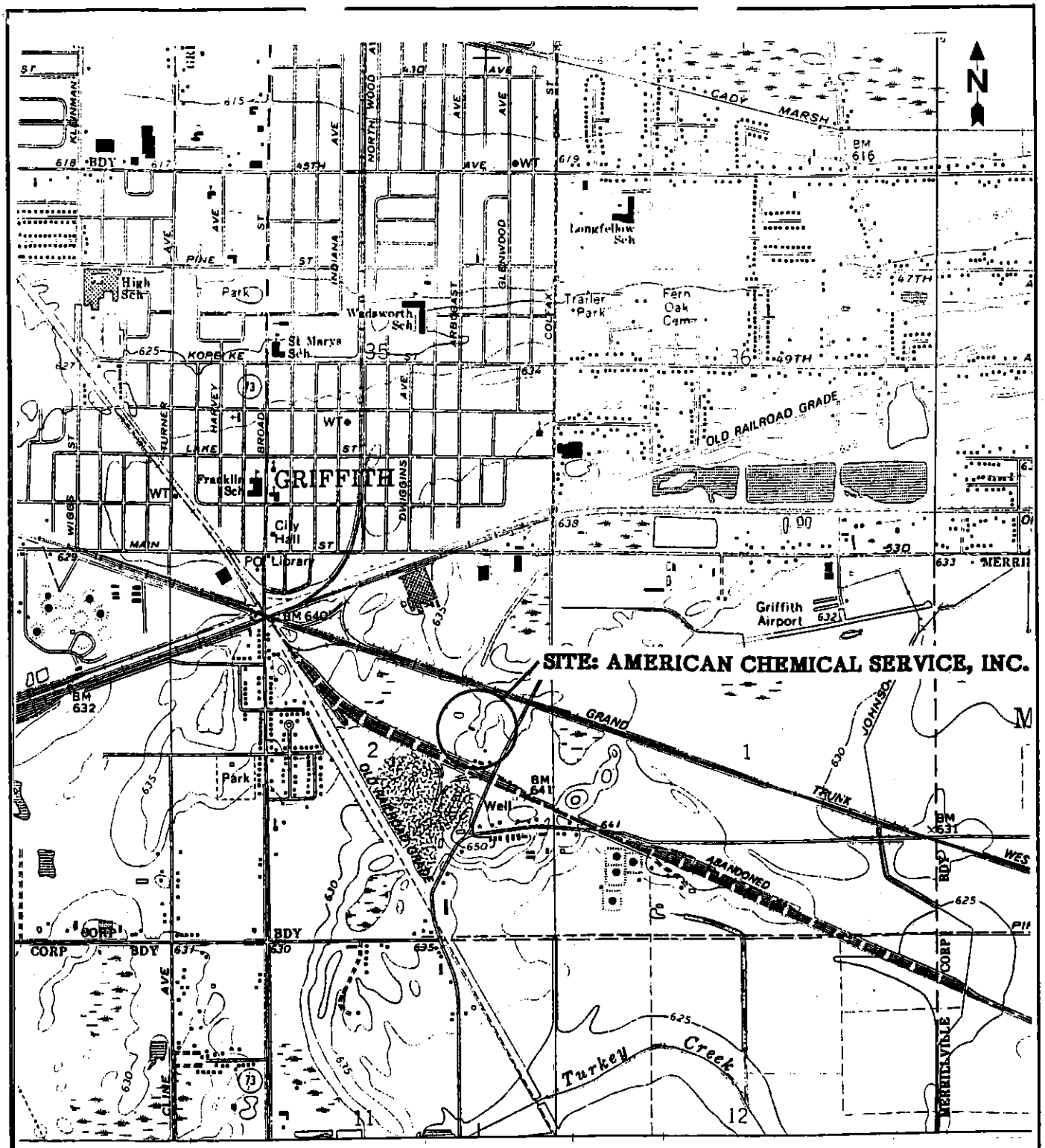
IDEM: Printed Name	Signature	Position	Phone #	Date
Rick Roudebush	Rick Roudebush	Env. mgr II	317/233-4057	12/2/92
MARC HERDRICH	Marc Herdrich	"	"	"

Company: Printed Name	Signature	Position	Phone #	Date
JAMES MURPHY AMERICAN CHEMICAL SERVICE	James Murphy	PLANT MANAGER	219/884-8370	12/2/92

Company Mailing Address
AMERICAN CHEMICAL SERVICE
PO BOX 190
GRIFFITH, IN 46319

specific cleanup criteria. Care was taken in the execution of this project to obtain representative background soil samples and in the calculation of appropriate cleanup criteria. Analytical test results indicate that all concrete and all soils exceeding site specific cleanup criteria have been removed and have been properly disposed of. Following IDEM's acknowledgement of clean closure, ACS will immediately complete the backfilling of the shallow excavation, thus completing the closure process.

The following report is organized to address the informational requirements for closure certification reports as listed in Section 18 of the following IDEM guidance: "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities", Indiana Department of Environmental Management, Office of Solid and Hazardous Waste Management, 1988.



SCALE 1:24000

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

SCALE: 1" = 2,000'

SOURCE: MODIFIED FROM USGS, 1986

AMERICAN CHEMICAL SERVICE
GRIFFITH, INDIANA

FIGURE 1

SITE LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

AMCH-LOC.DWG – 02/11/92 – KHN

DESCRIPTION OF VIOLATIONS
American Chemical Service, Inc.
IND 016 360 265
INSPECTION OF December 2, 1992

1. Page #6 40 CFR 268.50
American Chemical Service, Inc had 39 drums of F001/F002/F003/F005 closure clean up debris stored on-site for greater than one year. Storage dates on the drums started in 1989.

2. Page #22 40 CFR 262.34
The facility did not have adequate aisle space for two groups of (approximately 12-13 drums each) hazardous waste containers in the drum storage area by the warehouse.

3. Page #25 40 CFR 262.34
The additive blending building satellite accumulation container (storing solids from railroad tank bottoms) was not marked with the words "hazardous waste" or other words identifying the contents.

4. Page #20 329 IAC 3.1-7-14(a)(1)
Although the facility could not find a copy of the 1991 biennial report during the inspection, the inspector reviewed the biennial report submitted to IDEM and did not find the waste minimization statement, required in the report.

RRR 12/14/92

PREINSPECTION FILES AUDIT
CHECKLIST

DATE: 11 / 30 / 92

BY: RD

COMPANY: American Chemical Service

LOCATION: Griffith, In

I.D.#: IND/016/360/265

Type of inspection: G---T---TSD---Closure---Complaint---Other (please specify)

A. GENERAL

		YES	NO	NA
1.	FEDERAL NOTIFICATION ON FILE?	✓ 1/80 & 1986		
2.	FEDERAL PART A ON FILE?	✓ 2/82	updated 1985	
3.	CLOSURE PLAN REVIEWED?	✓		
4.	CONTINGENCY PLAN REVIEWED?			
5.	BIENNIAL REPORT REVIEWED?	✓ 1989		
*6.	PART B PERMIT REVIEWED?			

*(Note any Special Permit Conditions)

Comments: Contact Walter Wagoner Jr. (? - 1990)
facility stopped accepting HzW 9/90 submitted closure on 10/92 - Tank (storage) emptied during 1991.
Contacts on 1/24/92 mgr. James Tarpo, pres, James Murphy, Plant m

B. NOTIFICATION DATA (Notify type, waste codes listed, etc.)

F - Solvents

C. LAND DISPOSAL INFORMATION

1. List Waste and Land Disposal Facility

D. LIST POSSIBLE WASTE STREAMS NOT LISTED ON BIENNIAL REPORT

ACS had 1 - undetermined Waste Stream from filtration process (identified by PRC 1/24/92

E. LIST WASTE MANAGEMENT PRACTICES WHICH MAY REQUIRE A PERMIT

NA

F. FEDERAL PART A (Handling Codes), OR PART B PERMIT

	Code	Amount	Unit of Measure
1.	f solvent	recovery	
2.			
3.			
4.			
5.			

Are there any discrepancies regarding multiple Part A submittals?

G. CLOSURE/POST-CLOSURE

1. Are there any closed units? If yes, describe.

Closure of solvent recovery (Tank storage) (distillation units) approved 10/2/90 revised 12/6/91 & 8/92

H. COMPLIANCE HISTORY

List past two inspections and enforcement actions (CO, NOV, VL, WL)

Date of Inspection	Action Type	Date of Action
1/24/92	VL 11096	4/27/92 (LOC 9/10/92)
3/8/91	None	- LOC 6/14/91

I. LIST UNRESOLVED ENFORCEMENT ACTIONS/VIOLATIONS

Ø

J. BRIEFLY SUMMARIZE PREVIOUS VIOLATIONS. NOTE IF THEY ARE REPEATS.

1/24/92 insp - aisle space container storage
personel tr. /

K. LIST ANY ITEMS UNDER COMPLIANCE SCHEDULES WHICH ARE NOT YET COMPLETED OR NEED FIELD VERIFIED, INCLUDING WASTE MINIMIZATION REQUIREMENTS IN ENFORCEMENT ORDER AND SETTLEMENT AGREEMENTS.

Ø

L. COMMENTS

Waste Streams - D001, D035, 0039, D040 from filtration process
of fuel additives & plasticizers (~10-55 gal drums/3mos.

2455v

Revised 8/19/92

G 4-6-92

RECEIVED

APR 3 1992

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

TSD - RCRA INSPECTION REPORT

EPA ID # IND 016 360 265 NAME American Chemical Service, Inc.

MAILING ADDRESS: P.O. Box 190
Griffith, Indiana 46319

LOCATION ADDRESS: 420 S. Colfax Avenue
Griffith, Indiana 46319

CONTACT: James Tarpo PHONE: 219/924-4370

OWNERSHIP: American Chemical Service, Inc. COUNTY: Lake

STATUS CODE: 1
1 = Active 2 = Obsolete 3 = Dead Mail
4 = PCB Handler 5 = Out of business 6 = Non-handler
9 = Superfund site

ACTIVITY: (This should reflect the actual functioning of the facility)

LQG ___ SQG X CEG ___ Transporter ___ TSD X UI ___

Transporters: Air ___ Rail ___ Hwy ___ Water ___ Other ___

Hazardous Waste Fuel : Gen mktg burner ___ other mktr ___ burner ___

Off Spec Used Oil Fuel : Gen mktg burner ___ other mktr ___ burner ___

Spec Used Oil Fuel Mktr : ___

Burning Device : Util boiler ___ Indus boiler ___ Indus furn ___

Person(s) Interviewed:	Title:	Telephone:
James Tarpo	General Manager	219/924-4370
James Murphy	Plant Manager	219/924-4370

Inspector(s)	Agency:	Telephone:
Jack Brunner	PRC for IDEM; Lead Inspector	312/856-8700
Lorraine Morris	PRC for IDEM; Inspector	312/856-8700

Date of Inspection: 1/24/92 Time of Inspection: 9:15 am - 2:15 pm

Installation Processes by Process Code (EPA Form 3510-3)

S01	X	Container storage	T03	___	Incinerator treatment
S02	X	Tank storage	T04	X	Other treatment
S03	___	Waste pile storage	D79	___	Injection well disposal
S04	___	Surface impoundment storage	D80	___	Landfill disposal
T01	___	Tank treatment	D81	___	Land application disposal
T02	___	Surface impoundment treatment	D83	___	Surface impoundment disposal

If Part A process codes are listed above as T04, please describe the process involved below:

Solvent reclamation

(1) Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application (HWIMS 610)

(2) Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

(3) Type of Operation, Products Manufactured, Processes Utilized, Size of Operation, Concentrate on processes that produce waste (hazardous or nonhazardous):

ACS manufactures plasticizers and fuel additives. Hazardous wastes are currently generated from filtering products and product intermediates. The facility has discontinued its TSD operations.

(4) If any of the wastes are managed in the manners listed below, please check those areas and utilize the provided appendices.

		YES	NO
(A) Waste Oil Fuel	- Appendix A	___	X
(B) Lead Acid Batteries	- Appendix B	___	X
(C) Hazardous Waste Fuel	- Appendix C	___	X
(D) Precious Metals	- Appendix D	___	X
(E) Use Constituting Disposal	- Appendix E	___	X
(F) Tanks		X	___
(G) Use and Management of Containers		X	___
(H) Generator Accumulation Appendix		X	___
(I) Waste Pile		___	X
(J) Surface Impoundment		___	X
(K) Landfill		___	X

5)

Hazardous Waste Streams/EPA #	Source	Rate	Disposition
Filter solids/D001, D035, D039, D040	Filtration of products and product intermediates	10 drums/ 3 months	Marine Shale Processors, Inc.

(6) List all wastes not listed above.

Waste	Process Generating Waste	Rate	Disposition
Nonhazardous Filtercake	Filtration of products	10 drums every month	Not yet determined

(7) If the company claims a reuse or reclaim exemption, please include the following information:

	Waste Type	Generating Rate	How Reclaimed & by Whom	Quantity Stored On Site
A.				
B.				

(8)

Hazardous Waste On-Site	Amount	How Stored	Comments
F001, F002, F003, and F005	approximately 55,000 gallons	55-gal. drum	Contaminated rock, soil, and sand from closure activities

(9) Has the capacity of the storage areas listed on the Part A exceeded that allowed? List the type and amount of actual storage capacity overages. 329 IAC 3-38-2 (HWIMS 610)

No

(10) Indicate any TSD activities which have been omitted from or are not clear on the facility map (for the purpose of determining if expansion has occurred). (40 CFR 270.13 and 329 IAC 3-34-4)(HWIMS 610)

No TSD activity - except storage of contaminated rock, soil, and sand from closure activities

(11) Is the Biennial Report Accurate? (3-10-2) Yes

(12) Note any potential non-RCRA problems (open dumping, dumping in city sewer without pretreatment program, OSHA, etc.)

N/A

(13) Additional comments?

GENERAL FACILITY STANDARDS (paperwork)

	OK	DF	NI	NA
(1) Has the Regional Administrator/Environmental Management Board been notified regarding:				
(a) Receipt of hazardous waste from a foreign source? 40 CFR 265.12(a) (329 IAC 3-16-3) (HWIMS 300)	___	___	___	X
(b) Facility expansion? 40 CFR 270.72(b) (329 IAC 3-38-3) (HWIMS 610)	___	___	___	X
(c) Change of owner or operator? 40 CFR 265.12(b) (329 IAC 3-16-3) (HWIMS 300)	___	___	___	X

(2) General Waste Analysis: (HWIMS 310)

	OK	DF	NI	NA
(a) Has the owner or operator made a detailed chemical and physical analysis of the waste either through testing or knowledge of the process? 40 CFR 265.13(a)1(329 IAC 3-16-4)	X	___	___	___
(b) Does the owner or operator have a detailed waste analysis plan on file at the facility? 40 CFR 265.13(b) (329 IAC 3-16-4)	X	___	___	___
Does the waste analysis plan contain:				
1. parameters (and rationale for their choice)	X	___	___	___
2. test methods	X	___	___	___
3. sampling method for representative sample	X	___	___	___
4. frequency of analysis (and rationale)	X	___	___	___
5. off-site only: waste analysis from generators	X	___	___	___
6. Additional waste analysis needed (when a change in waste type or process occurs)				
a. 265.193 (329 IAC 3-24-11)Tanks (see above)	X	___	___	___
b. 265.225 (329 IAC 3-25-5) Impoundment (same as above)	___	___	___	X
c. 265.252 (329 IAC 3-26-3) Waste Pile (same as above)	___	___	___	X
d. 265.273 (329 IAC 3-27-3) Land Treatment (same as above)	___	___	___	X
e. 265.341 (329 IAC 3-29-2) Incinerators (same as above)	___	___	___	X
f. 265.375 (329 IAC 3-30-3) Thermal Treatment (same as above)	___	___	___	X
g. 265.402 (329 IAC 3-31-3) Other Treatment (same as above)	___	___	___	X

	OK	DF	NI	NA
(c) Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	X			

(d) Is the waste analysis plan followed? The facility no longer operates as a TSD facility.

(3) Owner or Operator Inspections: (HWIMS 320)

	OK	DF	NI	NA
(a) Does the owner or operator inspect the facility for deterioration, malfunctions, operator errors, and discharges of hazardous waste that may affect human health or the environment? 40 CFR 265.15(a) (329 IAC 3-16-6)(a)	X			
(b) Does the owner or operator have an inspection schedule at the facility? 40 CFR 265.15(b)2 (329 IAC 3-16-6)(b)1	X			
(c) If so, does the schedule address the inspection of the following items: 40 CFR 265.15(b)1 (329 IAC 3-16-6)				
1. monitoring equipment?	X			
2. safety and emergency equipment?	X			
3. security devices (including fences)?	X			
4. operating and structural equipment (i.e., dikes, pumps, etc.)?	X			
5. type of problems to be looked for during the inspection (e.g., leaky fittings, defective pump, etc.)? 40 CFR 265.15(b)(2) (329 IAC 3-16-6)(b)3	X			
6. inspection frequency (based upon the possible deterioration rate of the equipment)? (3-16-6)(b)4	X			

	OK	DF	NI	NA
7. Must include:				
a. Weekly container storage? (See 265.174) (329 IAC 3-23-5)	X			
b. Daily and weekly tank storage? (See 265.194) (329 IAC 3-24-6)	X			
c. Daily freeboard and weekly dike inspection for surface impoundments? (See 265.226) (329 IAC 3-25-6)				X
d. Landfills, thermal treatment, chemical, physical, and biological treatment should be inspected as determined by deterioration rate and daily at loading and unloading areas (where spills are likely) (See 265.15(b)(4)) (329 IAC 3-16-6)				X
(d) Does Owner or Operator follow the written inspection schedule as outlined? 265.16(b)(1) (329 IAC 3-16-6)	X			
(e) Are areas subject to spills inspected daily when in use? 265.15(b)(4) (329 IAC 3-16-6)	X			
(f) Does the owner or operator maintain an inspection log or summary of owner or operator inspections? 40 CFR 265.15(d) (329 IAC 3-16-6)(d)	X			
(g) Does the inspection log contain the following information: 40 CFR 265.15(d) (329 IAC 3-16-6)(d)				
1. the date and time of the inspection?	X			
2. the name of the inspector?	X			
3. a notation of the observations made?	X			
4. the date and nature of any repairs or remedial actions?	X			

	OK	DF	NI	NA
(4) Do personnel training records include: (HWIMS 330)				
(a) Job titles for the positions related to HWM 40 CFR 265.16(d)1 (329 IAC 3-16-7)(d)1	___	X	___	___
(b) The name of the employees filling each job title? 40 CFR 265.16(d)1 (329 IAC 3-16-7)(d)1	___	X	___	___
(c) Job descriptions, including the required skills, education, or other qualifications and the duties of the personnel assigned to the position? 40 CFR 265.16(d)2 (329 IAC 3-16-7)(d)2	___	X	___	___

Check categories for which job titles/descriptions are available (please include the supervisors of each category in that category when reviewing documents).

Emergency coordinator __ Training coordinator _ Emergency response personnel __
Inspectors ___ Material handlers ___ Container labelers ___ Manifesters __
Recordkeepers __

(d) Description of both introductory and continuing training required for each job? 40 CFR 265.16(d)(3) (329 IAC 3-16-7)(d)3	X	___	___	___

Describe in general the type of training program in use at the facility.

Classroom training includes lectures, slides, and written tests

(e) Records of training required in (d)? 40 CFR 265.16(d)4 (329 IAC 3-16-7)(d)	X	___	___	___
(f) Did facility personnel receive the required training including:				
1. classroom or on the job	X	___	___	___
2. within 6 months of hire	X	___	___	___
3. annual review of training? (3-16-7)(c)	X	___	___	___
(g) Are all training records maintained for current personnel and for at least three years for former employees? 40 CFR 265.16(e) (329 IAC 3-16-7(e))	X	___	___	___

CONTINGENCY PLAN AND EMERGENCY PROCEDURES (HWIMS 350)

	OK	DF	NI	NA
(1) Does the Contingency Plan contain the following information:				
(a) The actions facility personnel must take to comply with 265.51 (3-18-2) and 265.56 (3-18-7) in response to fires, explosions, or any unplanned release of hazardous waste? [If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable)]. 329 IAC 3-18-3(a) and (b)	X			
(b) A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services. (329 IAC 3-18-3)(c)	X			
1. Names, addresses, and phone numbers of all persons qualified to act as emergency coordinators? (329 IAC 3-18-3)(d)	X			
2. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? 40 CFR 265.52(e) (329 IAC 3-18-3)(e)	X			
3. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.) 40 CFR 265.52(f) (329 IAC 3-18-3)(f)	X			
(2) Emergency Coordinator:				
(a) Is the facility Emergency Coordinator identified? 40 CFR 265.52(d) (329 IAC 3-18-3)(d)	X			
(b) Is coordinator familiar with all aspects of site operation and emergency procedures? 40 CFR 265.55 (329 IAC 3-18-6)	X			
(c) Does Emergency Coordinator have the authority to carry out the Contingency Plan? 40 CFR 265.55 (329 IAC-3-18-6)	X			

PREPAREDNESS AND PREVENTION

	OK	DF	NI	NA
(1) Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility? 40 CFR 265.37(329 IAC 3-17-7)(a) (HWIMS 340)	X			
(2) Are copies of the Contingency Plan available at the site and local emergency organizations? 40 CFR 265.53(329 IAC 3-18-4) (HWIMS 350)	X			
(3) Emergency Procedures If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56 (329 IAC 3-18-7)? (HWIMS 350)	X			

Emergency procedures were followed during an on-site fire in October 1991.

MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING

	OK	DF	NI	NA
(1) Use of Manifest System: (HWIMS 360)				
(a) Does the facility follow the procedures listed in 265.71 (3-19-2) for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.) (329 IAC 3-19-2)(a)5				X
(b) Are records of past shipments retained for three (3) years? 40 CFR 265.71(b)5 (329 IAC 3-19-2)(a)6				X
2) Has the facility submitted copies of hazardous waste manifests to the Department within five (5) working days after receiving waste? (This requirements applies to both Indiana's and other states hazardous waste manifests)? (329 IAC 3-19-2)(a)4				X
(3) Does the owner or operator meet requirements regarding manifest discrepancies? (Off-site facilities only) 40 CFR 265.72(329 IAC 3-19-3)				X
(4) Unmanifested Waste Reports: (applies only to off-site facilities)				
(a) Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 (3-8-1) without a manifest or shipping paper? 40 CFR 265.76 (329 IAC 3-19-7)				X
(b) If "a" is yes, provide the identity of the source of the waste and a description and the quantity, type and date received for each unmanifested hazardous waste shipment.				X

	OK	DF	NI	NA
(c) Has the facility submitted 8700-13B (unmanifested waste report)? (329 IAC 3-19-7)	___	___	___	X

ACS no longer receives hazardous waste from off site.

(5) Closure/Post Closure

	OK	DF	NI	NA
(a) Is the closure plan available for inspection? 40 CFR 265.112(a)(329 IAC 3-21-3)(a) (HWIMS 390)	X	___	___	___
(b) Is the post-closure plan available for inspection? (for disposal facilities only) 40 CFR 265.118(a)(329 IAC 3-21-9)(b) (HWIMS 390)	___	___	___	X
(c) Has the closure cost and post-closure cost estimate been revised annually to account for inflation. (329 IAC 3-22-3)(b) (HWIMS 400)	X	___	___	___

(6) Operating Record (HWIMS 370)

	OK	DF	NI	NA
(a) Does owner or operator have an operating record? 40 CFR 265.73(a) (329 IAC 3-19-4)(a)	X	___	___	___
(b) Does the owner or operator maintain an operating record that contains the following information?				
1. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR 265 Appendix I (329 IAC 3-32-2)? 40 CFR 265.73(b)(1) (329 IAC 3-19-4)(b)	___	___	___	X

Summarize how the facility tracks the method and date of TSD activity.

ACS no longer receives hazardous waste from off site.

2. The location and quantity of each hazardous waste within the facility? (This information shall be cross-referenced to a specific manifest number if the waste was accompanied by manifest.) 40 CFR 265.73(b)(2) (329 IAC 3-19-4)(b)2	___	___	___	X

Summarize how the facility tracks the location and quantity of waste.

	OK	DF	NI	NA
3. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if accompanied by a manifest.) 40 CFR 265.73(b)(2) (329 IAC 3-19-4)(b)2	___	___	___	X
4. Records and results of all waste analyses, trial tests, monitoring data, and operating inspections? 40 CFR 265.73(b)(3)(5)(6) (329 IAC 3-19-4)(b)3	___	___	___	X
5. Reports detailing all incidents that required implementation of the Contingency Plan? 40 CFR 265.73(b)(4) (329 IAC 3-19-4)(b)4	X	___	___	___
6. All closure and post closure costs as applicable? 40 CFR 265.73(b)(7) (329 IAC 3-19-4)(b)7	X	___	___	___

GROUND-WATER MONITORING
(40 CFR Subpart F)

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

(1) Has the owner or operator of the facility implemented a ground-water monitoring system? 40 CFR 265.90(a) (329 IAC 3-20-1)(a) (HWIMS 380)	___	___	___	X
(2) Has the owner or operator of the facility implemented an alternate ground-water monitoring system as described in 269.90(d) (329 IAC 3-20-1)(d)? (HWIMS 380)	___	___	___	X

APPENDIX GN

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Manifest Requirements: (HWIMS 110)	OK	DF	NI	NA
(1) Does the operator have copies of the manifest available for review? 40 CFR 262.40(329 IAC 3-10-1)(a)	X			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.		2		
(3) Do the manifest forms examined contain the following information. 40 CFR 262.21(329 IAC 3-8-1)				
(a) Manifest document number? EPA ID No. + Unique 5 digit No.? (A sequential number for all manifests before September 20, 1984, and a five-digit unique number after September 20, 1984.)	X			
(b) Name, mailing address, telephone number, and EPA ID number of generator? (329 IAC 3-14-4)	X			
(c) Name, address, telephone number (329 IAC 3-14-5), and EPA ID number of transporter(s)?	X			
(d) Name, address, telephone number (329 IAC 3-14-3), and EPA ID number of designated permitted facility?	X			
(e) The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	X			
(f) The total quantity of waste(s) and the type and number of containers loaded?	X			
(g) Required certification?	X			
(h) Required signatures?	X			
(i) EPA hazardous waste number (329 IAC 3-14-3)?	X			

	OK	DF	NI	NA
(4) For hazardous waste shipments to Indiana facilities (or hazardous waste shipments to states that do not supply manifests), has the generator used the Indiana Hazardous Waste Manifest? 329 IAC 3-8-2	___	___	___	X
(5) Has the generator submitted copies of hazardous waste manifests to the Department within five (5) working days after shipping hazardous waste? (This requirement applies to both Indiana's and other states hazardous waste manifests.) 329 IAC 3-8-4	___	X*	___	___

(6) Reportable exceptions:
40 CFR 262.42(329 IAC 3-10-3) (HWIMS 180)

(a) For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. None

(b) For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) (329 IAC 3-10-3) to the Regional Administrator.

*The facility uses manifests provided by the State of Louisiana; however, copies of these manifests are not submitted to IDEM.

INTERNATIONAL SHIPMENTS (HWIMS 190)

	OK	DF	NI	NA
(1) Has the installation imported or exported hazardous waste? 40 CFR 262.50(329 IAC 3-11-1) (If answered yes, complete the following as applicable.)	___	___	___	X
(a) Exporting hazardous waste; has a generator:				
1. Notified the administrator in writing?	___	___	___	X
2. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	___	___	___	X
3. Met the Manifest requirements?	___	___	___	X
(b) Importing hazardous waste; has the generator met the manifest requirements?	___	___	___	X

RECORDKEEPING AND REPORTING

	OK	DF	NI	NA
(1) Has the generator made a proper hazardous waste determination for all solid wastes generated at the facility? 40 CFR 262.11(329 IAC 3-7-2) (HWIMS 100)	X			
(2) Has the generator submitted biennial reports and exception reports as required? 329 IAC 3-10-2 and 329 IAC 3-10-3 (HWIMS 180/360)	X			
(3) Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 40 CFR 262.40(329 IAC 3-10-1)(c) (HWIMS 180)		X*		

*The facility did not maintain copies of waste analysis results for waste filter solids it considers to be nonhazardous.

DRAW A SITE MAP; identify site of all hazardous waste activity, i.e., accumulation areas, storage areas, treatment areas, etc.

See Figure 2 of the CEI report.

GENERATOR ACCUMULATION APPENDIX
(HWIMS 120)

Location of Unit Outdoor Drum Storage Area

	OK	DF	NI	NA
(1) If waste is being shipped off-site, is it properly packaged, labeled, and marked per DOT regulations? 40 CFR 262.30 - 262.32 (329 IAC 3-9-1 to 3)				X

No waste had been prepared for transportation at the time of the inspection.

(2) Is the container clearly marked with the start of accumulation date? 40 CFR 262.34(329 IAC 3-9-5)	X			
(3) Have more than 90 days elapsed since the date inspected in (a)? 40 CFR 262.34(329 IAC 3-9-5)	No			
(4) Do wastes remain in accumulation tanks for more than 90 days? 40 CFR 262.34(329 IAC 3-9-5)				X
(5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste?" 40 CFR 262.34(329 IAC 3-9-5)	X			

(3) Drums in outdoor storage area are stored for more than 90 days.

SATELLITE ACCUMULATION
(HWIMS 120)

(1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents? 40 CFR 262.34(329 IAC 3-9-5(c)(1)				
(2) Are containers in good condition, compatible with the wastes in them and stored closed? 40 CFR 262.34(329 IAC 3-23-2 & 3 & 4(a))				

GENERATOR ACCUMULATION APPENDIX
(HWIMS 120)

Location of Unit Container Accumulation Area No. 1

	OK	DF	NI	NA
(1) If waste is being shipped off-site, is it properly packaged, labeled, and marked per DOT regulations? 40 CFR 262.30 - 262.32 (329 IAC 3-9-1 to 3)				X

No waste was prepared for transportation at the time of the inspection.

(2) Is the container clearly marked with the start of accumulation date? 40 CFR 262.34(329 IAC 3-9-5)	X			
(3) Have more than 90 days elapsed since the date inspected in (a)? 40 CFR 262.34(329 IAC 3-9-5)	No			
(4) Do wastes remain in accumulation tanks for more than 90 days? 40 CFR 262.34(329 IAC 3-9-5)				X
(5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste?" 40 CFR 262.34(329 IAC 3-9-5)	X			

SATELLITE ACCUMULATION
(HWIMS 120)

(1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents? 40 CFR 262.34(329 IAC 3-9-5(c)(1)				
(2) Are containers in good condition, compatible with the wastes in them and stored closed? 40 CFR 262.34(329 IAC 3-23-2 & 3 & 4(a))				

GENERATOR ACCUMULATION APPENDIX
(HWIMS 120)

Location of Unit Container Accumulation Area No. 2

	OK	DF	NI	NA
(1) If waste is being shipped off-site, is it properly packaged, labeled, and marked per DOT regulations? 40 CFR 262.30 - 262.32 (329 IAC 3-9-1 to 3)				X

No waste was prepared for transportation at the time of the inspection.

(2) Is the container clearly marked with the start of accumulation date? 40 CFR 262.34(329 IAC 3-9-5)	X			
(3) Have more than 90 days elapsed since the date inspected in (a)? 40 CFR 262.34(329 IAC 3-9-5)	No			
(4) Do wastes remain in accumulation tanks for more than 90 days? 40 CFR 262.34(329 IAC 3-9-5)				X
(5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste?" 40 CFR 262.34(329 IAC 3-9-5)	X			

SATELLITE ACCUMULATION
(HWIMS 120)

(1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents? 40 CFR 262.34(329 IAC 3-9-5(c)(1)				
(2) Are containers in good condition, compatible with the wastes in them and stored closed? 40 CFR 262.34(329 IAC 3-23-2 & 3 & 4(a))				

USE AND MANAGEMENT OF CONTAINERS

Location of Unit Outdoor Drum Storage Area

		OK	DF	NI	NA
(1)	Are containers in good condition?	X			
(2)	Are containers compatible with waste in them?	X			
(3)	Are containers managed to prevent leaks?	X			
(4)	Are containers stored closed?	X			
(5)	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive).	X			
(6)	Are incompatible wastes stored in separate containers? (If not, the provisions of 265.17(b) apply)				X
(7)	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				X
(8)	If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
	(a) Special handling?				X
	(b) No Smoking signs?	X			
	(c) Separation and protection from ignition sources?	X			
(9)	Does the container storage area have adequate aisle space (about 2.5 feet)?		X		
(10)	Can containers be inspected for leaks or deterioration without moving the containers during the inspection?		X		

PREPAREDNESS AND PREVENTION

(11)	Security -- security measures include: (HWIMS 300)				
	(a) 24-hour surveillance? or				X
	(b) Barrier around facility including controlled entry?	X			
	(c) Danger sign(s) at entrance?	X			
(12)	Maintenance and Operation of Facility: (HWIMS 140/340, 810 spill)				
	(a) Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	X*			

		OK	DF	NI	NA
(13)	If required, does the facility have the following equipment: (HWIMS 140/340)				
	(a) Internal communications or alarm systems?	X			
	(b) Telephone or 2-way radios at the scene of operations?	X			
	(c) Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic sprinklers, or water spray equipment available? (Please specify)	X			
(14)	Whenever waste is being handled, do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? (HWIMS 140/340)	X			

TESTING AND MAINTENANCE OF EMERGENCY EQUIPMENT
(HWIMS 140/340)

(15)	(a) Has the owner or operator established testing and maintenance procedures for emergency equipment?	X			
	(b) Is emergency equipment in operable condition?	X			
(16)	Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas.)		X**		

* The facility was storing nine drums of resin that had been involved in an on-site fire in October 1991.

** The facility did not provide adequate aisle space for approximately 100 drums stored in the outdoor drum storage area.

USE AND MANAGEMENT OF CONTAINERS

		YES	NO
(1)	Are containers in good condition? 40 CFR 265.170 (329 IAC 3-23-1)	X	
(2)	Are containers compatible with waste? 40 CFR 265.172 (329 IAC 3-23-3)	X	
(3)	Are containers managed to prevent leaks? 40 CFR 265.173(b) (329 IAC 3-23-4)	X	
(4)	Are containers stored closed? 40 CFR 265.173(d) (329 IAC 3-23-4)	X	
(5)	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). 40 CFR 265.176 (329 IAC 3-23-6)	X	
(6)	Are incompatible wastes stored in separate containers? (If not, the provisions of 265.17(b) apply) 40 CFR 265.177(a) (329 IAC 3-23-7)		NA
(7)	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? 40 CFR 265.177(c) (329 IAC 3-23-7)		NA
(8)	If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?		
	(a) Special handling?		NA
	(b) No Smoking signs?	X	
	(c) Separation and protection from ignition sources? 40 CFR 265.17(a) (329 IAC 3-16-8)	X	
(9)	Does the container storage area have adequate aisle space (about 2.5 feet)? 329 IAC 3-23-4 (c)		X
(10)	Can containers be inspected for leaks or deterioration without moving the containers 329 IAC 3-23-4 (c)		X
(11)	*Security -- security measures include:		
	(a) 24-hour surveillance? or		NA
	(b) Barrier around facility including controlled entry?	X	
	(c) Danger sign(s) at entrance? 40 CFR 265.14 (329 IAC 3-16-5)	X	
(12)	Maintenance and Operation of Facility:		
	(a) Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 40 CFR 265.31 (329 IAC 3-17-2)	X	

[* TSD's only]

		YES	NO
(13)	If required, does the facility have the following equipment:		
	(a) Internal communications or alarm systems? 40 CFR 265.32(a) & 40 CFR 265.34(a) (329 IAC 3-17-3 & 5)	X	___
	(b) Telephone or 2-way radios at the scene of operations? 40 CFR 265.32(b) & 40 CFR 265.34(b) (329 IAC 3-17-3 & 5)	X	___
	(c) Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic sprinklers, or water spray equipment available? 40 CFR 265.32(c) (329 IAC 3-17-3 (c)	X	___
(14)	Whenever waste is being handled, do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? 40 CFR 265.34(a) (329 IAC 3-17-5)	X	___
(15)	(a) Has the owner or operator established testing and maintenance procedures for emergency equipment? 40 CFR 265.33 (329 IAC 3-17-4)	X	___
	(b) Is emergency equipment in operable condition? 40 CFR 265.33 (329 IAC 3-17-4)	X	___
(16)	Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas.) 40 CFR 265.35 (329 IAC 3-17-6)	___	X

USE AND MANAGEMENT OF CONTAINERS

Location of Unit Container Accumulation Area No. 1

		OK	DF	NI	NA
(1)	Are containers in good condition?	X			
(2)	Are containers compatible with waste in them?	X			
(3)	Are containers managed to prevent leaks?	X			
(4)	Are containers stored closed?	X			
(5)	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive).	X			
(6)	Are incompatible wastes stored in separate containers? (If not, the provisions of 265.17(b) apply)				X
(7)	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				X
(8)	If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
	(a) Special handling?				X
	(b) No Smoking signs?	X			
	(c) Separation and protection from ignition sources?	X			
(9)	Does the container storage area have adequate aisle space (about 2.5 feet)?	X			
(10)	Can containers be inspected for leaks or deterioration without moving the containers during the inspection?	X			

PREPAREDNESS AND PREVENTION

(11)	Security -- security measures include: (HWIMS 300)				
	(a) 24-hour surveillance? or				X
	(b) Barrier around facility including controlled entry?	X			
	(c) Danger sign(s) at entrance?	X			
(12)	Maintenance and Operation of Facility: (HWIMS 140/340, 810 spill)				
	(a) Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	No			

		OK	DF	NI	NA
(13)	If required, does the facility have the following equipment: (HWIMS 140/340)				
	(a) Internal communications or alarm systems?	X			
	(b) Telephone or 2-way radios at the scene of operations?	X			
	(c) Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic sprinklers, or water spray equipment available? (Please specify)	X			
(14)	Whenever waste is being handled, do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? (HWIMS 140/340)	X			

TESTING AND MAINTENANCE OF EMERGENCY EQUIPMENT
(HWIMS 140/340)

(15)	(a) Has the owner or operator established testing and maintenance procedures for emergency equipment?	X			
	(b) Is emergency equipment in operable condition?	X			
(16)	Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas.)	X			

USE AND MANAGEMENT OF CONTAINERS

		YES	NO
(1)	Are containers in good condition? 40 CFR 265.170 (329 IAC 3-23-1)	X	
(2)	Are containers compatible with waste? 40 CFR 265.172 (329 IAC 3-23-3)	X	
(3)	Are containers managed to prevent leaks? 40 CFR 265.173(b) (329 IAC 3-23-4)	X	
(4)	Are containers stored closed? 40 CFR 265.173(d) (329 IAC 3-23-4)	X	
(5)	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). 40 CFR 265.176 (329 IAC 3-23-6)	X	
(6)	Are incompatible wastes stored in separate containers? (If not, the provisions of 265.17(b) apply) 40 CFR 265.177(a) (329 IAC 3-23-7)		NA
(7)	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? 40 CFR 265.177(c) (329 IAC 3-23-7)		NA
(8)	If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?		
	(a) Special handling?		NA
	(b) No Smoking signs?	X	
	(c) Separation and protection from ignition sources? 40 CFR 265.17(a) (329 IAC 3-16-8)	X	
(9)	Does the container storage area have adequate aisle space (about 2.5 feet)? 329 IAC 3-23-4 (c)	X	
(10)	Can containers be inspected for leaks or deterioration without moving the containers 329 IAC 3-23-4 (c)	X	
(11)	*Security -- security measures include:		
	(a) 24-hour surveillance? or		NA
	(b) Barrier around facility including controlled entry?	X	
	(c) Danger sign(s) at entrance? 40 CFR 265.14 (329 IAC 3-16-5)	X	
(12)	Maintenance and Operation of Facility:		
	(a) Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 40 CFR 265.31 (329 IAC 3-17-2)		X

[* TSD's only]

		YES	NO
(13)	If required, does the facility have the following equipment:		
	(a) Internal communications or alarm systems? 40 CFR 265.32(a) & 40 CFR 265.34(a) (329 IAC 3-17-3 & 5)	X	
	(b) Telephone or 2-way radios at the scene of operations? 40 CFR 265.32(b) & 40 CFR 265.34(b) (329 IAC 3-17-3 & 5)	X	
	(c) Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic sprinklers, or water spray equipment available? 40 CFR 265.32(c) (329 IAC 3-17-3 (c)	X	
(14)	Whenever waste is being handled, do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? 40 CFR 265.34(a) (329 IAC 3-17-5)	X	
(15)	(a) Has the owner or operator established testing and maintenance procedures for emergency equipment? 40 CFR 265.33 (329 IAC 3-17-4)	X	
	(b) Is emergency equipment in operable condition? 40 CFR 265.33 (329 IAC 3-17-4)	X	
(16)	Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas.) 40 CFR 265.35 (329 IAC 3-17-6)	X	

USE AND MANAGEMENT OF CONTAINERS

Location of Unit Container Accumulation Area No. 2

		OK	DF	NI	NA
(1)	Are containers in good condition?	X			
(2)	Are containers compatible with waste in them?	X			
(3)	Are containers managed to prevent leaks?	X			
(4)	Are containers stored closed?	X			
(5)	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive).	X			
(6)	Are incompatible wastes stored in separate containers? (If not, the provisions of 265.17(b) apply)				X
(7)	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				X
(8)	If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
	(a) Special handling?				X
	(b) No Smoking signs?	X			
	(c) Separation and protection from ignition sources?	X			
(9)	Does the container storage area have adequate aisle space (about 2.5 feet)?	X			
(10)	Can containers be inspected for leaks or deterioration without moving the containers during the inspection?	X			

PREPAREDNESS AND PREVENTION

(11)	Security -- security measures include: (HWIMS 300)				
	(a) 24-hour surveillance? or				X
	(b) Barrier around facility including controlled entry?	X			
	(c) Danger sign(s) at entrance?	X			
(12)	Maintenance and Operation of Facility: (HWIMS 140/340, 810 spill)				
	(a) Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	No			

		OK	DF	NI	NA
(13)	If required, does the facility have the following equipment: (HWIMS 140/340)				
	(a) Internal communications or alarm systems?	X			
	(b) Telephone or 2-way radios at the scene of operations?	X			
	(c) Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic sprinklers, or water spray equipment available? (Please specify)	X			
(14)	Whenever waste is being handled, do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? (HWIMS 140/340)	X			

TESTING AND MAINTENANCE OF EMERGENCY EQUIPMENT
(HWIMS 140/340)

(15)	(a) Has the owner or operator established testing and maintenance procedures for emergency equipment?	X			
	(b) Is emergency equipment in operable condition?	X			
(16)	Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas.)	X			

USE AND MANAGEMENT OF CONTAINERS

		YES	NO
(1)	Are containers in good condition? 40 CFR 265.170 (329 IAC 3-23-1)	X	
(2)	Are containers compatible with waste? 40 CFR 265.172 (329 IAC 3-23-3)	X	
(3)	Are containers managed to prevent leaks? 40 CFR 265.173(b) (329 IAC 3-23-4)	X	
(4)	Are containers stored closed? 40 CFR 265.173(d) (329 IAC 3-23-4)	X	
(5)	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). 40 CFR 265.176 (329 IAC 3-23-6)	X	
(6)	Are incompatible wastes stored in separate containers? (If not, the provisions of 265.17(b) apply) 40 CFR 265.177(a) (329 IAC 3-23-7)		NA
(7)	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? 40 CFR 265.177(c) (329 IAC 3-23-7)		NA
(8)	If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?		
	(a) Special handling?		NA
	(b) No Smoking signs?	X	
	(c) Separation and protection from ignition sources? 40 CFR 265.17(a) (329 IAC 3-16-8)	X	
(9)	Does the container storage area have adequate aisle space (about 2.5 feet)? 329 IAC 3-23-4 (c)	X	
(10)	Can containers be inspected for leaks or deterioration without moving the containers 329 IAC 3-23-4 (c)	X	
(11)	*Security -- security measures include:		
	(a) 24-hour surveillance? or		NA
	(b) Barrier around facility including controlled entry?	X	
	(c) Danger sign(s) at entrance? 40 CFR 265.14 (329 IAC 3-16-5)	X	
(12)	Maintenance and Operation of Facility:		
	(a) Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 40 CFR 265.31 (329 IAC 3-17-2)		X

[* TSD's only]

		YES	NO
(13)	If required, does the facility have the following equipment:		
	(a) Internal communications or alarm systems? 40 CFR 265.32(a) & 40 CFR 265.34(a) (329 IAC 3-17-3 & 5)	X	___
	(b) Telephone or 2-way radios at the scene of operations? 40 CFR 265.32(b) & 40 CFR 265.34(b) (329 IAC 3-17-3 & 5)	X	___
	(c) Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic sprinklers, or water spray equipment available? 40 CFR 265.32(c) (329 IAC 3-17-3 (c)	X	___
(14)	Whenever waste is being handled, do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? 40 CFR 265.34(a) (329 IAC 3-17-5)	X	___
(15)	(a) Has the owner or operator established testing and maintenance procedures for emergency equipment? 40 CFR 265.33 (329 IAC 3-17-4)	X	___
	(b) Is emergency equipment in operable condition? 40 CFR 265.33 (329 IAC 3-17-4)	X	___
(16)	Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas.) 40 CFR 265.35 (329 IAC 3-17-6)	X	___

TANK SYSTEM(S)
40 CFR 265 - SUBPART J - (329 IAC 3-24)
(HWIMS 170/420)
INTEGRITY ASSESSMENT DEADLINES

Tank System(s)	Deadline
*(1) New	At time of installation
Tank System ID: N/A	Date:
(2) Existing Underground - Cannot Enter (interim status and permitted only)	
Tank System ID: N/A	Date:
(3) All remaining Existing Tanks	
Tank System ID: Inactive tanks awaiting closure	Date: 1/12/88

Secondary Containment Deadlines

Tank System(s)	Deadline
*(1) New	Before putting into use
Tank System ID: N/A	Date:
(2) Existing Underground - Cannot Enter (interim status and permitted only)	
Tank System ID: N/A	Date:
(3) Existing that S/T Dioxin Waste	June 20, 1990
Tank System ID: N/A	Date:

*New Tank System = operation or installation commenced after July 14, 1986

(4) Existing-Age Known/ Documentation — June 20, 1990/when tank reaches 15 years old, whichever is later

Tank System ID: N/A — Date: _____

(5) Existing-Age Unknown Facility Age greater than 7 years old — June 20, 1990/when facility reaches 15 years old, whichever is later

Tank System ID: N/A — Date: _____

(6) Existing-Age Unknown Facility Age less than 7 years old — June 20, 1990

Tank System ID: N/A — Date: _____

Note: All hazardous waste tanks on site have been emptied and cleaned since March, 1991. ACS is pursuing certified closure on all hazardous waste tanks.

TANK SYSTEMS

40CFR 265 - SUBPART J - (329 IAC 3-24-5)

GENERAL OPERATING REQUIREMENTS

	YES	NO	NI	NA
1. Are spill prevention controls (e.g., check valves, dry disconnect couplings) in use? 329 IAC 3-24-5(b)1	___	___	___	X
2. Are overfill prevention controls (e.g, level sensing devices, high level alarms) present and operational? 329 IAC 3-24-5(b)2	___	___	___	X
3. Is sufficient freeboard maintained in uncovered tanks to prevent overtopping due to wave or wind action or by precipitation? 329 IAC 3-24-5(b)3	___	___	___	X
4. Has the owner/operator complied with the requirements of 329 IAC 3-24-7 if a leak or spill has occurred in the tank system? (See "leak and spill checklist") 329 IAC 3-24-5(c)	___	___	___	X

TANK SYSTEMS

40CFR 265 - SUBPART J - (329 IAC 3-24-6)

GENERAL INSPECTION REQUIREMENTS

	YES	NO	NI	NA
1. Does the owner/operator inspect, where present, overfill spill control equipment (e.g., waste-feed cutoff systems, bypass systems, and drainage systems) to ensure that it is in good working order, at least once each operating day? 329 IAC 3-24-6(a)1	X			
2. Does the owner/operator inspect the above ground portions of the tank system to detect corrosion or release of waste once each operating day? 329 IAC 3-24-6(a)2	X			
3. Does the owner/operator inspect data gathered from monitoring equipment and leak-detection equipment (e.g., pressure and temperature gauges, monitoring wells) to ensure that tank system is operated according to design once each operating day? 329 IAC 3-24-6(a)3	X			
4. Does the owner/operator inspect the construction materials and the area immediately surrounding the accessible portion of the tank system including secondary containment structure to detect erosion or signs of releases once each operating day? 329 IAC 3-24-6(a)4	X			
5. Has the owner/operator confirmed, if present, the proper operation of the cathodic protection system within six (6) months of initial installation? 329 IAC 3-24-6(b)1				X

Date of installation _____ Date of inspection _____

6. Does the owner/operator inspect the cathodic protector system annually after installation? 329 IAC 3-24-6(b)1				X
7. Does the owner/operator inspect all sources of impressed current at least bi-monthly (every other month)? 329 IAC 3-24-6(b)2				X

Method used to inspect impressed-current system _____

8. Does the owner/operator document the above-mentioned inspections (#1-7)? 329 IAC 3-24-6(c)				X

TANK SYSTEM(S)

40CFR 265 - SUBPART J - (329 IAC 3-24-2)

EXISTING TANK SYSTEMS INTEGRITY ASSESSMENT

Tank System I.D. Inactive tanks awaiting closure

Tank Volume: 3,000 to 23,000 gallons Tank Type: aboveground
above, on, in, below ground

	YES	NO	NI	NA
1. Does the tank system have secondary containment? 329 IAC 3-24-4		X		

If yes, see Secondary Containment Checklist. If no, continue below.

Date when integrity assessment is required: 1/12/88

Date when integrity assessment is required: _____

	YES	NO	NI	NA
2. Has the facility been granted a variance (exemption) from secondary containment per 329 IAC 3-24-4(g)		X		
3. Is a written assessment of tank system integrity on file? 329 IAC 3-24-2(a)	X			
4. If assessment is provide, has it been reviewed and certified by an independent, registered, professional engineer?	X			
5. Does the integrity assessment include the following: 329 IAC 3-24-2(a)				
a. Documented age of tank system.	X			
b. Design standards, if available, which the tank and ancillary equipment were constructed.	X			
c. Hazardous characteristics of the waste that have been or will be handled.	X			
d. Existing corrosion protection measures.	X			
e. Results of leak test, internal inspection, or other tank system integrity exams.	X			

	YES	NO	NI	NA
6. Did the integrity assessment consist of a leak test? 329 IAC 3-24-2(b)5B	X			

Method of leak testing used: pressure was applied to pipes and thickness readings on tank

-or-

7. Did the integrity assessment consist of a certified internal inspection that addresses cracks, leaks, corrosion and erosion? 329 IAC 3-24-2(b)5B			X	
8. Has a leak test or internal inspection by an independent, qualified, registered professional engineer that addresses cracks, leaks, corrosion, and erosion been done annually? 329 IAC 3-24-4(i)	X			

Non-Enterable, Underground Tanks

1. Does the assessment consist of a leak test that takes into account the effects of: 329 IAC 3-24-2(b)5A				
a. temperature variations				X
b. tank end deflection				X
c. vapor pockets				X
d. high water table effects				X

Method of leak testing used: _____

2. If so, has this leak test been done annually? 329 IAC 3-24(i)1				X

TANK SYSTEM(S)

40CFR 265 - SUBPART J - (329 IAC 3-24-3)

NEW TANK SYSTEMS

Tank Volume: 3,000 to 23,000 gallons Tank Type: above ground
above, on, in, below ground

Tank Construction: Carbon Steel
fiberglass, reinforced plastic, mild steel, etc.

	YES	NO	NI	NA
1. Has the owner/operator obtained a written assessment reviewed and certified by an independent engineer attesting that the system has sufficient structural integrity and is acceptable for S/T of hazardous waste? 329 IAC 3-24-3(a)	___	___	___	X
2. Does the assessment include the following:				
a. Design standards according to which the tank(s) will be constructed. 329 IAC 3-24-3(a)1	___	___	___	X
b. Hazardous characteristics of the waste(s) to be handled. 329 IAC 3-24-3(a)2	___	___	___	X
c. For tank systems in which the external shell of a metal tank or any component is or will be in contact with the soil or water. Has a corrosion expert conducted a corrosion potential assessment? 329 IAC 3-24-3(a)3A	___	___	___	X
d. Has a corrosion expert determined the type and degree of external corrosion protection that are needed to ensure the integrity of the tank system? 329 IAC 3-24-3(a)3B	___	___	___	X
e. For tank systems that are affected by vehicular traffic, has a determination been made of design and/or operational measures that will protect the tank system against damage. 329 IAC 3-24-3(a)4	___	___	___	X
f. Have design considerations been given to ensure proper tank foundations, anchoring, and prevention of frost heave. 329 IAC 3-24-3(a)5	___	___	___	X
3. Has a qualified installation inspector or independent engineer inspected the tank installation prior to covering, enclosing, or placing a new tank system in use? 329 IAC 3-24-3)b)	___	___	___	X

	YES	NO	NI	NA
4. Did the inspection check for the presence of the following:				
weld breaks	___	___	___	X
punctures	___	___	___	X
scrapes of protective coatings	___	___	___	X
cracks	___	___	___	X
corrosion	___	___	___	X
other structural damage, or inadequate construction 329 IAC 3-24-3(b)	___	___	___	X
5. Has the tank system been tested for tightness prior to being covered, enclosed, or put in use? 329 IAC 3-24-3(d)	___	___	___	X
6. Has the owner/operator provided, and has a corrosion expert supervised the installation of, any field fabricated corrosion protection (e.g., cathodic protection)? 329 IAC 3-24-3-(f)	___	___	___	X
7. Has the owner/operator obtained and kept on file written statements by those persons requested to certify the design and supervise the installation of the tank system in accordance with 329 IAC 3-24-3(b thru f)? 329 IAC 3-24-3(g)	___	___	___	X
8. Do these written statement include the certification statement as requested by 329 IAC 3-34-2(b) 329 IAC 3-24-3(g)	___	___	___	X

TANK SYSTEM(S)

40CFR 265 - SUBPART J - (329 IAC 3-24-4)

SECONDARY CONTAINMENT

Secondary Containment consists of the following:

(Circle one) liner, vault, double-walled component, an equivalent device as approved

Type of leak detection equipment employed: _____

_____

	YES	NO	NI	NA
*1. Is the secondary containment system constructed of or lined with materials that are compatible with the waste and have sufficient strength and thickness to prevent failure? 329 IAC 3-24-4(c)1	___	___	___	X
*2. Is the secondary containment system placed on a foundation or base capable of providing support? 329 IAC 3-24-4(c)2	___	___	___	X
3. Is the secondary containment system provided with a leak detection system that will detect the failure or either the primary or secondary containment structure with 24 hours? 329 IAC 3-24-4(c)3	___	___	___	X
4. Is the secondary containment system sloped or otherwise designed or operated to drain and remove liquids within 24 hours? 329 IAC 3-24-4(c)4	___	___	___	X
*5. Will the secondary containment (liners and vaults) contain 100% of the design capacity of the largest tank in its boundary plus a 25 year - 24 hour rainfall? 329 IAC 3-24-4(e)1A and 2A	___	___	___	X
6. Is the secondary containment system designed or operated to prevent run-on or infiltration or precipitation into the system unless the collection system has sufficient excess capacity to contain run-on or infiltration? 329 IAC 3-24-4(e)1B and 2B	___	___	___	X
7. External Liner Systems				
a. Does the liner cover all the surrounding earth likely to come into contact with wastes, including berms and dikes? 329 IAC 3-24-4(e)1D	___	___	___	X

	YES	NO	NI	NA
b. Whether clay, polymeric, or concrete, is the liner free of cracks, gaps, tears, rips, etc.? 329 IAC 3-24-4(e)1C	___	___	___	X
8. Vault Systems				
a. Is the vault constructed with chemically resistant water stops at all joints? 329 IAC 3-24-4(e)2C	___	___	___	X
b. Does all concrete, including sumps, have an impermeable coating or lining? 329 IAC 3-24-4(e)2D	___	___	___	X
c. Is there deterioration of protective coatings or liners such as discoloration and film lifting or cracks? 329 IAC 3-24-4(e)2D	___	___	___	X
d. Is the vault provided with a means to protect against the formation of and ignition of vapors within the vault if ignitable or reactive waste is treated or stored? 329 IAC 3-24-4(e)2E	___	___	___	X
9. Double-Walled Tanks				
a. If metal, is there appropriate corrosion protection for the inner and outer shell? 329 IAC 3-24-4(e)3B	___	___	___	X
b. Does the double-walled tank have an operational, built-in continuous leak-detection system capable of detecting a release within 24 hours or at the earliest practical time? 329 IAC 3-24-4(e)3C	___	___	___	X
10. Ancillary Equipment Exempt from Secondary Containment				
a. Is all above-ground, straight piping that is not covered by secondary containment visually inspected daily? 329 IAC 3-24-4(f)1	___	___	___	X
b. Are all welded flanges, welded joints, and welded connections visually inspected for leaks daily? 329 IAC 3-24-4(f)2	___	___	___	X
c. Are all sealless or magnetic coupling pumps visually inspected for leaks daily? 329 IAC 3-24-4(f)3	___	___	___	X
d. Are all pressurized, above ground piping systems with automatic shutoff devices visually inspected daily? 329 IAC 3-24-4(f)4	___	___	___	X

TANK SYSTEMS

40CFR 265 - SUBPART J - (329 IAC 3-24-4.7)

RESPONSES TO LEAKS AND SPILLS

	YES	NO	NI	NA
1. In the event of a spill or leak, did the owner/operator immediately remove the tank system from service and inspect the system for the cause of the release? 329 IAC 3-24-4-7(a)	___	___	___	X
2. Was waste removed form leaking tank system and secondary containment within 24 hours of being detected, or at the earliest practicable time? 329 IAC 3-24-7(a)2	___	___	___	X
3. Were visible releases to the environment contained and immediately removed? 329 IAC 3-24-7(a)2	___	___	___	X
4. In the event of a release to the environment, did the owner/operator report the incident to the Commissioner within 24 hours? 329 IAC 3-24-7(a)4A	___	___	___	X
5. Did the owner/operator submit a written report to the Commissioner within 30 days of a release to the environment with the required information? 329 IAC 3-24-7(a)4C	___	___	___	X
6. In the event of a release, has the tank system or secondary containment system been repaired or closed as required? 329 IAC 3-24-7(a)5	___	___	___	X
7. Were any extensive repairs to the tank system or secondary containment system certified by an independent, qualified, registered engineer. 329 IAC 3-24-7(a)6	___	___	___	X

TANK SYSTEMS

40CFR 265 - SUBPART J - (329 IAC 3-24-9 and 10)

IGNITABLE OR REACTIVE WASTE

	YES	NO	NI	NA
1. Has the waste been treated, mixed or, otherwise rendered nonreactive or not ignitable? 329 IAC 3-24-9(a)1	___	___	___	X
2. Is the tank protected from conditions that may cause it to ignite (use of spark proof tools) or protected from contact with materials that may cause it to react? 329 IAC 3-24-9(a)2	___	___	___	X
3. Is the required National Fire Protection Association distance between waste tanks (ignitable waste) and public ways and adjoining properties maintained? 329 IAC 3-24-9(b)	___	___	___	X
4. Has an appropriate method of tank system decontamination been selected for tanks which previously held incompatible waste? 329 IAC 3-24-10(a and b)	___	___	___	X

No waste on site

TANK SYSTEMS

PREPAREDNESS AND PREVENTION

	YES	NO	NI	NA
1. Security - Do security measures include: (HWIMS 300)				
a. 24-hour surveillance?	___	X	___	___
b. Barrier around facility including controlled entry?	X	___	___	___
c. Danger sign(s) at entrance?	X	___	___	___
2. Maintenance and Operation of Facility (HWIMS 140/340, 810 spill)				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	___	X	___	___
3. If required, does the facility have the following equipment? (HWIMS 140/340)				
a. Internal communications or alarm systems?	X	___	___	___
b. Telephone or 2-way radios at the scene of operations?	X	___	___	___
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify)	X	___	___	___
4. Whenever waste is being handled, do all personnel have immediate access to an alarm or communication device (through contacting another employee who is always available)? (HWIMS 140/340)	X	___	___	___
Testing and Maintenance of Emergency Equipment				
5. a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	X	___	___	___
b. Is emergency equipment in operable condition?	X	___	___	___
6. Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas.)	X	___	___	___

G 4-6-92

RECEIVED
APR 3 1992
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. GENERAL INFORMATION

Facility: American Chemical Services, Inc.

U.S. EPA ID No.: IND 016 360 265

Street: 420 South Colfax Avenue

City: Griffith State: IN Zip: 46319

Telephone: 219/924-4370

Inspection Date: 1 / 24 / 92 Time: 9:15 (am/pm)

Weather Conditions: Sunny; about 25° F

	Name	Agency/Title	Telephone
Inspectors:	Jack Brunner	PRC for IDEM; Lead Inspector	312/856-8700
	Lorraine Morris	PRC for IDEM; Inspector	312/856-8700
Facility Representatives:	James Tarpo	ACS/General Manager	219/924-4370
	James Murphy	ACS/Plant Manager	219/924-4370

See Appendix B to determine which of the following LDR waste categories the facility manages:

	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents	X				
F020-F023 and F026-F028					
California List*					
First Third [40 CFR 268.10]					
Second Third [40 CFR 268.11]					
Third Third [40 CFR 268.12]	X				

* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

American Chemical Services, Inc. (ACS), manufactures plasticizers and fuel additives. These products are filtered throughout the manufacturing, generating liquid and solid wastes. ACS no longer accepts waste from off site.

LDR Waste Management:

Hazardous waste is stored in drums in the outdoor drum storage area, the epoxidation building, and the additive blending building until it is transported off site to permitted facilities with manifests and appropriate LDR notifications.

Summary:

ACS currently operates as a small-quantity generator of hazardous waste. However, PRC inspected ACS as a treatment, storage, and disposal (TSD) facility because ACS has not received closure approval for hazardous waste storage tanks, the solids mixing area, the receiving facility, and the outdoor drum storage area. Violations cited during the January 24, 1992 compliance inspection included personnel training record deficiencies, nonretention of test results and analyses, improper aisle space in the outdoor drum storage area, and storing hazardous waste on site for longer than 1 year.

Signature:

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents:

   F001, F002, F003, F005

2. F020-F023 and F026-F028 dioxin-containing wastes:

   _____

3. California List Wastes (See Appendix A):

   _____

4. First Third Wastes [40 CFR 268.10]:

   _____

5. Second Third Wastes [40 CFR 268.11]:

   _____

6. Third Third Wastes [40 CFR 268.12]**:

   D001, D035, D039, D040

* See Appendix B

** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic [55 FR 22531].

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?*

   Yes X No____

   If no, list below:

Assigned Classification	Correct Classification
_____	_____
_____	_____
_____	_____

** Areas of concern include: California List waste categories with more stringent treatment standards; listed characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments:_____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes_X_ No___ NA___

Comments:_____

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes___ No___ NA_X_

* Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes___ No___

Comments:_____

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires 11/08/90). [40 CFR 268.30(c)]

Yes___ No_X_ List_____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires 11/08/90). [40 CFR 268.31(b)]

Yes___ No_X_ List_____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires 11/08/90). [40 CFR 268.32(d)(2)]

Yes___ No_X_ List_____

4. K048-K052 petroleum wastes (nonwastewaters; expires 11/08/90). [40 CFR 268.35(b)]

Yes___ No_X_ List_____

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K0966, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires 06/09/91). [40 CFR 268.34(d)]

Yes___ No_X_ List_____

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A (expires 05/08/92). [40 CFR 268.35(e)]

Yes___ No_X_ List_____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151 (expires 05/08/92). [40 CFR 268.35(c)]

Yes___ No_X_ List_____

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires 05/08/92). [40 CFR 268.35(c)]

Yes___ No_X_ List_____

9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refactory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires 05/08/92). [40 CFR 268.35(c)]

Yes___ No_X_ List_____

*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires 05/08/92). [40 CFR 268.35(c)]

Yes___ No_X_ List_____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires 05/08/92)*. [40 CFR 268.35(d)]

Yes___ No_X_ List_____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

   Yes_X_ No____ NA____

   If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
F001	_____	X
F002	_____	X
F003 and F005	_____	X

* Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

Comments:_____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

   Yes____ No____ NA_X_

   If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

Comments:_____

3. First, Second, and Third Third Wastes:

   a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

      Yes_X_ No____ NA____

If available, list each waste code and check the correct treatability group.

Waste Code	Subcategory	Wastewater*	Nonwastewater
D001, D035 D039, D040	_____	_____	X
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K014 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments:_____

b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9(b)]

Yes X No____ NA____

c. Does the generator specify alternative treatment standards for lab packs?*

Yes____ No____ NA X

* Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes?* [40 CFR 268.42(c)(2)]

_____ Organometallics: 40 Part 268, Appendix IV constituents
_____ Organics: 40 CFR Part 268, Appendix V constituents

* Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

d. Does the generator specify alternative treatment standards for F039 multisource leachate?*

Yes____ No____ NA X

* Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

a. Liquid hazardous wastes containing PCBs ≥ 50 ppm

Yes____ No____ NA X

If yes, check the appropriate treatability group:

_____ 50 to 500 ppm PCBs
_____ ≥ 500 ppm PCBs

b. Listed or characteristic wastes containing ≥ 1,000 mg/l (liquids) or mg/kg (nonliquids) HOCs, which are not listed or characterized by the HOC content.

Yes___ No___ NA_X_

If yes, check the appropriate treatability group:

_____ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)

_____ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (nonliquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥ 130 mg/l thallium

Yes___ No___ NA_X_

5. National Capacity Variance Wastes: If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A)

Yes___ No___ NA_X_

If California List prohibitions apply, complete the following table for each waste code, noting the date on which the national capacity variance expires.

Waste Code	California List Applicability	Expiration Date
_____	_____	__/__/__
_____	_____	__/__/__

Comments:_____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes___ No___ NA_X_

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
_____	_____	_____	_____
_____	_____	_____	_____

Comments:_____

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes___ No_X_

If yes, did the generator select the most stringent treatment standards? [40 CFR 268.41(b) and 268.43(b)]

Yes___ No___

Comments:_____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes_X_ No___

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes___ No___ (Go to 3.)

Comments: _____

2. Which of the following methods does the generator use to make this determination (more than one may apply)?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

a. Knowledge of waste:

Yes_X_ No___

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

Facility assigns characteristic codes to F001, F002, F003, F005, D001, D035, D039, D040 filter waste based on knowledge of the material.

b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes___ No_X_ NA___

* TCLP = Toxicity Characteristic Leaching Procedure [40 CFR Part 268, Appendix I, EPA Test Method 1311)

** See Appendix C for exceptions

*** BDAT = Best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

_____

_____

c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes___ No___ NA_X_

* See Appendix C for exceptions

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

_____

_____

d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes___ No___ NA_X_

* PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

_____

_____

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes___ No_X_ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes___ No___

If yes, has the generator prepared a waste analysis detailing the frequency of testing to be conducted? [40 CFR 268.7(a)(4)]

Yes___ No___ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

_____ Based on a detailed chemical and physical analysis of a representative sample.

_____ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements.

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes___ No___

Comments:_____

4. Dilution Prohibition [40 CFR 268.3]:

a. Does the generator mix prohibited* wastes with different treatment standards?

* See Appendix E for distinction between restricted and prohibited wastes.

Yes___ No_X_ (If no, go to b.)

List the wastes_____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes___ No___

Comments:_____

b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666j]

Yes___ No_X_ (If No, go to c.)

Check appropriate category:

_____ Dilutes to meet treatment standards
_____ Dilutes to render waste nonhazardous

Do the wastes fall into the following categories? (Check if appropriate) [40 CFR 268.3(b)]

_____ Managed in treatment systems regulated under the Clean Water Act
_____ Nontoxic* characteristic wastes
_____ Treatment standard specified in 40 CFR 268.41 or 268.43

* Nontoxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes___ No_X_

Comments:_____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes___ No___ NA_X_

C. Management

1. On-Site Management

a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes_X_ No___

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator or greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste.

Comments: The facility was storing hazardous waste generated during closure activities for greater than 90 days.

b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes___ No___ NA_X_

c. If the generator treats characteristic wastes in RCRA exempt units to render them nonhazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes___ No___ NA_X_

* This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

a. Does the generator ship any waste that exceeds treatment standards/prohibition levels to an off-site treatment or storage facility?

Yes_X_ No___ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
D035, D039, D040	Marine Shale Processors, Inc.

Does the generator provide a notification to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes_X_ No____ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes___ No____ NA_X_

b. Is a notification sent with each waste shipment?

Yes_X_ No____

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes___ No____ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes___ No____

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes___ No_X_ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes___ No____ (If No, go to b.)

b. Are a notification and a certification sent with each waste shipment?

Yes___ No___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes___ No___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes___ No___

c. Are characteristic wastes which have been rendered nonhazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes___ No___ NA___ (If No, go to 4.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes___ No___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions.

a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes___ No_X_ (If No, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes___ No____

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes_X_ No____

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes___ No____ NA_X_

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision?*

Yes___ No____ NA_X_

* See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments:_____

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes___ No_X_ (If No, do not complete this section)

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes

2. Are treatment residuals generated from these units?

Yes___ No____

Comments:_____

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

Yes____ No____ NA____

(If yes, the TSD checklist must also be completed)

E. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

_____

_____

_____

_____

_____

_____

_____

_____

_____

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

IV. TSD REQUIREMENTS

A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

1. Does the waste analysis plan address the following LDR waste categories? [40 CFR 264.13(b)(6) and 265.13(b)(6)]

F001-F005 Spent Solvents	Yes_X_	No___	NA___
F020-F023 and F026-F028 Dioxins	Yes___	No___	NA___
California List Wastes	Yes___	No___	NA___
First, Second and Third Third Wastes	Yes_X_	No___	NA___

Comments:_____

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes___ No___ NA_X_

3. What date was the waste analysis plan last revised? 6 / 30 / 86

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

Yes_X_ No___

If yes, which of the following are sources of analytical data? (More than one may apply):

_X_ Generator provides data
_X_ Facility performs analyses on on-site laboratory
___ Facility contracts analyses at off-site laboratory

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes_X_ No___ NA___

If analyses are conducted off-site, identify lab:_____

a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity/characteristic leaching procedure (TCLP)?* (BDAT** = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes___ No___ NA_X_

* See Appendix C for exceptions
** BDAT = Best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.73(b)(3) and 265.73(b)(3)]

_____

_____

b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]

Yes___ No___ NA_X_

* See Appendix C for exceptions

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

_____

_____

c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in *liquid* hazardous waste? [40 CFR 268.32(i)]

Yes___ No___ NA_X_

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

_____

_____

B. Operating Record [40 CFR 264.73 and 265.73]

1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes_X_ No___

2. Does the operating record contain copies of LDR notifications and certifications?* [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]

Yes_X_ No___

* Include both those received from generators, and those prepared for off-site shipments.

3. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]

Yes___ No___ NA_X_

Does the documentation discussed in points 2 and 3 reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision?*

Yes___ No___ NA_X_

* Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. Storage [40 CFR 268.50]

1. Are prohibited* wastes stored on site in containers?

Yes_X_ No___ (If No, go to 2.)

*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes_X_ No___

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes_X_ No___ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate proper recovery, treatment or disposal? [40 CFR 268.50(c)]

Yes___ No_X_

If yes, state how:_____

2. Are prohibited wastes stored on site in tanks?

Yes___ No_X_ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes___ No___

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes___ No___ (If No, go to 3.)

Can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes___ No___

If yes, state how:_____

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes___ No_X_ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 762.65(b)? [40 CFR 268.50(f)]

Yes___ No___

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes___ No___

D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes___ No_X_ (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes___ No___ NA___ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes___ No___

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes___ No___ NA___

4. Describe all other waste codes and treatment processes:

Waste Code	Treatment Processes

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?*

Yes____ No____

* This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes____ No____

Comments:_____

6. Dilution Prohibition [40 CFR 268.3]:

a. Does the facility mix prohibited wastes with different treatment standards?

Yes____ No____ (If No, go to c.)

List the wastes_____

b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes____ No____

If yes, is this method used for the aggregated wastes?

Yes____ No____

Comments:_____

c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes____ No____

Comments:_____

7. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes? [40 CFR 268.7(b)]

Yes____ No____

Comments:_____

8. Does the facility ship any characteristic wastes which have been rendered nonhazardous to a Subtitle D facility?

Yes____ No____ (If No, go to 9.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes____ No____

9. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?

Yes____ No____ (If No, go to 10.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are a notification and a certification provided to the land disposal facility with each waste shipment? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]

Yes____ No____

10. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?

Yes____ No____ (If No, go to E.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes____ No____

E. Surface Impoundments [40 CFR 268.4]

1. Are restricted wastes placed in surface impoundments for treatment?

   Yes___ No_X_ (If No, do not complete this section. Go to F.)

   List:_____

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

   Yes___ No___

   Comments:_____

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

   Yes___ No___

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

   Yes___ No___ NA___

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

   Yes___ No___

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

   Yes___ No___

   Comments:_____

7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge	Yes___	No___	Waste Code_____
Supernatant	Yes___	No___	Waste Code_____

   Provide the frequency of analyses conducted on treatment residues:

   _____

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes___ No___ NA___

Comments:_____

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes___ No___

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes___ No___ NA___

Comments:_____

F. Land Disposal

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]

Yes___ No_X_ (If No, do not complete this section. Go to G.)

*Note: Do not include surface impoundments addressed in E.

If yes, specify which units and what wastes each unit has received:

Unit	Waste

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]

Yes___ No___

Comments:_____

3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?* [40 CFR 268.9(c)]

Yes___ No___ NA___

*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes___ No___

If yes, at what frequency are analyses performed?_____

_____

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes___ No___ (If No, go to 6.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C)_____
Case-By-Case Extension (40 CFR 268.5)_____
No-Migration Petition (40 CFR 268.6)_____
Treatment Standard Variance (40 CFR 268.44_____

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by-case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes___ No___ NA___

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)?

Yes___ No___ NA___

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes___ No___ NA___

6. Are restricted wastes placed in underground injection wells?

Yes___ No___ List_____

G. Other Wastestreams

1. Does the facility generate wastes other than residues from RCRA treatment units?

Yes_X_ No___ (If No, go to H.)

2. On-Site Management

a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes___ No___ NA_X_

b. If characteristic wastes are treated in RCRA exempt units to render them nonhazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes___ No____ NA_X_

* This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

3. Off-Site Management: Waste Exceeds Treatment Standards

Are wastes that exceed treatment standards/prohibition levels to an off-site treatment or storage facility?

Yes_X_ No____ (If No, go to 4.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
D001	Marine Shale Processors, Inc.

Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes_X_ No____ (If No, go to 4.)

If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes___ No____ NA_X_

4. Off-Site Management: Wastes Meets Treatment Standards

a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes_X_ No____ (If No, go to 5.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
D001	Marine Shale Processors, Inc.

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes_X_ No____

b. Are characteristic wastes which have been rendered nonhazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes___ No___ N/A

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes___ No___

5. Dilution Prohibition [40 CFR 268.3]:

a. Are prohibited* wastes with different treatment standards mixed?

* See Appendix E for distinction between restricted and prohibited wastes.

Yes___ No_X_ (If No, go to b.)

List the wastes_____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes___ No___

Comments:_____

b. Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666j]

Yes___ No_X_ (If No, go to c.)

Check appropriate category:

_____ Dilutes to meet treatment standards
_____ Dilutes to render waste nonhazardous

Do the wastes fall into the following categories? (Check if appropriate) [40 CFR 268.3(b)]

_____ Managed in treatment systems regulated under the Clean Water Act
_____ Nontoxic* characteristic wastes
_____ Treatment standard specified in 40 CFR 268.41 or 268.43

* Nontoxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes____ No_X_

Comments:_____

H. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

_____

_____

_____

_____

LDR

Kromnicki 6-4-91

TSD - RCRA INSPECTION REPORT

RECEIVED
JUN 0 4 1991
OFFICE OF
Waste Managem
U.S. E.P.A.

EPA ID # IND 016 360 265 NAME American Chemical Services, Inc

MAILING ADDRESS: 420 South Colfax
Griffith, Ind. 46319

LOCATION ADDRESS: (same)

CONTACT: James Tarpo PHONE: 219/924-4370

OWNERSHIP: ACS Inc. COUNTY: Lake

STATUS CODE: 5 1=Active 3=Dead Mail 4=PCB handler
6=non-handler 2=Obsolete ID # 9=Superfund site
5=Out of business / Hazardous Waste /

ACTIVITY: (This should reflect the actual functioning of the facility)

LQG ✓ SQG ____ CEG ____ TRANSPORTER ____ TSD ✓ UI ____

TRANSPORTERS: Air ____ Rail ____ Hwy ____ Water ____ Other ____

HAZARDOUS WASTE FUEL : Gen mktg burner X other mktr ____ burner ____
OFF SPEC USED OIL FUEL : Gen mktg burner ____ other mktr ____ burner ____
SPEC USED OIL FUEL MKTR :
BURNING DEVISE : Util boiler ____ Indus boiler X Indus furn ____

Person(s) interviewed:	Title:	Telephone:
Jim Murphy	Plant Manager	219-924-4370
John Murphy	RCRA Coor.	"

Inspector(s):	Agency:	Telephone:
Ted Warner	IDEM (OSHWM)	317-232-4462

Date of inspection: 3-8-91 Time of inspection: 9:15 AM

	OK	DF	NI	NA
iii. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must decribe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.) 40 CFR 265.52(f) (329 IAC 3-18-3)	✓			
2) Emergency Coordinator:				
a. Is the facility Emergency Coordinator identified? 40 CFR 265.52(d) (329 IAC 3-18-3)	✓			
b. Is coordinator familiar with all aspects of site operation and emergency procedures? 40 CFR 265.55 (329 IAC 3-18-6)	✓			
c. Does Emergency Coordinator have the authority to carry out the Contingency Plan? 40 CFR 265.55 (329 IAC 3-18-6)	✓			

Preparedness and Prevention

1) Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility? 40 CFR 265.37 (329 IAC 3-17-7) (HWIMS 340)	✓			
2) Are copies of the Contingency Plan available at the site and local emergency organizations? 40 CFR 265.53 (329 IAC 3-18-4) (HWIMS 350)	✓			
3) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56 (329 IAC 3-18-7)? (HWIMS 350)				✓

MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING:

		OK	DF	NI	NA
1)	Use of Manifest System: (HWIMS 360)				
a.	Does the facility follow the procedures listed in 265.71 (3-19-2) for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	✓			
b.	Are records of past shipments retained for three (3) years? 40 CFR 265.71(b)5 (329 IAC 3-19-2)	✓			
2)	Has the facility submitted copies of hazardous waste manifests to the Department within five (5) working days after receiving hazardous waste? (This requirements applies to both Indiana's and other states hazardous waste manifests)?				✓
3)	Does the owner or operator meet requirements regarding manifest discrepancies? (Off-site facilities only) 40 CFR 265.72 (329 IAC 3-19-3)	✓			
4)	Unmanifested Waste Reports: (applies only to Off-site facilities)				
a.	Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 (3-8-1) without a manifest or shipping paper? 40 CFR 265.76 (329 IAC 3-19-7)				
b.	If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type and date received for each unmanifested hazardous waste shipment.				
c.	Has the facility submitted 8700-13B (unmanifested waste report)?				
5)	Closure/Post Closure				
a.	Is the closure plan available for inspection? 40 CFR 265.112(a) (329 IAC 3-21-3) (HWIMS 390)	✓			
b.	Is the post-closure plan available for inspection? (for disposal facilities only) 40 CFR 265.118(a) (329 IAC 3-21-8) (HWIMS 390)				✓
c.	Has the closure cost and post closure cost estimate been revised annually to account for inflation. (HWIMS 400)	✓			

6) Operating Record: (HWIMS 370)

	OK	DF	NI	NA
a. Does owner or operator have a operating record? 40 CFR 265.73(a)	✓			
b. Does the owner or operator maintain an operating record that contains the following information?				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR 265 Appendix I (329 IAC 3-32-2)? 40 CFR 265.73(b)(1) (329 IAC 3-19-4)	✓			

Summarize how the facility tracks the method and date of TSD activity.

O.R. Record

ii. The location and quantity of each hazardous waste within the facility? (This information shall be cross referenced to a specific manifest number if the waste was accompanied by manifest.) 40 CFR 265.73(b)(2) (329 IAC 3-19-4)	✓			

Summarize how the facility tracks the location and quantity of waste.

iii. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross referenced to specific manifest number, if accompanied by a manifest.) 40 CFR 265.73(b)(2) (329 IAC 3-19-4)				✓
iv. Records and results of all waste analyses, trial tests, monitoring data, and operating inspections? 40 CFR 265.73(b)(3)(5)(6) (329 IAC 3-19-4)	✓			
v. Reports detailing all incidents that required implementation of the Contingency Plan? 40 CFR 265.73(b)(4) (329 IAC 3-19-4)				✓
vi. All closure and post closure costs as applicable? 40 CFR 265.73(b)(7) (329 IAC 3-19-4)	✓			

GROUNDWATER MONITORING

40 CFR Subpart F

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

		OK	DF	NI	NA
1)	Has the owner or operator of the facility implemented a groundwater monitoring system? 40 CFR 265.90(a) (329 IAC 3-20-1) (HWIMS 380)				✓
2)	Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in 265.90(d) (329 IAC 3-20-1)? (HWIMS 380)				✓

APPENDIX GN

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Manifest Requirements: (HWIMS 110)	OK	DF	NI	NA
1) Does the operator have copies of the manifest available for review? 40 CFR 262.40 (329 IAC 3-10-1)	✓			
2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period	Last RR. con -3-1-91 " Pails 12-19-90			
3) Do the manifest forms examined contain the following information. 40 CFR 262.21 (329 IAC 3-8-1)				
a. Manifest document number? EPA ID No. + Unique 5 digit No.? (A sequential number for all manifests before September 20, 1984, and a five digit unique number after September 20, 1984.)	✓			
b. Name, mailing address, telephone number, and EPA ID number of generator?	✓			
c. Name, telephone number (3-14-3) and EPA ID Number of Transporter(s)?	✓			
d. Name, Address, telephone number (3-14-3) and EPA ID Number of designated permitted facility?	✓			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
f. The total quantity of waste(s) and the type and number of containers loaded?	✓			
g. Required certification?	✓			
h. Required signatures?	✓			
i. EPA hazardous waste number (3-14-3)?	✓			

		OK	DF	NI	NA
4)	For hazardous waste shipments to Indiana facilities (or hazardous waste shipments to states that do not supply manifests) has the generator used the Indiana Hazardous Waste Manifest? 329 IAC 3-8-2	✓			
5)	Has the generator submitted copies of hazardous waste manifests to the Department within five (5) working days after shipping hazardous waste? (This requirement applies to both Indiana's and other states hazardous waste manifests). 329 IAC 3-8-4	✓			

6) Reportable exceptions:
40 CFR 262.42 (329 IAC 3-10-3) (HWIMS 180)

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. none

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) (329 IAC 3-10-3) to the Regional Administrator.

INTERNATIONAL SHIPMENTS: (HWIMS 190)

		OK	DF	NI	NA
1)	Has the installation imported or exported hazardous waste? 40 CFR 262.50 (329 IAC 3-11-1) (If answered Yes, complete the following as applicable.)				✓
a.	Exporting hazardous waste; has a generator:				
i.	Notified the administrator in writing?				
ii.	Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
iii.	Met the Manifest requirements?				
b.	Importing hazardous waste; has the generator met the manifest requirements?				

RECORDKEEPING AND REPORTING:

		OK	DF	NI	NA
1)	Has the generator made a proper hazardous waste determination for all solid wastes generated at the facility? 40 CFR 262.11 (329 IAC 3-7-2) (HWIMS 100)	✓			
2)	Has the generator submitted biennial reports and exception reports as required? 329 IAC 3-10-2 and 329 IAC 3-10-3 (HWIMS 180/360)	✓			
3)	Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 40 CFR 262.40 (329 IAC 3-10-1) (HWIMS 180)	✓			

DRAW A SITE MAP; identify site of all hazardous waste activity, i.e. accumulation areas, storage areas, treatment areas, etc.

see files

Remember to take photos and document as well as possible all violations!!!

5015S
kaw
12/21/89

Use and Management of Containers

Location of Unit Container Storage Pad

(HWIMS 160/410)

	OK	DF	NI	NA
1) Are containers in good condition?	✓			
2) Are containers compatible with waste in them?	✓			
3) Are containers managed to prevent leaks?	✓			
4) Are containers stored closed?	✓			
5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive).	✓			
6) Are incompatable wastes stored in separate containers? (If not the provisions of 265.17(b) apply)				✓
7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				✓
8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
a. Special handling?	✓			
b. No Smoking signs?	✓			
c. Separation and protection from ignition sources?	✓			
9) Does the container storage area have adequate aisle space (about 2.5 feet)?	✓			
10) Can containers be inspected for leaks or deterioration without moving the containers during the inspection?	✓			

Preparedness and Prevention

11) Security - Do security measures include: (HWIMS 300)				
a. 24- hour surveillance? or	✓			
b. Barrier around facility including controlled entry?	✓			
c. Danger sign(s) at entrance?	✓			
12) Maintenace and Operation of Facility: (HWIMS 140/340, 810 spill)				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?				✓

13) If required, does the facility have the following equipment:
(HWIMS 140/340)

	OK	DF	NI	NA
a. Internal communications or alarm systems?	✓			
b. Telephone or 2-way radios at the scene of operations?	✓			
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic spinklers or water spray equipment available? (Please specify)	✓			
14) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? (HWIMS 140/340)	✓			

Testing and Maintenance of Emergency Equipment

(HWIMS 140/340)

15) a. Has the owner or operator established testing and maintenace procedures for emergency equipment?	✓			
b. Is emergency equipment in operable condition?	✓			
16) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas)	✓			

*TSD's Only

check for comments on back!

5017S
kaw
1/13/89

Use and Management of Containers

1) Are containers in good condition? 40 CFR 265.170 (329 IAC 3-23-1)
2) Are containers compatible with waste? 40 CFR 265.172 (329 IAC 3-23-3)
3) Containers managed to prevent leaks? 40 CFR 265.173(b) (329 IAC 3-23-4)
4) Are containers stored closed? 40 CFR 265.173(d) (329 IAC 3-23-4)
5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). 40 CFR 265.176 (329 IAC 3-23-6)
6) Are incompatable wastes stored in separate containers? (If not provisions of 265.17(b) apply) 40 CFR 265.177(a) (329 IAC 3-23-7)
7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? 40 CFR 265.177(c) (329 IAC 3-23-7)
8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?
   a. Special handling?
   b. No Smoking signs?
   c. Separation and protection from ignition sources? 40 CFR 265.17(a) (329 IAC 3-16-8)
9) Does the container storage area have adequate aisle space (about 2.5 feet)? [329 IAC 3-23-4 (c)]
10) Can containers be inspected for leaks or deterioration without moving the containers [329 IAC 3-23-4 (c)]
11) *Security-Do security measures include:
   a. 24- hour surveillance? or
   b. Barrier around facility including controlled entry?
   c. Danger sign(s) at entrance? 40 CFR 265.14 (329 IAC 3-16-5)
12) Maintenace and Operation of Facility
   a. Is there any evidence of fire, explosion, or release of hazardous waste constituent? 40 CFR 265.31 (329 IAC 3-17-2)
13) If required, does the facility have the following equipment:
   a. Internal communications or alarm systems? 40 CFR 265.32 (a) & 40 CFR 265.34 (a) (329 IAC 3-17-3 & 5)
   b. Telephone or 2-way radios at the scene of operations? 40 CFR 265.32 (b) & 40 CFR 265.34 (b) (329 IAC 3-17-3 & 5)
   c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic spinklers or water spray equipment available? 40 CFR 265.32(c)[329 IAC 3-17-3(c)]
14) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? 40 CFR 265.34(a)[329 IAC 3-17-5]
15) a. Has the owner or operator established testing and maintenace procedures for emergency equipment? 40 CFR 265.33 [329 IAC 3-17-4]
   b. Is emergency equipment in operable condition? 40 CFR 265.33 [329 IAC 3-17-4]
16) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas) 40 CFR 265.35 [329 IAC 3-17-6]

*TSD's Only

Generator Accumulation Appendix
(HWIMS 120)

Location of Unit Container Storage Pad

	OK	DF	NI	NA
1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations? 40 CFR 262.30-262.32 (329 IAC 3-9-1 to 3)				
2) Is the container clearly marked with the start of accumulation date? 40 CFR 262.34 (329 IAC 3-9-5)	✓			
3) Have more than 90 days elapsed since the date inspected in (a)? 40 CFR 262.34 (329 IAC 3-9-5)				✓
4) Do wastes remain in accumulation tanks for more than 90 days? 40 CFR 262.34 (329 IAC 3-9-5				✓
5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"? 40 CFR 262.34 (329 IAC 3-9-5)	✓			

Satellite Accumulation
(HWIMS 120)

1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents? 40 CFR 262.34 (329 IAC 3-9-5 (c))				
2) Are containers in good condition, compatible with the wastes in them and stored closed? 40 CFR 262.34 (329 IAC 3-23-2 & 3 & 4(a))				

0022S
kaw
1/13/89

PREINSPECTION FILES AUDIT
CHECKLIST

DATE: 2/27/91

BY: TFW

COMPANY: American Chemical Services, Inc.

LOCATION: 420 S. Colfax, Griffith

I.D.#: IND/016/360/265

Type of inspection (G)---T---(TSD)---Closure---Complaint---Other(please specify)

A. GENERAL

		YES	NO	NA
1.	FEDERAL NOTIFICATION ON FILE?	X	—	—
2.	FEDERAL PART A ON FILE?	X	—	—
3.	CLOSURE PLAN REVIEWED?	X	—	—
4.	CONTINGENCY PLAN REVIEWED?	X	—	—
5.	BIENNIAL REPORT REVIEWED?	X	—	—
*6.	PART B PERMIT REVIEWED?	X	—	—

*(Note any Special Permit Conditions)

Comments:

B. NOTIFICATION DATA (Notify type, waste codes listed, etc.)

D001, F001, 2, 3 and 5

C. LAND DISPOSAL INFORMATION

1. List Waste and Land Disposal Facility

N/A

D. LIST POSSIBLE WASTE STREAMS NOT LISTED ON BIENNIAL REPORT

N/A

E. LIST WASTE MANAGEMENT PRACTICES WHICH MAY REQUIRE A PERMIT

N/A

F. FEDERAL PART A (Handling Codes), OR PART B PERMIT

	Code	Amount	Unit of Measure
1.	S01	16,500	G - 300 (55) gal. containers
2.	S02	330,700	G
3.	T04	50,000	G Fuels Program
4.			
5.			

Are there any descrepancies regarding multiple Part A submittals?

G. CLOSURE/POST CLOSURE

1. Any Closed Units: If yes, describe:

NO - Former Solids mixing area, pending
all hazardous waste management areas have been shut down,
formal closure is pending - Public notice 11/28/90

H. COMPLIANCE HISTORY

List past two inspections and enforcement actions (CO, NOV, VL, WL)

Date of inspection	Action type	Date of Action
9-29-89	RES	
3-31-91	LOC	

I. LIST UNRESOLVED ENFORCEMENT ACTIONS/VIOLATIONS

N/A

J. BRIEFLY SUMMARIZE PREVIOUS VIOLATIONS. NOTE IF THEY ARE REPEATS.

K. LIST ANY ITEMS UNDER COMPLIANCE SCHEDULES WHICH ARE NOT YET COMPLETED OR NEED FIELD VERIFIED

Closure

L. COMMENTS

12stallation Processes by Process Code (EPA Form 3510-3)

S01	✓ Container storage	T03	___ Incinerator treatment
S02	✓ Tank storage	T04	✓ Other treatment
S03	✓ Waste pile storage	D79	___ Injection well disposal
S04	___ Surface impoundment storage	D80	___ Landfill disposal
T01	___ Tank treatment	D81	___ Land application disposal
T02	___ Surface impoundment treatment	D83	___ Surface impoundment disposal

If Part A process codes are listed above as T04 please describe the process involved below:

Hazardous waste fuel blending

1) Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application. (HWIMS 610)

2) Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

3) Type of Operation, Products Manufactured, Processes Utilized, Size of Operation, Concentrate on processes that produce waste (hazardous or non-hazardous)!

ACS has ceased their hazardous waste activities. The facility must go thru formal closure.

4) If any of the wastes are managed in the manners listed below, please check those areas and utilize the provided appendices.

		YES	NO
A)	Waste Oil Fuel - Appendix A	___	✓
B)	Lead Acid Batteries - Appendix B	___	✓
C)	Hazardous Waste Fuel - Appendix C	___	✓
D)	Precious Metals - Appendix D	___	✓
E)	Use Constituting Disposal - Appendix E	___	✓
F)	Tanks all tanks have been cleaned and are open.	✓	___
G)	Use and Management of Containers	✓	___

	YES	NO
H) Generator Accumulation Appendix	✓	
I) Waste Pile Pending closure	✓	
J) Surface Impoundment		✓
K) Landfill		✓

5) Hazardous Waste Streams/EPA #

Hazardous Waste Streams/EPA #	Source	Rate	Disposition
Clean up waste/"F" & D001	Solids		

6) List all wastes not listed above.

Waste	Process Generating Waste	Rate	Disposition

7) If the company claims a reuse or reclaim exemption please include the following information:

	Waste Type	Generation Rate	How reclaimed & by Who	Quantity stored on Site
A.				
B.				

8) Hazardous Waste

On-Site	Amount	How Stored	Comments
F001 thru 5	39 (Rock)	Container Storage Pad	Removal during
	63 (Land)	" " "	closure
D001	2	" "	

9) Has the capacity of the storage areas listed on the Part A exceeded that allowed? List the type and amount of actual storage capacity overages.
329 IAC 3-38-2 (HWIMS 610)

N/A

10) Indicate any TSD activities which have been omitted from or are not clear on the facility map (for the purpose of determining if expansion has occured)
(40 CFR 270.13 and 329 IAC 3-34-4) (HWIMS 610)

N/A

11) Is the Biennial Report Accurate? N/I

12) Note any non-RCRA Violations (Open Dumping, Dumping in City Sewer Without Pretreatment Program, OSHA, etc.) N/A

13) Additional Comments:

General Facility Standards (paperwork)

		OK	DF	NI	NA
1)	Has the Regional Administrator/Environmental Management Board been notified regarding:				
a.	Receipt of hazardous waste from a foreign source? 40 CFR 265.12(a) (329 IAC 3-16-3) (HWIMS 300)				✓
b.	Facility expansion? 40 CFR 270.72(b) (329 IAC 3-38-3) (HWIMS 610)				✓
c.	Change of owner or operator? 40 CFR 265.12(b) (329 IAC 3-16-3) (HWIMS 300)				✓

2) General Waste Analysis: (HWIMS 310)

a.	Has the owner or operator made a detailed chemical and physical analysis of the waste either through testing of knowledge of the process? 40 CFR 265.13(a)1 (329 IAC 3-16-4)	✓			
b.	Does the owner or operator have a detailed waste analysis plan on file at the facility? 40 CFR 265.13(b) (329 IAC 3-16-4)	✓			
	Does the waste analysis plan contain:				
1.	parameters (and rationale for their choice)	✓			
2.	test methods	✓			
3.	sampling method for representative sample	✓			
4.	frequency of analysis (and rationale)	✓			
5.	off-site only: waste analysis from generators	✓			
6.	Additional waste analysis needed (when a change in waste type or process occurs)				
a.	265.193 (329 IAC 3-24-3) Tanks (see above)	✓			
b.	265.225 (329 IAC 3-25-4) Impoundment (same as above)				✓
c.	265.252 (329 IAC 3-26-3) Waste Pile (same as above)	✓			
d.	265.273 (329 IAC 3-27-3) Land Treatment (same as above)				✓
e.	265.341 (329 IAC 3-29-2) Incinerators (same as above)				✓

		OK	DF	NI	NA
f.	265.375 (329 IAC 3-30-3)Thermal Treatment (same as above)				✓
g.	265.402 (329 IAC 3-31-3)Other Treatment (same as above)				✓

c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? 40 CFR 265.13(c) (329 IAC 3-16-4) ✓

d. Is the waste analysis plan followed? N/A

3) Owner or Operator Inspections: (HWIMS 320)

a. Does the owner or operator inspect the facility for deterioration, malfunctions, operator errors, and discharges of hazardous waste that may affect human health or the environment? 40 CFR 265.15(a) (329 IAC 3-16-6) ✓

b. Does the owner or operator have an inspection schedule at the facility? 40 CFR 265.15(b)2 (329 IAC 3-16-6) ✓

c. If so, does the schedule address the inspection of the following items: 40 CFR 265.15(b)1 (329 IAC 3-16-6)

i. monitoring equipment? ✓

ii. safety and emergency equipment? ✓

iii. security devices (including fences)? ✓

iv. operating and structural equipment (ie. dikes, pumps, etc.)? ✓

v. type of problems to be looked for during the inspection (e.g. leaky fittings, defective pump, etc.)? 40 CFR 265.15(b)(2) (329 IAC 3-16-6) ✓

	OK	DF	NI	NA
vi. inspection frequency (based upon the possible deterioration rate of the equipment)? 40 CFR 265.15(b)(4) (329 IAC 3-16-6)	✓			

vii. Must include:

	OK	DF	NI	NA
1. Weekly container storage? (See 265.174) (329 IAC 3-23-5)	✓			
2. Daily and Weekly Tank Storage? (See 265.194) (329 IAC 3-24-4)	✓			
3. Daily freeboard and weekly dike inspection for surface impoundments? (See 265.226) (329 IAC 3-25-5)				✓
4. Landfills, Thermal treatment, Chemical, Physical, and Biological treatment should be inspected as determined by deterioration rate and daily at loading and unloading areas (where spills are likely) [See 265.15(b)(4) (329 IAC 3-16-6)]				✓
d. Does Owner or Operator follow the written inspection schedule as outlined? 265.15(b)(1) (329 IAC 3-16-6)	✓			
e. Are areas subject to spills inspected daily when in use? 265.15(b)(4) (329 IAC 3-16-6)	✓			
f. Does the owner or operator maintain an inspection log or summary of owner or operator inspections? 40 CFR 265.15(d) (329 IAC 3-16-6)	✓			
g. Does the inspection log contain the following information: 40 CFR 265.15(d) (329 IAC 3-16-6)				
i. the date and time of the inspection?	✓			
ii. the name of the inspector?	✓			

	OK	DF	NI	NA
iii. a notation of the observations made?	✓			
iv. the date and nature of any repairs or remedial actions?	✓			

4) Do personnel training records include: (HWIMS 330)

	OK	DF	NI	NA
a. Job titles for the positions related to HWM 40 CFR 265.16(d)1 (329 IAC 3-16-7)	✓			
b. The name of the employees filling each job title? 40 CFR 265.16(d)(1) (329 IAC 3-16-7)	✓			
c. Job descriptions including the required skills, education, or other qualifications and the duties of the personnel assigned to the position? 40 CFR 265.16(d)2 (329 IAC 3-16-7)	✓			

Check categories for which job titles/descriptions are available (please include the supervisors of each category in that category when reviewing documents).

Emergency coordinator ✓ Training coordinator ✓ Emergency response personnel ✓
Inspectors ___ Material handlers ✓ Container labelers ✓ Manifesters ✓
Recordkeepers ✓

	OK	DF	NI	NA
d. Description of both introductory and continuing training required for each job? 40 CFR 265.16(d)(3) (329 IAC 3-16-7)	✓			

Describe in general the type of training program in use at the facility.

In house classroom and OTJ

	OK	DF	NI	NA
e. Records of training required in (d)? 40 CFR 265.16(d)4 (329 IAC 3-16-7)	✓			

f. Did facility personnel receive the required training including:

	OK	DF	NI	NA
i) classroom or on the job	✓			
ii) within 6 months of hire	✓			
iii) annual review of training?	✓			
g. Are all training records maintained for current personnel and for at least three years for former employees? 40 CFR 265.16(e) [329 IAC 3-16-7(e)]	✓			

CONTINGENCY PLAN AND EMERGENCY PROCEDURES (HWIMS 350)

1) Does the Contingency Plan contain the following information:

	OK	DF	NI	NA
a. The actions facility personnel must take to comply with 265.51 (3-18-2) and 265.56 (3-18-7) in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable).	✓			
A. A description of arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services. 329 IAC 3-18-3	✓			
i. Names, addresses, and phone numbers of all persons qualified to act as emergency coordinators?	✓			
ii. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? 40 CFR 265.52(e) (329 IAC 3-18-3)	✓			

LDR

Gromnicki 6-4-91 GEN/TSD/TRANS

D.B.

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: American Chemical Service, Inc.

U.S. EPA ID No.: IND 016360265

Street: 4200 South Colfax Ave.

City: Griffith State: Ind. Zip: 46319

Telephone: 219/924-4370

RECEIVED JUN 0 5 1991 OFFICE OF [illegible] Waste Managem[illegible] U.S. EPA [illegible]

Inspection Date: 3/8/91 Time: 9:00 (am/pm)

Weather Conditions: Clear, Cold

	Name	Agency/Title	Telephone
Inspectors:	Ted Warner	IDEM/En. Sci.	219/362-6741

Facility Representatives: Jim Murphy
John Murphy

See Appendix B to determine which of the following LDR waste categories the facility manages:

	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents	X		X	X	
F020-F023 and F026-F028					
California List*					
First Third [40 CFR 268.10]					
Second Third [40 CFR 268.11]					
Third Third [40 CFR 268.12]	X		X	X	

* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes: American Chemical Service has ceased their hazardous waste activities. The facility has removed all but 114 drums of "F001" and D001 hazardous waste. The past shipments of hazardous waste have all gone offsite for incineration and use as a hazardous waste derived fuel.

LDR Waste Management: N/A

Summary: The facility will go thru formal closure

Signature: Ted Warner

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(e)]

Yes ___ No ✓ List _____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refactory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes ___ No ✓ List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents: all
2. F020-F023 and F026-F028 dioxin-containing wastes: _____
3. California List Wastes (See Appendix A): _____
4. First Third Wastes [40 CFR 268.10]: _____
5. Second Third Wastes [40 CFR 268.11]: _____
6. Third Third Wastes [40 CFR 268.12]**: D001

*See Appendix B.
** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic [55 FR 22531].

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?*

   Yes ✓ No___

   If no, list below:

Assigned Classification	Correct Classification

*Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments: _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

   Yes ✓ No ___ NA ___

   Comments ___

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

   Yes ___ No ___ NA ✓

   *Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

   If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

   Yes ___ No ___

   Comments ___

C. **Does the facility handle the following wastes (national capacity variances)?**

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

   Yes ___ No ✓ List ___

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

   Yes ___ No ✓ List ___

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

   Yes ___ No ✓ List ___

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35 (b)]

   Yes ___ No ✓ List ___

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

   Yes ___ No ✓ List ___

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

   Yes ✓ No ___ NA ___

   If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
F001	___	✓
F003	___	✓
F005	___	✓
ALL solvent	___	✓

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

   Yes ___ No ___ NA ✓

   If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
___	___	___
___	___	___
___	___	___

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

   a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

      Yes ✓ No ___ NA ___

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
D001			✓

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments_____

b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ✓ No __ NA __

c. Does the generator specify alternative treatment standards for lab packs?*

Yes __ No __ NA ✓

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes?* [40 CFR 268.42(c)(2)]

__ Organometallics: 40 Part 268, Appendix IV constituents
__ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes __ No __ NA ✓

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

a. Liquid hazardous wastes containing PCBs ≥50 ppm

Yes __ No __ NA ✓

If yes, check the appropriate treatability group:

__ 50 to 500 ppm PCBs
__ ≥500 ppm PCBs

b. Listed or characteristic wastes containing ≥1,000 mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥130 mg/l thallium

Yes ___ No ___ NA ✓

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ___ No ___ NA ✓

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ___ No ___ NA ___

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
___	___	__/__/__
___	___	__/__/__
___	___	__/__/__

Comments ___

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ___ No ___ NA ✓

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
___	___	___	___
___	___	___	___
___	___	___	___

Comments ___

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ___ No ✓

If yes, did the generator select the most stringent treatment standards? [40 CFR 268.41(b) and 268.43(b)]

Yes ___ No ___

Comments _____

B. **Waste Analysis**

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ✓ No ___

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ___ No ___

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

a. Knowledge of waste:

Yes ✓ No ___

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

all hazardous waste derived fuel

b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes ___ No ___ NA ✓

*TCLP = Toxicity Characteristic Leaching Procedure (40 CFR Part 268, Appendix I, EPA Test Method 1311)
**See Appendix C for exceptions.
***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ___ No ___ NA X

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ___ No ___ NA X

*PFLT = Paint Filter Liquids Test (Test Method 9095, EPA Publication No. SW-846)

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7 (a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ___ No X (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ___ No ___

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ___ No ___ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

___ Based on a detailed chemical and physical analysis of a representative sample
___ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ___ No ___

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No X (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments _____

b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No X (If No, go to c.)

Check appropriate category:

___ Dilutes to meet treatment standards
___ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

___ Managed in treatment systems regulated under the Clean Water Act
___ Non-toxic* characteristic wastes
___ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No X

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ___ No ___ NA ___

C. **Management**

1. On-Site Management

a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ___ No X

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments _____

b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA X

c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA X

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes X No ___ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
F001-5 & D001	Ash Grove

Does the generator provide a notification to the treatment or storage facilit [40 CFR 268.7(a)(1)]

Yes X No ___ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA X

b. Is a notification sent with each waste shipment?

Yes X No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No X (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ___ No X (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to d.)

b. Are a notification and a certification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	___
___	___
___	___

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 4.)

Complete the following table:

Waste Code	Receiving Facility
___	___
___	___
___	___

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ___ No X (If No, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
___	___
___	___
___	___

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes X No ___

Are copies of relevant tolling argreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ___ No ___ NA X

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ___ No ___ NA X

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

   Yes ___ No X (If No, do not complete this section.)

   List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes

2. Are treatment residuals generated from these units?

   Yes ___ No X

   Comments _____

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

   Yes ___ No ___ NA X

   (If yes, the TSD checklist must also be completed.)

E. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

DBK

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: American Chemical Service, Inc.

U.S. EPA I.D. No.: IND 016 360 265

Street: P.O. Box 190, 420 South Colfax Ave.

City: Griffith State: In. Zip: 46319

Telephone: 219/924-4370

Owner/Operator:

Street: ACS.

City: (SAME) State: Zip:

Telephone:

Inspection Date: 2/22/90 Time: 9:00 AM

Weather Conditions: 42°F, Rain

	Name	Agency/Title	Telephone
Inspector*:	Ted Warner	IDEM, Env. Act. II	317/232-4536

Facility Representative:
* Jim Tarpo
Jim Murphy
* John Murphy

	Generate	Transport	Treat	Store	Dispose
F-Solvent	X		X	X	
Dioxin					
California List					
First Third					
Second Third					

Revised 10-20-89

INSPECTION SUMMARY

Processes That Generate LDR Wastes

Still bottoms from the solvent reclamation operations

LDR Waste Management

See field trip report

Summary

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1. Does the facility handle the following wastes?

   a. F001 through F005 spent solvents

   Yes X No ___ List* F001, 2, 3 and 5

   b. Dioxin-containing Wastes

   Yes ___ No X List* ___

   c. California List Wastes

   Yes ___ No X List* ___

   d. First and Second Third Wastes

   Yes ___ No X List* ___

   * List wastes if room allows or attach Appendix A.

   Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).

2. Does the facility handle the following wastes (national capacity variances)?

   a. F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date -- 11/08/90).

   Yes ___ No X Comments ___

   b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

   Yes ___ No X Comments ___

   c. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date -- 11/08/90).

   Yes ___ No X Comments ___

d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).

Yes ___ No X Comments _____

e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date — 08/08/90).

Yes ___ No X Comments _____

f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date — 06/08/91).

Yes ___ No X Comments _____

LIST OF RESTRICTED WASTES

CODES:
Asterisk (*) = U.S. EPA has established treatment standards or prohibition levels.
No asterisk = Soft hammer wastes.
Underlined = Potential California List applicability.
Bold Print = Final third and newly listed wastes.
NWW = Non-wastewater
WW = Wastewater

	Gen/Trans/Treat/Store/Disp
F001*	X / / X / X /
F002*	X / / X / X /
F003*	X / / X / X /
F004*	/ / / /
F005*	X / / X / X /
F020*	/ / / /
F021*	/ / / /
F022*	/ / / /
F023*	/ / / /
F026*	/ / / /
F027*	/ / / /
F028*	/ / / /
Liquid Hazardous Wastes With:	
As* (500 mg/l)	/ / / /
Cd* (100 mg/l)	/ / / /
Cr VI* (500 mg/l)	/ / / /
Pb* (500 mg/l)	/ / / /
Hg* (20 mg/l)	/ / / /
Ni* (134 mg/l)	/ / / /
Se* (100 mg/l)	/ / / /
Tl* (130 mg/l)	/ / / /
pH* ≤ 2.0	/ / / /
PCBs* ≥ 50 ppm	/ / / /
Hazardous Wastes with:	
HOCs* ≥ 1,000 mg/l	/ / / /
≥ 1,000 mg/kg	/ / / /
F006 (NWW)*	/ / / /
(WW)	/ / / /
F007*	/ / / /
F008*	/ / / /
F009*	/ / / /
F010*	/ / / /

	Gen/Trans/Treat/Store/Disp
F011*	/ / / /
F012*	/ / / /
F019	/ / / /
F024*	/ / / /
K001*	/ / / /
K004	/ / / /
K006 (NWW)*	/ / / /
K007 (NWW)*	/ / / /
K008	/ / / /
K009*	/ / / /
K010*	/ / / /
K011(NWW)*	/ / / /
(WW)	/ / / /
K013(NWW)*	/ / / /
(WW)	/ / / /
K014(NWW)*	/ / / /
(WW)	/ / / /
K015(WW)*	/ / / /
K016*	/ / / /
K017	/ / / /
K018*	/ / / /
K019*	/ / / /
K020*	/ / / /
K021(NWW)*	/ / / /
(WW)	/ / / /
K022(NWW)*	/ / / /
(WW)	/ / / /
K023*	/ / / /
K024*	/ / / /
K025(NWW)*	/ / / /
(WW)	/ / / /
K027*	/ / / /
K028*	/ / / /
K029(NWW)*	/ / / /
(WW)	/ / / /
K030*	/ / / /
K031	/ / / /
K035	/ / / /
K036*	/ / / /

	Gen/Trans/Treat/Store/Disp
K037*	/ / / /
K038*	/ / / /
K039*	/ / / /
K040*	/ / / /
K041	/ / / /
K042	/ / / /
K043*	/ / / /
K044*	/ / / /
K045*	/ / / /
K046 (NWW - nonreactive)*	/ / / /
(NWW - reactive)	/ / / /
(WW)	/ / / /
K047*	/ / / /
K048*	/ / / /
K049*	/ / / /
K050*	/ / / /
K051*	/ / / /
K052*	/ / / /
K060(NWW)*	/ / / /
(WW)	/ / / /
K061 (NWW - low zinc)*	/ / / /
(NWW - high zinc)*	/ / / /
(WW)	/ / / /
K062*	/ / / /
K069	
(NWW - nonCaSO $_4$)*	/ / / /
(NWW - CaSO $_4$)	/ / / /
(WW)	/ / / /
K071*	/ / / /
K073	/ / / /
K083 (WW)	/ / / /
K084	/ / / /
K085	/ / / /

	Gen/Trans/Treat/Store/Disp
K086 (NWW - Sol Wash)*	/ / / /
(WW - Sol Wash)*	/ / / /
(NWW - Sol Sludge)	/ / / /
(WW - Sol Sludge)	/ / / /
(NWW - Caustic/Water	/ / / /
(WW - Caustic/Water)	/ / / /
K087*	/ / / /
K093*	/ / / /
K094*	/ / / /
K095 (NWW)*	/ / / /
(WW)	/ / / /
K096 (NWW)*	/ / / /
(WW)	/ / / /
K097	/ / / /
K098	/ / / /
K099*	/ / / /
K100 (NWW)*	/ / / /
K101 (NWW - low As)*	/ / / /
(NWW - high As)	/ / / /
(WW)*	/ / / /
K102 (NWW - low As)*	/ / / /
(NWW - high As)	/ / / /
(WW)*	/ / / /
K103*	/ / / /
K104*	/ / / /
K105	/ / / /
K106	/ / / /
K113*	/ / / /
K114*	/ / / /
K115*	/ / / /
K116*	/ / / /
P001	/ / / /
P002	/ / / /
P003	/ / / /
P004	/ / / /

	Gen/Trans/Treat/Store/Disp
P005	/ / / /
P007	/ / / /
P008	/ / / /
P010	/ / / /
P011	/ / / /
P012	/ / / /
P013*	/ / / /
P014	/ / / /
P015	/ / / /
P016	/ / / /
P018	/ / / /
P020	/ / / /
P021*	/ / / /
P026	/ / / /
P027	/ / / /
P029*	/ / / /
P030*	/ / / /
P036	/ / / /
P037	/ / / /
P039*	/ / / /
P040*	/ / / /
P041*	/ / / /
P043*	/ / / /
P044*	/ / / /
P048	/ / / /
P049	/ / / /
P050	/ / / /
P054	/ / / /
P057	/ / / /
P058	/ / / /
P059	/ / / /
P060	/ / / /
P062*	/ / / /
P063*	/ / / /
P066	/ / / /
P067	/ / / /
P068	/ / / /
P069	/ / / /
P070	/ / / /
P071*	/ / / /
P072	/ / / /
P074*	/ / / /
P081	/ / / /
P082	/ / / /
P084	/ / / /
P085*	/ / / /

	Gen/Trans/Treat/Store/Disp
P087	/ / / /
P089*	/ / / /
P092	/ / / /
P094*	/ / / /
P097*	/ / / /
P098*	/ / / /
P099*	/ / / /
P102	/ / / /
P104*	/ / / /
P105	/ / / /
P106*	/ / / /
P107	/ / / /
P108	/ / / /
P109*	/ / / /
P110	/ / / /
P111*	/ / / /
P112	/ / / /
P113	/ / / /
P114	/ / / /
P115	/ / / /
P120	/ / / /
P121*	/ / / /
P122	/ / / /
P123	/ / / /
U002	/ / / /
U003	/ / / /
U005	/ / / /
U007	/ / / /
U008	/ / / /
U009	/ / / /
U010	/ / / /
U011	/ / / /
U012	/ / / /
U014	/ / / /
U015	/ / / /
U016	/ / / /
U018	/ / / /
U019	/ / / /
U020	/ / / /
U021	/ / / /
U022	/ / / /
U023	/ / / /
U025	/ / / /
U026	/ / / /

	Gen/Trans/Treat/Store/Disp		Gen/Trans/Treat/Store/Disp		Gen/Trans/Treat/Store/Disp
U028*	/ / / /	U102*	/ / / /	U170	/ / / /
U029	/ / / /	U103	/ / / /	U171	/ / / /
U031	/ / / /	U105	/ / / /	U172	/ / / /
U032	/ / / /	U106	/ / / /	U173	/ / / /
U035	/ / / /	U107*	/ / / /	U174	/ / / /
U036	/ / / /	U108	/ / / /	U176	/ / / /
U037	/ / / /	U109	/ / / /	U177	/ / / /
U041	/ / / /	U110	/ / / /	U178	/ / / /
U043	/ / / /	U111	/ / / /	U179	/ / / /
U044	/ / / /	U114	/ / / /	U180	/ / / /
U046	/ / / /	U115	/ / / /	U185	/ / / /
U047	/ / / /	U116	/ / / /	U188	/ / / /
U049	/ / / /	U119	/ / / /	U189	/ / / /
U050	/ / / /	U122	/ / / /	U190*	/ / / /
U051	/ / / /	U124	/ / / /	U192	/ / / /
U053	/ / / /	U127	/ / / /	U193	/ / / /
U057	/ / / /	U128	/ / / /	U196	/ / / /
U058*	/ / / /	U129	/ / / /	U200	/ / / /
U059	/ / / /	U130	/ / / /	U203	/ / / /
U060	/ / / /	U131	/ / / /	U205	/ / / /
U061	/ / / /	U133	/ / / /	U206	/ / / /
U062	/ / / /	U134	/ / / /	U208	/ / / /
U063	/ / / /	U135	/ / / /	U209	/ / / /
U064	/ / / /	U137	/ / / /	U210	/ / / /
U066	/ / / /	U138	/ / / /	U211	/ / / /
U067	/ / / /	U140	/ / / /	U213	/ / / /
U069*	/ / / /	U142	/ / / /	U214	/ / / /
U070	/ / / /	U143	/ / / /	U215	/ / / /
U073	/ / / /	U144	/ / / /	U216	/ / / /
U074	/ / / /	U146	/ / / /	U217	/ / / /
U077	/ / / /	U147	/ / / /	U218	/ / / /
U078	/ / / /	U149	/ / / /	U219	/ / / /
U080	/ / / /	U150	/ / / /	U220	/ / / /
U083	/ / / /	U151	/ / / /	U221*	/ / / /
U086	/ / / /	U154	/ / / /	U223*	/ / / /
U087*	/ / / /	U155	/ / / /	U226	/ / / /
U088*	/ / / /	U157	/ / / /	U227	/ / / /
U089	/ / / /	U158	/ / / /	U228	/ / / /
U092	/ / / /	U159	/ / / /	U235*	/ / / /
U093	/ / / /	U161	/ / / /	U237	/ / / /
U094	/ / / /	U162	/ / / /	U238	/ / / /
U095	/ / / /	U163	/ / / /	U239	/ / / /
U097	/ / / /	U164	/ / / /	U244	/ / / /
U098	/ / / /	U165	/ / / /	U248	/ / / /
U099	/ / / /	U168	/ / / /	U249	/ / / /
U101	/ / / /	U169	/ / / /		

AC5

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

   Yes X No ___ NA ___

   If yes, check the appropriate treatability group.

   ___ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)

   X All other spent solvent wastes

2. First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

   Yes ___ No ___ NA X

   If yes, list the waste code and check the correct treatability group.

Waste Code	Wastewater*	Non-wastewater

   * Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

   a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

      Yes ___ No ___ NA X

      If yes, specify the method: _____

b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

Yes ___ No ___ NA X

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

___

___

___

c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O?

Yes X No ___ NA ___

4. Does the generator mix restricted wastes with different treatment standards?

Yes ___ No X Comments ___

If yes, did the generator select the most stringent treatment standards (268.41(b), 268.43(b))?

Yes ___ No ___ Comments ___

B. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

- Knowledge of waste Yes X No ___

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.
F001, 2, 3 & 5 – Incoming waste analysis

Was all supporting data retained on-site, [268.7(a)(5)]?

Yes X No ___

- TCLP Yes ___ No X NA ___

  List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

  _____
  _____
  _____

- Total constituent analysis Yes ___ No ___ NA X

  List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

  _____
  _____
  _____

- pH ≤ 2 Yes ___ No ___ NA X

  List the wastes for which pH testing was used.

  _____

- Paint Filter Liquid Test Yes ___ No ___ NA X

  List the wastes for which PFLT was used.

  _____

2. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

   Yes ___ No ___ NA X

C. **Management**

1. **On-Site Management**

   Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

   Yes X No ___ Comments _____

   If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

Yes X No ___ (If no, go to b)

If yes, identify waste code and off-site treatment or storage facilities:

Waste Code	Facilities	Treat/Store

- Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

Yes X No ___

- Does notification contain the following?

EPA Hazardous waste number(s)	Yes X	No ___
Applicable treatment standards and prohibition levels	Yes X	No ___
Manifest number	Yes X	No ___
Waste analysis data, if available	Yes X	No ___

b. Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?

Yes ___ No X (If no, go to c)

If yes, identify waste code and off-site disposal facilities:

Waste Code	Facility

- Does the facility provide notification and certification to the disposal facility [268.7(a)(2)]?

  Yes ___ No ___

- Does notification contain the following?

EPA Hazardous waste number(s)	Yes ___	No ___
Applicable treatment standards and prohibition levels	Yes ___	No ___
Manifest number	Yes ___	No ___
Waste analysis data, if available	Yes ___	No ___
Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)]	Yes ___	No ___

c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

   Yes ___ No X (If no, go to d)

- If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

  Yes ___ No ___

- Does the notification contain the following information?

EPA hazardous waste number	Yes ___	No ___
The corresponding treatment standards and all applicable prohibitions	Yes ___	No ___
Manifest number	Yes ___	No ___
Waste analysis data, if available	Yes ___	No ___
Date the waste is subject to the prohibitions	Yes ___	No ___

d. Does the facility generate any First or Second Third "soft hammer" waste?

   Yes ___ No X (If no, go to 4)

- Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?

(i)	EPA hazardous waste number	Yes ___	No ___
(ii)	Applicable prohibition [268.33(f), 268.34(h)]	Yes ___	No ___
(iii)	Manifest number	Yes ___	No ___
(iv)	Waste analysis data, if available	Yes ___	No ___

3. "Soft Hammer" Demonstrations/Certifications

a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?

Yes ___ No ___

b. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

Yes ___ No ___

c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?

Yes ___ No ___

- If yes, did the generator submit the documentation and certification prior to first shipment?

Yes ___ No ___

d. Does the demonstration contain the following information?

A list of facilities and facility officials contacted?	Yes ___	No ___
Addresses	Yes ___	No ___
Telephone numbers	Yes ___	No ___
Contact dates	Yes ___	No ___
Certification statement	Yes ___	No ___

Attach a copy of the demonstration and certification.

e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes ___ No ___ NA ___

If yes, attach a copy of written discussion.

f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes ___ No ___

Describe the type of treatment and treatment facilities:

Waste Code	Type of Treatment	Treatment Facility

g. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

Yes ___ No ___

h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes ___ No ___ NA ___

4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes X No ___ Comments _____

D. RCRA Corrective Action and CERCLA Response Action Waste

1. Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?

   Yes ___ No X Comments _____

2. Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?

   Yes ___ No ___ NA X Comments _____

E. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

   Yes X No ___

   List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes
	/	Boiler (1)
		Distillation Units (4)

2. Are treatment residuals generated from these units?

   Yes X No ___ Comments Distillation Units

   If yes, the residues are subject to the LDR generator requirements.

3. Are these residuals further treated, stored for greater than 90 days, or disposed on-site?

   Yes X No ___ NA ___ Comments Tanks

   If yes, the TSD checklist must be completed.

ACS

TSD

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264/265.13]?

F-solvent (TCLP)*	Yes X	No ___	NA ___
Dioxin (TCLP)	Yes ___	No ___	NA X
California List (PFLT and/or total constituent analysis)*	Yes ___	No ___	NA X
First & Second Third (TCLP and/or total constituent analysis)	Yes ___	No ___	NA X

* TCLP= Toxicity Characteristic Leaching Procedure (268, App. I)
PFLT= Paint Filter Liquids Test (SW-846)

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

Yes X No ___ Comments _____

a. What date was the waste analysis plan last revised?

1988

b. Are analyses conducted on-site or off-site?

X On-site ____ Off-site

Identify off-site lab: _____

c. Are F-solvent and dioxin containing waste analyzed using TCLP?

Yes ___ No X NA ___

d. Are California List wastes analyzed using the appropriate analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs).

Yes ___ No ___ NA X

e. Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified BDAT* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.

Yes ___ No ___ NA X

* BDAT= best demonstrated available technology

3. Are the operating records, including analyses and quantities, complete [264/265.73]?

Yes X No ___

4. Do operating records contain copies of the notification, certification, and demonstration (if applicable) from the generator? Records must be kept until closure of unit.

Yes X No ___ Comments _____

B. Storage (268.50)

1. Are prohibited wastes* stored on-site?

Yes X No ___ (If no, go to C, Treatment.)

* Prohibited wastes are a subset of restricted wastes, i.e., they are those restricted wastes that are currently ineligible for land disposal [53 FR 31208, August 17, 1988].

2. If yes, identify storage unit.

X Tanks
X Containers
___ Other (Identify inappropriate storage unit(s).

3. Are all containers clearly marked to identify the contents and date(s) entering storage [268.50(a)(2)]?

Yes X No ___ NA ___

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage (264/265.73)?

   Yes X No ___

5. Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?

   Yes X No ___ NA ___

6. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

   Yes X No ___ NA ___

   If yes, do the operating records show that the volume of waste removed from tanks annually equals or is greater than the tank volume?

   Yes X No ___

7. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?

   Yes X No ___ NA ___

8. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect [268.50(c)]?

   Yes ___ No X NA ___

   If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

   Yes ___ No ___ NA ___

   If yes, state how: _____

9. Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored:

   a. In a facility meeting the TSCA criteria in 761.65(b)?

      Yes ___ No ___ NA X

   b. More than one year [268.50(f)]?

      Yes ___ No ___ NA ___

C. **Treatment**

1. Does the facility treat restricted wastes other than in surface impoundments?

   Yes X No ___ (If no, go to D, Surface Impoundments.)

2. Describe the waste codes and treatment processes:

Waste Code	Treatment Processes
	T04 - T63
	T50

3. Was dilution used as a substitute for treatment [268.3]?

   Yes ___ No X Comments ___

4. Does the facility, in accordance with an acceptable waste analysis plan, test the residue from all treatment processes [268.7(b)]?

   Yes X No ___ Comments ___

   Have treatment standards or prohibition levels been met?

   Yes ___ No X Comments ___

5. Does the facility ship any waste or treatment residue to an off-site disposal facility?

   Yes X No ___ NA ___

   If yes, does the treatment facility provide notification and certification to the disposal facility [268.7(b)(4) and (5)]??

   Yes X No ___ (If yes, the Generator portion of the checklist must be completed.)

6. If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements [268.7(a)]?

   Yes X No ___

7. Does the facility treat "soft hammer" wastes?

Yes ___ No X (If no, go to 8.)

a. If yes, is the waste treated in accordance with the generator's certification/demonstration [268.8(c)(1)]?

Yes ___ No ___

b. Did the treatment facility certify that the "soft hammer" waste was treated in accordance with the generator's demonstration, [268.8(c)(1)]?

Yes ___ No ___

8. Does the facility ship any "soft hammer" waste to an off-site treatment, recovery, disposal or storage facility?

Yes ___ No ___ NA X

If yes, does the treatment facility send a copy of the generator's "soft hammer" demonstration and certification to the receiving treatment, recovery, disposal or storage facility along with its treatment certification [268.8(c)(2)]?

Yes ___ No ___ NA ___

Identify waste codes and off-site facilities:

Waste Code	Facility

9. Are notifications, demonstrations, certifications (if applicable), and results of waste analysis prepared by the generators, kept in the operating record until facility closure [264/265.73(b)]?

Yes ___ No ___

D. Surface Impoundments

1. Are prohibited wastes placed in surface impoundments for treatment?

   Yes ___ No X List _____ (If no, go to E, Land Disposal.)

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment?

   Yes ___ No ___

3. Did the facility submit to the Agency, the waste analysis plan, as well as, the certification of compliance with minimum technology and ground-water monitoring requirements?

   Yes ___ No ___

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

   Yes ___ No ___ NA ___

5. Have the Subpart F groundwater monitoring requirements been met?

   Yes ___ No ___ NA ___

6. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

   Yes ___ No ___

   Attach test results.

7. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 40 CFR 268, or where no treatment standards are established for a waste, the applicable prohibition levels?

   Sludge Yes ___ No ___ Waste Code _____

   Supernatant Yes ___ No ___ Waste Code _____

8. Provide the frequency of analyses conducted on treatment residues:

   _____
   _____
   _____

9. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268?

Yes ___ No ___

10. Are sludge residues that exceed the treatment standards and/or prohibition levels removed adequately on an annual basis?

Yes ___ No ___ Comments _____

a. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

Yes ___ No ___

b. Are residues subsequently managed in another surface impoundment?

Yes ___ No ___

c. Are residues treated prior to disposal?

Yes ___ No ___ Comments _____

If yes, are waste residues treated on-site or off-site?

On-site _____ Off-site _____

Identify waste code and treatment method:

Waste Code	Treatment Method

11. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume?

Yes ___ No ___ Comments _____

E. Land Disposal

1. Are restricted and/or prohibited wastes placed in land disposal units such as landfills, surface impoundments, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers?

   Yes ___ No X

   Note: Do not include surface impoundments addressed in D, Surface Impoundments.

   If yes, specify which units and what wastes each unit has received:
   _____
   _____
   _____

2. Does the facility's operating record contain notices, certifications, and "soft hammer" demonstrations from generators/storers/treaters? These records must be maintained until facility closure.

   Yes ___ No ___

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

   Yes ___ No ___

   If yes, at what frequency? _____
   _____
   _____

4. If prohibited wastes that exceed the treatment standards are placed in land disposal units (excluding wastes subject to national capacity variances) [268.30(a)], does the facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance from treatment standards [268.44]?

   Yes ___ No ___

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance or the "soft hammer" provisions?

   Yes ___ No ___ Comments _____

   If yes, have the minimum technology requirements been met for all units receiving such wastes?

   Yes ___ No ___

6. Does the facility have notices [268.7(a)(3)] and records for disposed wastes that are subject to national capacity variances, case-by-case extensions [268.5], no migration petitions [268.6], or a variance from treatment standards?

   Yes ___ No ___ NA ___

7. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

   Yes ___ No ___ NA ___

8. Are restricted wastes placed in underground injection wells?

   Yes ___ No ___ List _____

DBK

TSD - RCRA INSPECTION REPORT

EPA ID # IND 016 360 265 NAME American Chemical Service, Inc.

MAILING ADDRESS: P.O. Box 190
Griffith, Ind. 46319

LOCATION ADDRESS: 420 South Colfax Ave.
Griffith, Ind. 46319

CONTACT: Mr. Jim Tarpo PHONE: 219/924-4370

OWNERSHIP: ACS, Inc. COUNTY: Lake

STATUS CODE: 1 1=Active 3=Dead Mail 4=PCB handler
6=non-handler 2=Obsolete ID # 9=Superfund site
5=Out of business

ACTIVITY: (This should reflect the actual functioning of the facility)

LQG X SQG ____ CEG ____ TRANSPORTER ____ TSD X UI ____

TRANSPORTERS: Air ____ Rail ____ Hwy ____ Water ____ Other ____

HAZARDOUS WASTE FUEL : Gen mktg burner X other mktr ____ burner ____
OFF SPEC USED OIL FUEL : Gen mktg burner ____ other mktr ____ burner ____
SPEC USED OIL FUEL MKTR :
BURNING DEVISE : Util boiler ____ Indus boiler X Indus furn ____

Person(s) interviewed:	Title:	Telephone:
Jim Tarpo	President	
Jim Murphy	Plant Manager	219/924-4370
John Murphy	RCRA Coor.	

Inspector(s):	Agency:	Telephone:
Ted Warner	IDEM (OSHWM)	317/232-4536

Date of inspection: 2-23-90 Time of inspection: 9:30pm

12stallation Processes by Process Code (EPA Form 3510-3)

S01	X	Container storage	T03	___	Incinerator treatment
S02	X	Tank storage	T04	___	Other treatment
S03	___	Waste pile storage	D79	___	Injection well disposal
S04	___	Surface impoundment storage	D80	___	Landfill disposal
T01	___	Tank treatment	D81	___	Land application disposal
T02	___	Surface impoundment treatment	D83	___	Surface impoundment disposal

If Part A process codes are listed above as T04 please describe the process involved below:

_____

_____

1) Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application. (HWIMS 610)

2) Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

3) Type of Operation, Products Manufactured, Processes Utilized, Size of Operation, Concentrate on processes that produce waste (hazardous or non-hazardous)!

ACS manufactures organic chemicals. The facility also blends fuel additives and solvents. ACS H.W. activities include solvent recovery and production of H.W. derived fuel. ACS's processes include filtration, distillation, settling, grinding and blending.

4) If any of the wastes are managed in the manners listed below, please check those areas and utilize the provided appendices.

		YES	NO
A)	Waste Oil Fuel - Appendix A	___	X
B)	Lead Acid Batteries - Appendix B	___	X
C)	Hazardous Waste Fuel - Appendix C	X	___
D)	Precious Metals - Appendix D	___	X
E)	Use Constituting Disposal - Appendix E	___	X
F)	Tanks	X	___
G)	Use and Management of Containers	X	___

	YES	NO
H) Generator Accumulation Appendix	X	
I) Waste Pile closure of mixing area		X
J) Surface Impoundment		X
K) Landfill		X

5) Hazardous Waste Streams/EPA #

Hazardous Waste Streams/EPA #	Source	Rate	Disposition
1. Paint Solids (D001)	Solids	approx 4,000 g/month	Marine Shale Processors, Inc.
2. Filters, drum liners and clothing			
3. Still Bottoms			
4. H.W. derived fuel	Blending		Ash Grove Cement Co.

6) List all wastes not listed above.

Waste	Process Generating Waste	Rate	Disposition
General Refuse	(2)	20 yd^3 Boxes/wk	Wheeler Landfill

7) If the company claims a reuse or reclaim exemption please include the following information:

	Waste Type	Generation Rate	How reclaimed & by Who	Quantity stored on Site
A.				
B.				

8) Hazardous Waste

On-Site	Amount	How Stored	Comments
D001-F001-2-345	201	S01	
	copy of operating record attached		

9) Has the capacity of the storage areas listed on the Part A exceeded that allowed? List the type and amount of actual storage capacity overages.
329 IAC 3-38-2 (HWIMS 610)

no

10) Indicate any TSD activities which have been omitted from or are not clear on the facility map (for the purpose of determining if expansion has occured)
(40 CFR 270.13 and 329 IAC 3-34-4) (HWIMS 610)

N/A

11) Is the Biennial Report Accurate? N/A

12) Note any non-RCRA Violations (Open Dumping, Dumping in City Sewer Without Pretreatment Program, OSHA, etc.) N/A

13) Additional Comments:

see field trip report

General Facility Standards (paperwork)

		OK	DF	NI	NA
1)	Has the Regional Administrator/Environmental Management Board been notified regarding:				
a.	Receipt of hazardous waste from a foreign source? 40 CFR 265.12(a) (329 IAC 3-16-3) (HWIMS 300)				X
b.	Facility expansion? 40 CFR 270.72(b) (329 IAC 3-38-3) (HWIMS 610)				X
c.	Change of owner or operator? 40 CFR 265.12(b) (329 IAC 3-16-3) (HWIMS 300)				X

2) General Waste Analysis: (HWIMS 310)

		OK	DF	NI	NA
a.	Has the owner or operator made a detailed chemical and physical analysis of the waste either through testing of knowledge of the process? 40 CFR 265.13(a)1 (329 IAC 3-16-4)	X			
b.	Does the owner or operator have a detailed waste analysis plan on file at the facility? 40 CFR 265.13(b) (329 IAC 3-16-4)	X			
	Does the waste analysis plan contain:				
	1. parameters (and rationale for their choice)	X			
	2. test methods	X			
	3. sampling method for representative sample	X			
	4. frequency of analysis (and rationale)	X			
	5. off-site only: waste analysis from generators	X			
	6. Additional waste analysis needed (when a change in waste type or process occurs)				
	a. 265.193 (329 IAC 3-24-3)Tanks (see above)	X			
	b. 265.225 (329 IAC 3-25-4)Impoundment (same as above)				X
	c. 265.252 (329 IAC 3-26-3)Waste Pile (same as above)				X
	d. 265.273 (329 IAC 3-27-3)Land Treatment (same as above)				X
	e. 265.341 (329 IAC 3-29-2)Incinerators (same as above)				X

		OK	DF	NI	NA
f.	265.375 (329 IAC 3-30-3)Thermal Treatment (same as above)				X
g.	265.402 (329 IAC 3-31-3)Other Treatment (same as above)				X

c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? 40 CFR 265.13(c) (329 IAC 3-16-4) — X

d. Is the waste analysis plan followed? yes

3) Owner or Operator Inspections: (HWIMS 320)

		OK	DF	NI	NA
a.	Does the owner or operator inspect the facility for deterioration, malfunctions, operator errors, and discharges of hazardous waste that may affect human health or the environment? 40 CFR 265.15(a) (329 IAC 3-16-6)	X			
b.	Does the owner or operator have an inspection schedule at the facility? 40 CFR 265.15(b)2 (329 IAC 3-16-6)	X			
c.	If so, does the schedule address the inspection of the following items: 40 CFR 265.15(b)1 (329 IAC 3-16-6)				
i.	monitoring equipment?	X			
ii.	safety and emergency equipment?	X			
iii.	security devices (including fences)?	X			
iv.	operating and structural equipment (ie. dikes, pumps, etc.)?	X			
v.	type of problems to be looked for during the inspection (e.g. leaky fittings, defective pump, etc.)? 40 CFR 265.15(b)(2) (329 IAC 3-16-6)	X			

	OK	DF	NI	NA
vi. inspection frequency (based upon the possible deterioration rate of the equipment)? 40 CFR 265.15(b)(4) (329 IAC 3-16-6)	X			

vii. Must include:

1. Weekly container storage? (See 265.174) (329 IAC 3-23-5)	X			
2. Daily and Weekly Tank Storage? (See 265.194) (329 IAC 3-24-4)	X			
3. Daily freeboard and weekly dike inspection for surface impoundments? (See 265.226) (329 IAC 3-25-5)				X
4. Landfills, Thermal treatment, Chemical, Physical, and Biological treatment should be inspected as determined by deterioration rate and daily at loading and unloading areas (where spills are likely) [See 265.15(b)(4) (329 IAC 3-16-6)]				X

d. Does Owner or Operator follow the written inspection schedule as outlined? 265.15(b)(1) (329 IAC 3-16-6)	X			
e. Are areas subject to spills inspected daily when in use? 265.15(b)(4) (329 IAC 3-16-6)	X			

f. Does the owner or operator maintain an inspection log or summary of owner or operator inspections? 40 CFR 265.15(d) (329 IAC 3-16-6)	X			
g. Does the inspection log contain the following information: 40 CFR 265.15(d) (329 IAC 3-16-6)				
i. the date and time of the inspection?	X			
ii. the name of the inspector?	X			

	OK	DF	NI	NA
iii. a notation of the observations made?	X			
iv. the date and nature of any repairs or remedial actions?	X			

4) Do personnel training records include: (HWIMS 330)

a. Job titles for the positions related to HWM 40 CFR 265.16(d)1 (329 IAC 3-16-7)	X			
b. The name of the employees filling each job title? 40 CFR 265.16(d)(1) (329 IAC 3-16-7)	X			
c. Job descriptions including the required skills, education, or other qualifications and the duties of the personnel assigned to the position? 40 CFR 265.16(d)2 (329 IAC 3-16-7)	X			

Check categories for which job titles/descriptions are available (please include the supervisors of each category in that category when reviewing documents).

Emergency coordinator X Training coordinator X Emergency response personnel X Inspectors X Material handlers X Container labelers X Manifesters X Recordkeepers X

d. Description of both introductory and continuing training required for each job? 40 CFR 265.16(d)(3) (329 IAC 3-16-7)	X			

Describe in general the type of training program in use at the facility.

In-house training conducted by Mr. Thomas Murphy, subjects covered include required areas of concern.

e. Records of training required in (d)? 40 CFR 265.16(d)4 (329 IAC 3-16-7)	X			

f. Did facility personnel receive the required training including:

	OK	DF	NI	NA
i) classroom or on the job	X			
ii) within 6 months of hire	X			
iii) annual review of training?	X			
g. Are all training records maintained for current personnel and for at least three years for former employees? 40 CFR 265.16(e) [329 IAC 3-16-7(e)]	X			

CONTINGENCY PLAN AND EMERGENCY PROCEDURES (HWIMS 350)

1) Does the Contingency Plan contain the following information:

a. The actions facility personnel must take to comply with 265.51 (3-18-2) and 265.56 (3-18-7) in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable).	X			
A. A description of arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services. 329 IAC 3-18-3	X			
i. Names, addresses, and phone numbers of all persons qualified to act as emergency coordinators?	X			
ii. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? 40 CFR 265.52(e) (329 IAC 3-18-3)	X			

	OK	DF	NI	NA
iii. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must decribe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.) 40 CFR 265.52(f) (329 IAC 3-18-3)	X			
2) Emergency Coordinator:				
a. Is the facility Emergency Coordinator identified? 40 CFR 265.52(d) (329 IAC 3-18-3)	X			
b. Is coordinator familiar with all aspects of site operation and emergency procedures? 40 CFR 265.55 (329 IAC 3-18-6)	X			
c. Does Emergency Coordinator have the authority to carry out the Contingency Plan? 40 CFR 265.55 (329 IAC 3-18-6)	X			

Preparedness and Prevention

1) Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility? 40 CFR 265.37 (329 IAC 3-17-7) (HWIMS 340)	X			
2) Are copies of the Contingency Plan available at the site and local emergency organizations? 40 CFR 265.53 (329 IAC 3-18-4) (HWIMS 350)	X			
3) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56 (329 IAC 3-18-7)? (HWIMS 350)				X

MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING:

		OK	DF	NI	NA
1)	Use of Manifest System: (HWIMS 360)				
	a. Does the facility follow the procedures listed in 265.71 (3-19-2) for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	X			
	b. Are records of past shipments retained for three (3) years? 40 CFR 265.71(b)5 (329 IAC 3-19-2)	X			
2)	Has the facility submitted copies of hazardous waste manifests to the Department within five (5) working days after receiving hazardous waste? (This requirements applies to both Indiana's and other states hazardous waste manifests)?				X
3)	Does the owner or operator meet requirements regarding manifest discrepancies? (Off-site facilities only) 40 CFR 265.72 (329 IAC 3-19-3)				X
4)	Unmanifested Waste Reports: (applies only to Off-site facilities)				
	a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 (3-8-1) without a manifest or shipping paper? 40 CFR 265.76 (329 IAC 3-19-7)	X			
	b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type and date received for each unmanifested hazardous waste shipment.				
	c. Has the facility submitted 8700-13B (unmanifested waste report)?				
5)	Closure/Post Closure				
	a. Is the closure plan available for inspection? 40 CFR 265.112(a) (329 IAC 3-21-3) (HWIMS 390)	X			
	b. Is the post-closure plan available for inspection? (for disposal facilities only) 40 CFR 265.118(a) (329 IAC 3-21-8) (HWIMS 390)				X
	c. Has the closure cost and post closure cost estimate been revised annually to account for inflation. (HWIMS 400)	X			

6) Operating Record: (HWIMS 370)	OK	DF	NI	NA
a. Does owner or operator have a operating record? 40 CFR 265.73(a)	X			
b. Does the owner or operator maintain an operating record that contains the following information?				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR 265 Appendix I (329 IAC 3-32-2)? 40 CFR 265.73(b)(1) (329 IAC 3-19-4)	X			

Summarize how the facility tracks the method and date of TSD activity.

copy attached

ii. The location and quantity of each hazardous waste within the facility? (This information shall be cross referenced to a specific manifest number if the waste was accompanied by manifest.) 40 CFR 265.73(b)(2) (329 IAC 3-19-4)	X			

Summarize how the facility tracks the location and quantity of waste.

copy attached

iii. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross referenced to specific manifest number, if accompanied by a manifest.) 40 CFR 265.73(b)(2) (329 IAC 3-19-4)				X
iv. Records and results of all waste analyses, trial tests, monitoring data, and operating inspections? 40 CFR 265.73(b)(3)(5)(6) (329 IAC 3-19-4)	X			
v. Reports detailing all incidents that required implementation of the Contingency Plan? 40 CFR 265.73(b)(4) (329 IAC 3-19-4)				X
vi. All closure and post closure costs as applicable? 40 CFR 265.73(b)(7) (329 IAC 3-19-4)	X			

GROUNDWATER MONITORING

40 CFR Subpart F

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

		OK	DF	NI	NA
1)	Has the owner or operator of the facility implemented a groundwater monitoring system? 40 CFR 265.90(a) (329 IAC 3-20-1) (HWIMS 380)				X
2)	Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in 265.90(d) (329 IAC 3-20-1)? (HWIMS 380)				X

APPENDIX GN

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Manifest Requirements: (HWIMS 110)	OK	DF	NI	NA
1) Does the operator have copies of the manifest available for review? 40 CFR 262.40 (329 IAC 3-10-1)	X			
2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period			52	
3) Do the manifest forms examined contain the following information. 40 CFR 262.21 (329 IAC 3-8-1)				
a. Manifest document number? EPA ID No. + Unique 5 digit No.? (A sequential number for all manifests before September 20, 1984, and a five digit unique number after September 20, 1984.)	X			
b. Name, mailing address, telephone number, and EPA ID number of generator?	X			
c. Name, telephone number (3-14-3) and EPA ID Number of Transporter(s)?	X			
d. Name, Address, telephone number (3-14-3) and EPA ID Number of designated permitted facility?	X			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	X			
f. The total quantity of waste(s) and the type and number of containers loaded?	X			
g. Required certification?	X			
h. Required signatures?	X			
i. EPA hazardous waste number (3-14-3)?	X			

		OK	DF	NI	NA
4)	For hazardous waste shipments to Indiana facilities (or hazardous waste shipments to states that do not supply manifests) has the generator used the Indiana Hazardous Waste Manifest? 329 IAC 3-8-2				X
5)	Has the generator submitted copies of hazardous waste manifests to the Department within five (5) working days after shipping hazardous waste? (This requirement applies to both Indiana's and other states hazardous waste manifests). 329 IAC 3-8-4	X			

6) Reportable exceptions:
40 CFR 262.42 (329 IAC 3-10-3) (HWIMS 180)

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. none

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) (329 IAC 3-10-3) to the Regional Administrator.

INTERNATIONAL SHIPMENTS: (HWIMS 190)

		OK	DF	NI	NA
1)	Has the installation imported or exported hazardous waste? 40 CFR 262.50 (329 IAC 3-11-1) (If answered Yes, complete the following as applicable.)				X
	a. Exporting hazardous waste; has a generator:				
	i. Notified the administrator in writing?				
	ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
	iii. Met the Manifest requirements?				
	b. Importing hazardous waste; has the generator met the manifest requirements?				

RECORDKEEPING AND REPORTING:

		OK	DF	NI	NA
1)	Has the generator made a proper hazardous waste determination for all solid wastes generated at the facility? 40 CFR 262.11 (329 IAC 3-7-2) (HWIMS 100)	X			
2)	Has the generator submitted biennial reports and exception reports as required? 329 IAC 3-10-2 and 329 IAC 3-10-3 (HWIMS 180/360)	X			
3)	Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 40 CFR 262.40 (329 IAC 3-10-1) (HWIMS 180)	X			

DRAW A SITE MAP; identify site of all hazardous waste activity, i.e. accumulation areas, storage areas, treatment areas, etc.

See files

Remember to take photos and document as well as possible all violations!!!

5015S
kaw
12/21/89

...COMING ...VERATOR	MANIFEST NUMBER	QUANTITY RECEIVED		TRANSPORT	DISPOSITION	PUMPED	DRUMS IN PROCESS
40UBA	034714	~~[illegible]~~	5400	MF	211TCT50	2/20	

DRUMS DRY

2-20-90

DRUM'S PROCESS

F003	Leigh 1-0355935		
F003	Leigh 1- .0355935		
F003	Montgomery 7-0371563		
F003	Sum Process 5-	.0379704	
F003	Bema Film 8-0326581	DRAIN PUMP	DRUMS 70
F003	Federal 9-0330167		
NH	Haviland 5-0556		
F003	Superior 5-0346216		
F001	Regis 1 M/C -0111131		
F001	Regis 1-0111131		
F001	Jensen 1P-0322691		
F001	Milton 1C-0322606	LANSING - 3-0397469	
F001	Blue M 11C-0322689		
F001	Drum Part 7C-0322655		

TRAILERS

MT. DRUMS

TRAILER

IN FIELD

			F001	WELDING	1C-322688		YARD ROCKS - 26		
			F002	LAKE ELEC.	1C-364875				
			F001	MILTON	2C-322605				
			F001	EKCO	6C-174085				
			F001	ASTRO	2C-00019				
			F002	RAPISTAN	1m/c-355892				
			F002	OTTO	1m/c-370255				
			F002	WCI	4B m/c-266999				
			F002	MICROSCAN	6m/c-345012				
			F002	WCI	3B m/c-267000				

03	AUTOSTYLE - ~~1~~ - 0356623	F003,5 DELCO - ~~5~~ 3 ~~4~~ - 0153125	
03	BETTER WAY - 3 - 0346431	F003 DELCO - 2 - 0252803	D001 - BEARD - 6 - 037024 PIPER
01	CHERRY BURRELL - 5 - 0346431	F003,5 DELCO - ~~14~~ 5 ~~6~~ ~~7~~ ~~8~~ - 0252805	0296 - H MILLER - 1 - 0384180
01	ENAMELITE - 1 - 0316035	F003,5 DELCO - ~~3~~ 1 - 0252837	
01	G+W - 10 - 0346455	D001, F003,5 DELCO - ~~8~~ 1 - 0252838	
03	GLASTEC - ~~1~~ - 0330102	F001,3,5 DELCO - ~~8~~ 3 - 0252839	
03	JANCO - 1 - 0309288	F001,3,5 DELCO - ~~8~~ 2 - 0252840	F003,5 STAR - 1 - 033503
05	LESCOA - ~~6~~ 15 - 0248866		
05	MANTA - ~~2~~ 1 - 0264261	F001,3,5 DELCO - ~~8~~ 2 - 0252866	
05	MANTA - ~~2~~ 1 - 0264262	F001,3,5 DELCO - ~~4~~ 2 - 0252867	
01	PETERSON - ~~2~~ 1 - 0346466		
03	PULSE - 8 - 0322982	D001 NAZDAR - 2 - 0356992	
03	SUN CHASER - 7 - 0129725		
01	US CONV. - 2 0135142		
		F003 REGIS - 1A - 0111130	
01,2	H MILLER - 1 - 0164844 m/c		
03	GLASTEC - 1 - 0330104		
3,5	MIDAMERICA - ~~2~~ 1 - 0379870	D001 KELRAN - 1 - 0381089	F003,5 POWER BOX - 1 - 0317993
5	EMBOSOGRAPH - 1 - 0381094		
			D001 PLASTICRAFT - 1 - 0139993
		NH AUTOSTYLE - ~~8~~ - 0356637	F003 TRANSAPE - 1B 0379081
			D001 WESTINGHOUSE - 2 - 0202757
5	JL MANTA - 2 0264270		

WASTE FUEL TANK FARM

202	6500
203	2600
204	1200
205	14300
206	13600
210	20700
211	19800
212	6800

D001
F001
F002
F003
F005

IN FIELD

TRAILER'S
MT DRUM TRAILER

119	MT
118	7800
117	7400
116	8300
122	MT
121	10200
120	MT
1.8	1830
19	1240
126	2800
125	5200
124	MT
123	5300

DRUMS PROCESS

OUTSIDE DRY

F001,F002 - Methylene Chloride
1,1,1 Trichloroethane
Trichoroethylen
Perchloroethylene

F003 - Xylene, Acetone, ethylacetate, methyl isobutyl ketone butyl alcohol

F005 - Toluene, methyl ethyl ketone, isobutanol

D001 - Ignitable FP less than 140° F

DRUMS FOR #20

AMCS.

Generator Accumulation Appendix
(HWIMS 120)

Location of Unit Injection Storage Tanks

	OK	DF	NI	NA
1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations? 40 CFR 262.30-262.32 (329 IAC 3-9-1 to 3)			X	
2) Is the container clearly marked with the start of accumulation date? 40 CFR 262.34 (329 IAC 3-9-5)	X			
3) Have more than 90 days elapsed since the date inspected in (a)? 40 CFR 262.34 (329 IAC 3-9-5)	X			
4) Do wastes remain in accumulation tanks for more than 90 days? 40 CFR 262.34 (329 IAC 3-9-5				X
5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"? 40 CFR 262.34 (329 IAC 3-9-5)	X			

Satellite Accumulation
(HWIMS 120)

1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents? 40 CFR 262.34 (329 IAC 3-9-5 (c))				
2) Are containers in good condition, compatible with the wastes in them and stored closed? 40 CFR 262.34 (329 IAC 3-23-2 & 3 & 4(a))				

0022S
kaw
1/13/89

Generator Accumulation Appendix
(HWIMS 120)

Location of Unit Crude storage

	OK	DF	NI	NA
1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations? 40 CFR 262.30-262.32 (329 IAC 3-9-1 to 3)			X	
2) Is the container clearly marked with the start of accumulation date? 40 CFR 262.34 (329 IAC 3-9-5)	X			
3) Have more than 90 days elapsed since the date inspected in (a)? 40 CFR 262.34 (329 IAC 3-9-5)	X			
4) Do wastes remain in accumulation tanks for more than 90 days? 40 CFR 262.34 (329 IAC 3-9-5				X
5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"? 40 CFR 262.34 (329 IAC 3-9-5)	X			

Satellite Accumulation
(HWIMS 120)

1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents? 40 CFR 262.34 (329 IAC 3-9-5 (c))				
2) Are containers in good condition, compatible with the wastes in them and stored closed? 40 CFR 262.34 (329 IAC 3-23-2 & 3 & 4(a))				

0022S
kaw
1/13/89

Use and Management of Containers

Location of Unit Crude Storage and Injection Storage Tanks

(HWIMS 160/410)

	OK	DF	NI	NA
1) Are containers in good condition?	X			
2) Are containers compatible with waste in them?	X			
3) Are containers managed to prevent leaks?	X			
4) Are containers stored closed?	X			
5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive).	X			
6) Are incompatable wastes stored in separate containers? (If not the provisions of 265.17(b) apply)				X
7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				X
8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
a. Special handling?	X			
b. No Smoking signs?	X			
c. Separation and protection from ignition sources?	X			
9) Does the container storage area have adequate aisle space (about 2.5 feet)?	X			
10) Can containers be inspected for leaks or deterioration without moving the containers during the inspection?	X			

Preparedness and Prevention

11) Security - Do security measures include: (HWIMS 300)				
a. 24- hour surveillance? or	X			
b. Barrier around facility including controlled entry?	X			
c. Danger sign(s) at entrance?	X			
12) Maintenace and Operation of Facility: (HWIMS 140/340, 810 spill)				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	X			

13) If required, does the facility have the following equipment:
(HWIMS 140/340)

	OK	DF	NI	NA
a. Internal communications or alarm systems?	X			
b. Telephone or 2-way radios at the scene of operations?	X			
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic spinklers or water spray equipment available? (Please specify)	X			
14) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? (HWIMS 140/340)	X			

Testing and Maintenance of Emergency Equipment

(HWIMS 140/340)

15) a. Has the owner or operator established testing and maintenace procedures for emergency equipment?	X			
b. Is emergency equipment in operable condition?	X			
16) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas)	X			

12) a. There is evidence of spilled hazardous waste (discoloration and residue) on the concrete pads. The pads do not have any form of diking. These areas are potential hazardous waste release areas.

*TSD's Only

check for comments on back!

5017S
kaw
1/13/89

Use and Management of Containers

1) Are containers in good condition? 40 CFR 265.170 (329 IAC 3-23-1)
2) Are containers compatible with waste? 40 CFR 265.172 (329 IAC 3-23-3)
3) Containers managed to prevent leaks? 40 CFR 265.173(b) (329 IAC 3-23-4)
4) Are containers stored closed? 40 CFR 265.173(d) (329 IAC 3-23-4)
5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). 40 CFR 265.176 (329 IAC 3-23-6)
6) Are incompatable wastes stored in separate containers? (If not provisions of 265.17(b) apply) 40 CFR 265.177(a) (329 IAC 3-23-7)
7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? 40 CFR 265.177(c) (329 IAC 3-23-7)
8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?
   a. Special handling?
   b. No Smoking signs?
   c. Separation and protection from ignition sources?
   40 CFR 265.17(a) (329 IAC 3-16-8)
9) Does the container storage area have adequate aisle space (about 2.5 feet)? [329 IAC 3-23-4 (c)]
10) Can containers be inspected for leaks or deterioration without moving the containers [329 IAC 3-23-4 (c)]
11) *Security-Do security measures include:
   a. 24- hour surveillance? or
   b. Barrier around facility including controlled entry?
   c. Danger sign(s) at entrance? 40 CFR 265.14 (329 IAC 3-16-5)
12) Maintenace and Operation of Facility
   a. Is there any evidence of fire, explosion, or release of hazardous waste constituent? 40 CFR 265.31 (329 IAC 3-17-2)
13) If required, does the facility have the following equipment:
   a. Internal communications or alarm systems?
   40 CFR 265.32 (a) & 40 CFR 265.34 (a) (329 IAC 3-17-3 & 5)
   b. Telephone or 2-way radios at the scene of operations?
   40 CFR 265.32 (b) & 40 CFR 265.34 (b) (329 IAC 3-17-3 & 5)
   c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic spinklers or water spray equipment available? 40 CFR 265.32(c)[329 IAC 3-17-3(c)]
14) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)?
   40 CFR 265.34(a)[329 IAC 3-17-5]
15) a. Has the owner or operator established testing and maintenace procedures for emergency equipment?
   40 CFR 265.33 [329 IAC 3-17-4]
   b. Is emergency equipment in operable condition?
   40 CFR 265.33 [329 IAC 3-17-4]
16) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas) 40 CFR 265.35 [329 IAC 3-17-6]

*TSD's Only

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24)

(HWIMS 170/420)

Integrity Assessment Deadlines

Tank System(s)	Deadline
*(1) New installation	At time of

Tank System ID: _____ Date: _____

_____ _____

(2) Existing Underground-Cannot Enter (interim status and permitted only)	January 12, 1988 (HSWA)

Tank System ID: _____ Date: _____

_____ _____

(3) All remaining Existing Tanks	December 20, 1989

Tank System ID: Injection Storage Tanks (Location C) Date: I.A. provided 1/11/88

202
203
204
205
206
210
211
212

Secondary Containment Deadlines

Tank System(s)	Deadline
*(1) New	Before putting into use

Tank System ID: _____ Date: _____

_____ _____

(2) Existing Underground that cannot be entered (interim status and permitted only)	January 12, 1988 (HSWA)

Tank System ID: _____ Date: _____

_____ _____

* New Tank System = operation or installation commenced after July 14, 1986

(3) Existing that S/T Dioxin Waste — June 20, 1990

Tank System ID: _____ Date: _____

_____ _____

(4) Existing-Age Known/ Documentable — June 20, 1990/when tank reaches 15 years old, whichever is later

"C"

Tank System ID: 202, 203, 204, 205, 206, 210, 211 Date: 6/20/90

212 — 8/1996

(5) Existing-Age Unknown Facility Age greater than 7 years old — June 20, 1990/when facility reaches 15 years old, whichever is later

Tank System ID: _____ Date: _____

_____ _____

(6) Existing-Age Unknown Facililty Age less than 7 years old — June 20, 1996

Tank System ID: _____ Date: _____

_____ _____

Leak Test

All Tank Systems Without Secondary Containment — Leak test annually

Tank System ID: "C" Date: provided

_____ _____

_____ _____

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-5)

General Operating Requirements

	YES	NO	NI	NA
1. Are spill prevention controls (e.g. check valves, dry disconnect couplings) in use? 329 IAC 3-24-5(b)1	X			
2. Are over fill prevention controls (e.g. level sensing devices, high level alarms) present and operational? 329 IAC 3-24-5(b)2	X			
3. Is sufficient freeboard maintained in uncovered tanks to prevent overtopping due to wave or wind action or by precipitation? 329 IAC 3-24-5(b)3				X
4. Has the owner/operator complied with the requirements of 329 IAC 3-24-7 if a leak or spill has occurred in the tank system? (See "leak and spill checklist") 329 IAC 3-24-5(c)				X

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24-6)

General Inspection Requirements

	YES	NO	NI	NA
1. Does the owner/operator inspect, where present overfill spill control equipment, (e.g. waste-feed cutoff systems, bypass systems, and drainage systems) to ensure that it is in good working order, at least once each operating day? 329 IAC 3-24-6(a)1	X			
2. Does the owner/operator inspect the above ground portions of the tank system to detect corrosion or release of waste once each operating day? 329 IAC 3-24-6(a)2	X			
3. Does the owner/operator inspect data gathered from monitoring equipment and leak-detection equipment (e.g. pressure and temperature gauges, monitoring wells) to ensure that tank system is operated according to design once each operating day? 329 IAC 3-24-6(a)3	X			
4. Does the owner/operator inspect the construction materials and the area immediately surrounding the accessible portion of the tank system including secondary containment structure to detect erosion or signs of releases once each operating day? 329 IAC 3-24-6(a)4				X
5. Has the owner/operator confirmed, if present, the proper operation of the cathodic protection system within six (6) months of initial installation? 329 IAC 3-24-6(b)1				

Date of installation _____ Date of inspection _____

6. Does the owner/operator inspect the cathodic protector system annually after installation? 329 IAC 3-24-6(b)1				
7. Does the owner/operator inspect all sources of impressed current at least bi-monthly (every other month)? 329 IAC 3-24-6(b)2				

Method used to inspect impressed-current system _____

8. Does the owner/operator document the above-mentioned inspections (#1-7)? 329 IAC 3-24-6(c)				

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24-2)

Existing Tank Systems Integrity Assessment

Tank System I.D. "C"

Tank Volume: 202/18,000 Tank Type: _____ above, on, in, below ground

203/16,000, 204/17,000, 205/18,000, 206/17,000
210/23,000, 211/23,000, 212/24,000

	YES	NO	NI	NA
1. Does the tank system have secondary containment? 329 IAC 3-24-4		X		

If yes, see Secondary Containment Checklist, If no, continue below

Date when integrity assessment is required 12/29/89

Date when secondary containment is required ~~all page (2) of this form~~

2. Has the facility been granted a variance (exemption) from secondary containment per 329 IAC 3-24-4(g)				X
3. Is a written assessment of tank system integrity on file? 329 IAC 3-24-2(a)	X			
4. If assessment is provided, has it been reviewed and certified by an independent registered, professional engineer? 329 IAC 3-24-2(a)	X			
5. Does the integrity assessment include the following: 329 IAC 3-24-2(b)				
a. Documented age of the tank system.	X			
b. Design standards, if available, which the tank and ancillary equipment were constructed.	X			
c. Hazardous characteristics of the waste that have been or will be handled.	X			
d. Existing corrosion protection measures.	X			
e. Results of leak test, internal inspection, or other tank system integrity exams.	X			

	YES	NO	NI	NA
6. Did the integrity assessment consist of a leak test? 329 IAC 3-24-2(b)5B	X			

Method of leak testing used pressure tests

-or-

7. Did the integrity assessment consist of a certified internal inspection that addresses cracks, leaks, corrosion and erosion? 329 IAC 3-24-2(b)5B				
8. Has a leak test or internal inspection by an independent, qualified, registered professional engineer that addresses cracks, leaks, corrosion, and erosion been done annually? 329 IAC 3-24-4(i)2				

Non-enterable, Unground tanks

N/A

1. Does the assessment consist of a leak test that takes into account the effects of: 329 IAC 3-24-2(b)5A				
a. temperature variations				
b. tank end deflection				
c. vapor pockets				
d. high water table effects				

Method of leak testing used

2. Has a leak test been done annually? 329 IAC 3-24(i)1				

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24-3)

New Tank Systems

Tank Volume: _____ Tank Type: _____
above, on, in, below ground

Tank Construction: _____
fiberglass, reinforced plastic, mild steel, etc.

	YES	NO	NI	NA
1. Has the owner/operator obtained a written assessment reviewed and certified by an independent engineer attesting that the system has sufficient structural integrity and is acceptable for S/T of hazardous waste? 329 IAC 3-24-3(a)				X
2. Does the assessment include the following:				
a. Design standards according to which the tank(s) will be constructed 329 IAC 3-24-3(a)1				
b. Hazardous characteristics of the waste(s) to be handled 329 IAC 3-24-3(a)2				
c. For tank systems in which the external shell of a metal tank or any component is or will be in contact with the soil or water. Has a corrosion expert conducted a corrosion potential assessment? 329 IAC 3-24-3(a)3A				
d. Has a corrosion expert determined the type and degree of external corrosion protection that are needed to ensure the integrity of the tank system?. 329 IAC 3-24-3(a)3B				
e. For tank systems that are affected by vehicular traffic has a determination of design and/or operational measures that will protect the tank system against damage. 329 IAC 3-24-3(a)4				
f. Design considerations to ensure proper tank foundations, anchoring, and prevention of frost heave. 329 IAC 3-24-3(a)5				

	YES	NO	NI	NA
3. Has a qualified installation inspector or independent engineer inspected the tank installation prior to covering, enclosing, or placing a new tank system in use? 329 IAC 3-24-3(b)	___	___	___	___
4. Did the inspection check for the presence of the following:				
weld breaks	___	___	___	___
punctures	___	___	___	___
scrapes of protective coatings	___	___	___	___
cracks	___	___	___	___
corrosion	___	___	___	___
other structural damage, or inadequate construction	___	___	___	___
5. Has the tank system been tested for tightness prior to being covered, enclosed, or put in use? 329 IAC 3-24-3(d)	___	___	___	___
6. Has the owner/operator provided and has a corrosion expert supervised the installation of any field fabricated corrosion protection (e.g. cathodic protection)? 329 IAC 3-24-3(f)	___	___	___	___
7. Has the owner/operator obtained and kept on file written statements by those persons requested to certify the design and supervise the installation of the tank system in accordance with 329 IAC 3-24-3(b thru f)? 329 IAC 3-24-3(g)	___	___	___	___
8. Do these written statements include the certification statement as required by 329 IAC 3-34-2(d)?	___	___	___	___

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-4)

Secondary Containment

Secondary Containment consist of the following:

(circle one) liner, vault, double-walled component, an equivalent device as approved

Type of leak detection equipment employed. not provided

	YES	NO	NI	NA
*1. Is the secondary containment system constructed of or lined with materials that are compatible with the waste and have sufficient strength and thickness to prevent failure? 329 IAC 3-24-4(c)1			X	
*2. Is the secondary containment system placed on a foundation or base capable of providing support? 329 IAC 3-24-4(c)2			X	
3. Is the secondary containment system provided with a leak detection system that will detect the failure of either the primary or secondary containment structure within 24 hours? 329 IAC 3-24-4(c)3				
4. Is the secondary containment system sloped or otherwise designed or operated to drain and remove liquids within 24 hours? 329 IAC 3-24-(c)4				
*5. Will the secondary containment (liners and vaults) contain 100% of the design capacity of the largest tank in its boundry plus a 25 year - 24 hour rainfall? 329 IAC 3-24-4(e)1A and 2A			X	
6. Is the secondary containment system designed or operated to prevent run-on or infiltration of precipitation into the system unless the collection system has sufficient excess capacity to contain run-on or infiltration. 329 IAC 3-24-4(e)1B and 2B				
7. External Liner Systems				
a. Does the liner cover all the surrounding earth likely to come into contact with wastes, including berms and dikes? 329 IAC 3-24-4(e)1D				
b. Whether clay, polymeric, or concrete, is the liner free of cracks, gaps, tears, rips, etc.? 329 IAC 3-24-4(e)1C				

* Item could not be field verified, requires review by technical staff

	YES	NO	NI	NA
8. Vault Systems				
a. Is the vault constructed with chemically resistant water stops at all joints? 329 IAC 3-24-4(e)2C	___	___	___	___
b. Does all concrete, including sumps, have an impermeable coating or lining? 329 IAC 3-24-4(e)2D	___	___	___	___
c. Is there deterioration of protective coatings or liners such as discoloration and film lifting or cracks? 329 IAC 3-24-4(e)2D	___	___	___	___
d. Is the vault provided with a means to protect against the formation of and ignition of vapors within the vault if ignitable or reactive waste is treated or stored? 329 IAC 3-24-4(e)2E	___	___	___	___
9. Double-walled Tanks				
a. If metal, is there appropriate corrosion protection for the inner and outer shell? 329 IAC 3-24-4(e)3B	___	___	___	___
b. Does the double-walled tank have an operational, built-in continuous leak-detection system capable of detecting a release within 24 hours or at the earliest practical time? 329 IAC 3-24-4(e)3C	___	___	___	___
10. Ancillary Equipment Exempt from Secondary Containment				
a. Is all above ground, straight piping that is not covered by secondary containment inspected daily? 329 IAC 3-4(f)1	___	___	___	___
b. Are all welded flanges, welded joints, and welded connections inspected for leaks daily? 329 IAC 3-24-4(f)2	___	___	___	___
c. Are all sealless of magnetic coupling pumps visually inspected for leaks daily? 329 IAC 3-24-4(f)3	___	___	___	___
d. Are all pressurized, above ground piping systems with automatic shutoff devices visually inspected daily? 329 IAC 3-24-4(f)4	___	___	___	___

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-4.7)

Response to Leaks and Spills

	YES	NO	NI	NA
1. In the event of a spill or leak did the owner/operator immediately remove the tank system from service and inspect the system for the cause of the release. 329 IAC 3-24-4-7(a)1				X
2. Was waste removed from leaking tank system and secondary containment within 24 hours of being detected, or at the earliest practicable time? 329 IAC 3-24-7(a)2				
3. Were visible releases to the environment contained and immediately removed? 329 IAC 3-24-7(a)3				
4. In the event of a release, to the environment, did the owner/operator report the incident to the Commissioner within 24 hours? 329 IAC 3-24-7(a)4A				
5. Did the owner/operator submit a written report to the Commissioner within 30 days of a release to the environment with the required information? 329 IAC 3-24-7(a)4C				
6. In the event of a release, has the tank system or secondary containment system been repaired or closed as required? 329 IAC 3-24-7(a)5				
7. Were any extensive repairs to the tank system or secondary containment system certified by an independent, qualified, registered engineer. 329 IAC 3-24-7(a)6				

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-9and 10)

Ignitable or Reactive Waste

	YES	NO	NI	NA
1. Has the waste been treated, mixed or otherwise rendered nonreactive or not ignitable? 329 IAC 3-24-9(a)1				X
-or-				
2. Is the tank protected from conditions that may cause it to ignite (use of spark proof tools) or protected from contact with materials that may cause it to react? 329 IAC 3-24-9(a)2	X			
3. Is the required National Fire Protection Association distance between waste tanks (ignitable waste) and public ways and adjoining properties maintained? 329 IAC 3-24-9(b)	X			
4. Has an appropriate method of tank system decontamination been selected for tanks which previously held incompatable waste? 329 IAC 3-24-10(a and b)				X

TANK SYSTEMS

Preparedness and Prevention

	YES	NO	NI	NA
1. Security - Do security measures include: (HWIMS 300)				
a. 24-hour surveillance? or				
b. Barrier around facility including controlled entry?	X			
c. Danger sign(s) at entrance?	X			
2. Maintenance and Operation of Facility (HWIMS 140/340, 810 spill)				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?				X
3. If required, does the facility have the following equipment? (HWIMS 140/340)				
a. Internal communications or alarm systems?	X			
b. Telephone or 2-way radios at the scene of operations?	X			
c. Portable fire extinquishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify.)	X			
4. Whenever waste is being handled, do all personnel have immediate access to an alarm or communication device (through another employee if always available)? (HWIMS 140/340)	X			

Testing and Maintenance of Emergency Equipment

(HWIMS 140/340)

5. a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	X			
b. Is emergency equipment in operable condition?	X			
6. Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas.)	X			

5041S
kaw
4/6/89

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24)

(HWIMS 170/420)

Integrity Assessment Deadlines

Tank System(s)	Deadline
*(1) New installation	At time of

Tank System ID: _____ Date: _____

_____ _____

(2) Existing Underground- Cannot Enter (interim status and permitted only) — January 12, 1988 (HSWA)

Tank System ID: _____ Date: _____

_____ _____

(3) All remaining Existing Tanks — December 20, 1989

Tank System ID: Crude Storage Location B and 1002 - Date: 1/11/88

_____

	#
1A	121
1B	122
116	123
117	124
118	125
119	126
120	

Secondary Containment Deadlines

Tank System(s)	Deadline
*(1) New	Before putting into use

Tank System ID: _____ Date: _____

_____ _____

(2) Existing Underground that cannot be entered (interim status and permitted only) — January 12, 1988 (HSWA)

Tank System ID: _____ Date: _____

_____ _____

* New Tank System = operation or installation commenced after July 14, 1986

(3) Existing that S/T Dioxin Waste — June 20, 1990

Tank System ID: _____ Date: _____

_____ _____

(4) Existing-Age Known/ Documentable — June 20, 1990/when tank reaches 15 years old, whichever is later

1A, 1B, 116, 117, 118, 119, 123, 124, 125, 126 } 6/24/90

Tank System ID: _____ Date: _____

120, 121, 122 - 7/96 _____

1002 - 1992

(5) Existing-Age Unknown Facility Age greater than 7 years old — June 20, 1990/when facility reaches 15 years old, whichever is later

Tank System ID: _____ Date: _____

_____ _____

(6) Existing-Age Unknown Facililty Age less than 7 years old — June 20, 1996

Tank System ID: _____ Date: _____

_____ _____

Leak Test

All Tank Systems Without Secondary Containment — Leak test annually

Tank System ID: "B" Date: each year

1002 _____

_____ _____

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-5)

General Operating Requirements

	YES	NO	NI	NA
1. Are spill prevention controls (e.g. check valves, dry disconnect couplings) in use? 329 IAC 3-24-5(b)1	X			
2. Are over fill prevention controls (e.g. level sensing devices, high level alarms) present and operational? 329 IAC 3-24-5(b)2	X			
3. Is sufficient freeboard maintained in uncovered tanks to prevent overtopping due to wave or wind action or by precipitation? 329 IAC 3-24-5(b)3				X
4. Has the owner/operator complied with the requirements of 329 IAC 3-24-7 if a leak or spill has occurred in the tank system? (See "leak and spill checklist") 329 IAC 3-24-5(c)				X

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24-6)

General Inspection Requirements

	YES	NO	NI	NA
1. Does the owner/operator inspect, where present overfill spill control equipment, (e.g. waste-feed cutoff systems, bypass systems, and drainage systems) to ensure that it is in good working order, at least once each operating day? 329 IAC 3-24-6(a)1	X			
2. Does the owner/operator inspect the above ground portions of the tank system to detect corrosion or release of waste once each operating day? 329 IAC 3-24-6(a)2	X			
3. Does the owner/operator inspect data gathered from monitoring equipment and leak-detection equipment (e.g. pressure and temperature gauges, monitoring wells) to ensure that tank system is operated according to design once each operating day? 329 IAC 3-24-6(a)3				X
4. Does the owner/operator inspect the construction materials and the area immediately surrounding the accessible portion of the tank system including secondary containment structure to detect erosion or signs of releases once each operating day? 329 IAC 3-24-6(a)4				
5. Has the owner/operator confirmed, if present, the proper operation of the cathodic protection system within six (6) months of initial installation? 329 IAC 3-24-6(b)1				

Date of installation _____ Date of inspection _____

6. Does the owner/operator inspect the cathodic protector system annually after installation? 329 IAC 3-24-6(b)1				
7. Does the owner/operator inspect all sources of impressed current at least bi-monthly (every other month)? 329 IAC 3-24-6(b)2				

Method used to inspect impressed-current system _____

8. Does the owner/operator document the above-mentioned inspections (#1-7)? 329 IAC 3-24-6(c)				

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24-2)

Existing Tank Systems Integrity Assessment

Tank System I.D. "B"

1A - 2750
1B - 2750
116 - 10,900
117 - 10,800
118 - 10,900
119 - 10,800
120 - 6,000
121 - 10,500
122 - 10,500
123 - 19,500
124 - 19,500
1002 - 11,000

Tank Volume: _____ Tank Type: above
above, on, in, below ground

		YES	NO	NI	NA
1.	Does the tank system have secondary containment? 329 IAC 3-24-4				
	If yes, see Secondary Containment Checklist, If no, continue below				
	Date when integrity assessment is required 12/29/89				
	Date when secondary containment is required page 2 of this form				
2.	Has the facility been granted a variance (exemption) from secondary containment per 329 IAC 3-24-4(g)				X
3.	Is a written assessment of tank system integrity on file? 329 IAC 3-24-2(a)	X			
4.	If assessment is provided, has it been reviewed and certified by an independent registered, professional engineer? 329 IAC 3-24-2(a)	X			
5.	Does the integrity assessment include the following: 329 IAC 3-24-2(b)				
a.	Documented age of the tank system.	X			
b.	Design standards, if available, which the tank and ancillary equipment were constructed.	X			
c.	Hazardous characteristics of the waste that have been or will be handled.	X			
d.	Existing corrosion protection measures.	X			
e.	Results of leak test, internal inspection, or other tank system integrity exams.	X			

	YES	NO	NI	NA
6. Did the integrity assessment consist of a leak test? 329 IAC 3-24-2(b)5B	___	___	___	___

Method of leak testing used pressure tests

-or-

7. Did the integrity assessment consist of a certified internal inspection that addresses cracks, leaks, corrosion and erosion? 329 IAC 3-24-2(b)5B	___	___	___	___
8. Has a leak test or internal inspection by an independent, qualified, registered professional engineer that addresses cracks, leaks, corrosion, and erosion been done annually? 329 IAC 3-24-4(i)2	___	___	___	___

Non-enterable, Unground tanks

1. Does the assessment consist of a leak test that takes into account the effects of: 329 IAC 3-24-2(b)5A				
a. temperature variations	___	___	___	X
b. tank end deflection	___	___	___	___
c. vapor pockets	___	___	___	___
d. high water table effects	___	___	___	___

Method of leak testing used _____

2. Has a leak test been done annually? 329 IAC 3-24(i)1	___	___	___	___

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24-3)

New Tank Systems

N/A

Tank Volume: _____ Tank Type: _____
above, on, in, below ground

Tank Construction: _____
fiberglass, reinforced plastic, mild steel, etc.

	YES	NO	NI	NA
1. Has the owner/operator obtained a written assessment reviewed and certified by an independent engineer attesting that the system has sufficient structural integrity and is acceptable for S/T of hazardous waste? 329 IAC 3-24-3(a)	___	___	___	___
2. Does the assessment include the following:				
a. Design standards according to which the tank(s) will be constructed 329 IAC 3-24-3(a)1	___	___	___	___
b. Hazardous characteristics of the waste(s) to be handled 329 IAC 3-24-3(a)2	___	___	___	___
c. For tank systems in which the external shell of a metal tank or any component is or will be in contact with the soil or water. Has a corrosion expert conducted a corrosion potential assessment? 329 IAC 3-24-3(a)3A	___	___	___	___
d. Has a corrosion expert determined the type and degree of external corrosion protection that are needed to ensure the integrity of the tank system?. 329 IAC 3-24-3(a)3B	___	___	___	___
e. For tank systems that are affected by vehicular traffic has a determination of design and/or operational measures that will protect the tank system against damage. 329 IAC 3-24-3(a)4	___	___	___	___
f. Design considerations to ensure proper tank foundations, anchoring, and prevention of frost heave. 329 IAC 3-24-3(a)5	___	___	___	___

	YES	NO	NI	NA
3. Has a qualified installation inspector or independent engineer inspected the tank installation prior to covering, enclosing, or placing a new tank system in use? 329 IAC 3-24-3(b)	___	___	___	___
4. Did the inspection check for the presence of the following:				
weld breaks	___	___	___	___
punctures	___	___	___	___
scrapes of protective coatings	___	___	___	___
cracks	___	___	___	___
corrosion	___	___	___	___
other structural damage, or inadequate construction	___	___	___	___
5. Has the tank system been tested for tightness prior to being covered, enclosed, or put in use? 329 IAC 3-24-3(d)	___	___	___	___
6. Has the owner/operator provided and has a corrosion expert supervised the installation of any field fabricated corrosion protection (e.g. cathodic protection)? 329 IAC 3-24-3(f)	___	___	___	___
7. Has the owner/operator obtained and kept on file written statements by those persons requested to certify the design and supervise the installation of the tank system in accordance with 329 IAC 3-24-3(b thru f)? 329 IAC 3-24-3(g)	___	___	___	___
8. Do these written statements include the certification statement as required by 329 IAC 3-34-2(d)?	___	___	___	___

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-4)

Secondary Containment

Secondary Containment consist of the following:

(circle one) liner, vault, double-walled component, an equivalent device as approved

Type of leak detection equipment employed. not provided

	YES	NO	NI	NA
*1. Is the secondary containment system constructed of or lined with materials that are compatible with the waste and have sufficient strength and thickness to prevent failure? 329 IAC 3-24-4(c)1			X	
*2. Is the secondary containment system placed on a foundation or base capable of providing support? 329 IAC 3-24-4(c)2			X	
3. Is the secondary containment system provided with a leak detection system that will detect the failure of either the primary or secondary containment structure within 24 hours? 329 IAC 3-24-4(c)3				
4. Is the secondary containment system sloped or otherwise designed or operated to drain and remove liquids within 24 hours? 329 IAC 3-24-(c)4				
*5. Will the secondary containment (liners and vaults) contain 100% of the design capacity of the largest tank in its boundry plus a 25 year - 24 hour rainfall? 329 IAC 3-24-4(e)1A and 2A			X	
6. Is the secondary containment system designed or operated to prevent run-on or infiltration of precipitation into the system unless the collection system has sufficient excess capacity to contain run-on or infiltration. 329 IAC 3-24-4(e)1B and 2B				
7. External Liner Systems				
a. Does the liner cover all the surrounding earth likely to come into contact with wastes, including berms and dikes? 329 IAC 3-24-4(e)1D				
b. Whether clay, polymeric, or concrete, is the liner free of cracks, gaps, tears, rips, etc.? 329 IAC 3-24-4(e)1C				

* Item could not be field verified, requires review by technical staff

	YES	NO	NI	NA
8. Vault Systems				
a. Is the vault constructed with chemically resistant water stops at all joints? 329 IAC 3-24-4(e)2C	___	___	___	___
b. Does all concrete, including sumps, have an impermeable coating or lining? 329 IAC 3-24-4(e)2D	___	___	___	___
c. Is there deterioration of protective coatings or liners such as discoloration and film lifting or cracks? 329 IAC 3-24-4(e)2D	___	___	___	___
d. Is the vault provided with a means to protect against the formation of and ignition of vapors within the vault if ignitable or reactive waste is treated or stored? 329 IAC 3-24-4(e)2E	___	___	___	___
9. Double-walled Tanks				
a. If metal, is there appropriate corrosion protection for the inner and outer shell? 329 IAC 3-24-4(e)3B	___	___	___	___
b. Does the double-walled tank have an operational, built-in continuous leak-detection system capable of detecting a release within 24 hours or at the earliest practical time? 329 IAC 3-24-4(e)3C	___	___	___	___
10. Ancillary Equipment Exempt from Secondary Containment				
a. Is all above ground, straight piping that is not covered by secondary containment inspected daily? 329 IAC 3-4(f)1	___	___	___	___
b. Are all welded flanges, welded joints, and welded connections inspected for leaks daily? 329 IAC 3-24-4(f)2	___	___	___	___
c. Are all sealless of magnetic coupling pumps visually inspected for leaks daily? 329 IAC 3-24-4(f)3	___	___	___	___
d. Are all pressurized, above ground piping systems with automatic shutoff devices visually inspected daily? 329 IAC 3-24-4(f)4	___	___	___	___

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-4.7)

Response to Leaks and Spills

	YES	NO	NI	NA
1. In the event of a spill or leak did the owner/operator immediately remove the tank system from service and inspect the system for the cause of the release. 329 IAC 3-24-4-7(a)1				X
2. Was waste removed from leaking tank system and secondary containment within 24 hours of being detected, or at the earliest practicable time? 329 IAC 3-24-7(a)2				
3. Were visible releases to the environment contained and immediately removed? 329 IAC 3-24-7(a)3				
4. In the event of a release, to the environment, did the owner/operator report the incident to the Commissioner within 24 hours? 329 IAC 3-24-7(a)4A				
5. Did the owner/operator submit a written report to the Commissioner within 30 days of a release to the environment with the required information? 329 IAC 3-24-7(a)4C				
6. In the event of a release, has the tank system or secondary containment system been repaired or closed as required? 329 IAC 3-24-7(a)5				
7. Were any extensive repairs to the tank system or secondary containment system certified by an independent, qualified, registered engineer. 329 IAC 3-24-7(a)6				

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-9and 10)

Ignitable or Reactive Waste

	YES	NO	NI	NA
1. Has the waste been treated, mixed or otherwise rendered nonreactive or not ignitable? 329 IAC 3-24-9(a)1				X
-or-				
2. Is the tank protected from conditions that may cause it to ignite (use of spark proof tools) or protected from contact with materials that may cause it to react? 329 IAC 3-24-9(a)2	X			
3. Is the required National Fire Protection Association distance between waste tanks (ignitable waste) and public ways and adjoining properties maintained? 329 IAC 3-24-9(b)	X			
4. Has an appropriate method of tank system decontamination been selected for tanks which previously held incompatable waste? 329 IAC 3-24-10(a and b)				X

TANK SYSTEMS

Preparedness and Prevention

	YES	NO	NI	NA
1. Security - Do security measures include: (HWIMS 300)				
a. 24-hour surveillance? or				
b. Barrier around facility including controlled entry?	X			
c. Danger sign(s) at entrance?	X			
2. Maintenance and Operation of Facility (HWIMS 140/340, 810 spill)				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?				X
3. If required, does the facility have the following equipment? (HWIMS 140/340)				
a. Internal communications or alarm systems?	X			
b. Telephone or 2-way radios at the scene of operations?	X			
c. Portable fire extinquishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify.)	X			
4. Whenever waste is being handled, do all personnel have immediate access to an alarm or communication device (through another employee if always available)? (HWIMS 140/340)	X			

Testing and Maintenance of Emergency Equipment

(HWIMS 140/340)

	YES	NO	NI	NA
5. a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	X			
b. Is emergency equipment in operable condition?	X			
6. Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas.)	X			

5041S
kaw
4/6/89

PREINSPECTION FILES AUDIT
CHECKLIST

DATE: 2/20/90

BY: TFW

COMPANY: American Chemical Service, Inc.

LOCATION: 420 S. Colfax, Griffith

I.D.#: IND/016/360/265

Type of inspection: G---T---TSD---Closure---Complaint---Other(please specify)

A. GENERAL

		YES	NO	NA
1.	FEDERAL NOTIFICATION ON FILE?	X	—	—
2.	FEDERAL PART A ON FILE?	X	—	—
3.	CLOSURE PLAN REVIEWED?	X	—	—
4.	CONTINGENCY PLAN REVIEWED?	X	—	—
5.	BIENNIAL REPORT REVIEWED?	X	—	—
*6.	PART B PERMIT REVIEWED?	X	—	—
	*(Note any Special Permit Conditions)			

Comments:

B. NOTIFICATION DATA (Notify type, waste codes listed, etc.)

D001, F001, 2, 3 and 5

C. LAND DISPOSAL INFORMATION

1. List Waste and Land Disposal Facility

N/A

D. LIST POSSIBLE WASTE STREAMS NOT LISTED ON BIENNIAL REPORT

N/A

E. LIST WASTE MANAGEMENT PRACTICES WHICH MAY REQUIRE A PERMIT

N/A

F. FEDERAL PART A (Handling Codes), OR PART B PERMIT

	Code	Amount	Unit of Measure
1.	S01	16,500	G - 300 (55) gal. containers
2.	S02	320,700	G
3.	T04	50,000	G Fuels program
4.			
5.			

Are there any descrepancies regarding multiple Part A submittals?

G. CLOSURE/POST CLOSURE

1. Any Closed Units: If yes, describe:

No. waste pile area is pending

H. COMPLIANCE HISTORY

List past two inspections and enforcement actions (CO, NOV, VL, WL)

Date of inspection	Action type	Date of Action
3-31-89	RES	
9-29-89	RES	

I. LIST UNRESOLVED ENFORCEMENT ACTIONS/VIOLATIONS

9-29-89

J. BRIEFLY SUMMARIZE PREVIOUS VIOLATIONS. NOTE IF THEY ARE REPEATS.

Overage of containers in storage area. (R)

K. LIST ANY ITEMS UNDER COMPLIANCE SCHEDULES WHICH ARE NOT YET COMPLETED OR NEED FIELD VERIFIED

L. COMMENTS

9-18

TSD - RCRA INSPECTION REPORT

EPA ID # IND016360265 NAME American Chemical Services, Inc

MAILING ADDRESS: P.O. Box 190
Griffith, Ind 46319

LOCATION ADDRESS: 420 South Colfax Ave.
Griffith, Ind. 46319

CONTACT: Jim Tarpo PHONE: 219/924-4370

OWNERSHIP: American Chemical Services, Inc. COUNTY: Lake

STATUS CODE: 1 1=Active 3=Dead Mail 4=PCB handler
6=non-handler 2=Obsolete ID # 9=Superfund site
5=Out of business

ACTIVITY: (This should reflect the actual functioning of the facility)

LQG ✓ SQG ____ CEG ____ TRANSPORTER ____ TSD ✓ UI ____

TRANSPORTERS: Air ____ Rail ____ Hwy ____ Water ____ Other ____

HAZARDOUS WASTE FUEL : Gen mktg burner X other mktr ____ burner ____
OFF SPEC USED OIL FUEL : Gen mktg burner ____ other mktr ____ burner ____
SPEC USED OIL FUEL MKTR :
BURNING DEVISE : Util boiler ____ Indus boiler X Indus furn ____

Person(s) interviewed:	Title:	Telephone:
Jim Tarpo	President	219-924-4370
Jim Murphy	Plant Manager	"

Inspector(s):	Agency:	Telephone:
Ted Warner	IDEM	317-232-4578

Date of inspection: 9-29-89 Time of inspection: 10:07 AM

Installation Processes by Process Code (EPA Form 3510-3)

S01 ✓ Container storage
S02 ✓ Tank storage
S03 ✓ Waste pile storage
S04 ___ Surface impoundment storage
T01 ___ Tank treatment
T02 ___ Surface impoundment treatment
T03 ___ Incinerator treatment
T04 ✓ Other treatment
D79 ___ Injection well disposal
D80 ___ Landfill disposal
D81 ___ Land application disposal
D83 ___ Surface impoundment disposal

If Part A process codes are listed above as T04 please describe the process involved below:

S03 not on ACS Part A. This area was formerly used as a solids mixing area. Area to be closed.

1) Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application. (HWIMS 610)

2) Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

3) Type of Operation, Products Manufactured, Processes Utilized, Size of Operation, Concentrate on processes that produce waste (hazardous or non-hazardous):

ACS manufactures organic chemicals. The facility also blends fuel additives and solvents. ACS hazardous waste activities include recovery and the production of hazardous waste derived fuel. ACS's processes include filtration, distillation, settling, grinding and blending.

4) If any of the wastes are managed in the manners listed below, please check those areas and utilize the provided appendices.

		YES	NO
A)	Waste Oil Fuel - Appendix A	___	X
B)	Lead Acid Batteries - Appendix B	___	X
C)	Hazardous Waste Fuel - Appendix C	X	___
D)	Precious Metals - Appendix D	___	X
E)	Use Constituting Disposal - Appendix E	___	X
F)	Tanks	X	___
G)	Use and Management of Containers	X	___

	YES	NO
H) Generator Accumulation Appendix	X	
I) Waste Pile		X
J) Surface Impoundment		X
K) Landfill		X

5) Hazardous Waste Streams/EPA #

Streams/EPA #	Source	Rate	Disposition
1. Paint Solids (D001)	Solids	app. 4,000 gal/mth.	ash Groove Cement Kiln, Louisville, Nebraska
2. Charcoal Filters, Drum liners and clothing (D001)			
3. Still Bottoms from assorted "F" solvent Waste	solids		Blended into hazardous waste fuel and shipped to Marine Shale, Inc. Morgan City, La.

6) List all wastes not listed above.

Waste	Process Generating Waste	Rate	Disposition
1. General Refuse		40 yd^3 per wk.	Wheeler Landfill

7) If the company claims a reuse or reclaim exemption please include the following information:

	Waste Type	Generation Rate	How reclaimed & by Who	Quantity stored on Site
A.				
B.				

8) Hazardous Waste

On-Site	Amount	How Stored	Comments
D001, F001, 2, 3, & 5	446 (55 gal. containers)	S01	* overage
D001, F001, 2, 3 & 5	141,080	S02	
	*		

9) Has the capacity of the storage areas listed on the Part A exceeded that allowed? List the type and amount of actual storage capacity overages.
329 IAC 3-38-2 (HWIMS 610)

Yes, contain storage 24,530 gallons or 446 containers
the part A allows 15,500 or 300 (55) gallon containers
In addition there were 355 gallons of H.W. in 5 gallon pails.

10) Indicate any TSD activities which have been omitted from or are not clear on the facility map (for the purpose of determining if expansion has occured)
(40 CFR 270.13 and 329 IAC 3-34-4) (HWIMS 610)

N/A

11) Is the Biennial Report Accurate? 1989 will be due

12) Note any non-RCRA Violations (Open Dumping, Dumping in City Sewer Without Pretreatment Program, OSHA, etc.) N/A

13) Additional Comments:

ACS waste tracking system

(containers) → STILL Bottoms (Treatment)

(Bulk waste) → TANK → STILL → WASTE Fuel TANK → H. W. Fuel → Waste

Manifest → TANK Log + → TANK Log + → TANK Log → Manifest

Daily Inventory Sheet STILL Sheets

General Facility Standards (paperwork)

		OK	DF	NI	NA
1)	Has the Regional Administrator/Environmental Management Board been notified regarding:				
a.	Receipt of hazardous waste from a foreign source? 40 CFR 265.12(a) (329 IAC 3-16-3) (HWIMS 300)				X
b.	Facility expansion? 40 CFR 270.72(b) (329 IAC 3-38-3) (HWIMS 610)				X
c.	Change of owner or operator? 40 CFR 265.12(b) (329 IAC 3-16-3) (HWIMS 300)				X

2) General Waste Analysis: (HWIMS 310)

		OK	DF	NI	NA
a.	Has the owner or operator made a detailed chemical and physical analysis of the waste either through testing of knowledge of the process? 40 CFR 265.13(a)1 (329 IAC 3-16-4)	X			
b.	Does the owner or operator have a detailed waste analysis plan on file at the facility? 40 CFR 265.13(b) (329 IAC 3-16-4)	X			
	Does the waste analysis plan contain:				
	1. parameters (and rationale for their choice)	X			
	2. test methods	X			
	3. sampling method for representative sample	X			
	4. frequency of analysis (and rationale)	X			
	5. off-site only: waste analysis from generators	X			
	6. Additional waste analysis needed (when a change in waste type or process occurs)				
	a. 265.193 (329 IAC 3-24-3)Tanks (see above)	X			
	b. 265.225 (329 IAC 3-25-4)Impoundment (same as above)				X
	c. 265.252 (329 IAC 3-26-3)Waste Pile (same as above)				X
	d. 265.273 (329 IAC 3-27-3)Land Treatment (same as above)				X
	e. 265.341 (329 IAC 3-29-2)Incinerators (same as above)				X

	OK	DF	NI	NA
f. 265.375 (329 IAC 3-30-3) Thermal Treatment (same as above)				X
g. 265.402 (329 IAC 3-31-3) Other Treatment (same as above)				X

c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? 40 CFR 265.13(c) (329 IAC 3-16-4) — X

d. Is the waste analysis plan followed? yes

3) Owner or Operator Inspections: (HWIMS 320)

	OK	DF	NI	NA
a. Does the owner or operator inspect the facility for deterioration, malfunctions, operator errors, and discharges of hazardous waste that may affect human health or the environment? 40 CFR 265.15(a) (329 IAC 3-16-6)	X			
b. Does the owner or operator have an inspection schedule at the facility? 40 CFR 265.15(b)2 (329 IAC 3-16-6)	X			
c. If so, does the schedule address the inspection of the following items: 40 CFR 265.15(b)1 (329 IAC 3-16-6)				
i. monitoring equipment?	X			
ii. safety and emergency equipment?	X			
iii. security devices (including fences)?	X			
iv. operating and structural equipment (ie. dikes, pumps, etc.)?	X			
v. type of problems to be looked for during the inspection (e.g. leaky fittings, defective pump, etc.)? 40 CFR 265.15(b)(2) (329 IAC 3-16-6)	X			

	OK	DF	NI	NA
vi. inspection frequency (based upon the possible deterioration rate of the equipment)? 40 CFR 265.15(b)(4) (329 IAC 3-16-6)	X			
vii. Must include:				
1. Weekly container storage? (See 265.174) (329 IAC 3-23-5)	X			
2. Daily and Weekly Tank Storage? (See 265.194) (329 IAC 3-24-4)	X			
3. Daily freeboard and weekly dike inspection for surface impoundments? (See 265.226) (329 IAC 3-25-5)	X			
4. Landfills, Thermal treatment, Chemical, Physical, and Biological treatment should be inspected as determined by deterioration rate and daily at loading and unloading areas (where spills are likely) [See 265.15(b)(4) (329 IAC 3-16-6)]				X
d. Does Owner or Operator follow the written inspection schedule as outlined? 265.15(b)(1) (329 IAC 3-16-6)	X			
e. Are areas subject to spills inspected daily when in use? 265.15(b)(4) (329 IAC 3-16-6)	X			
f. Does the owner or operator maintain an inspection log or summary of owner or operator inspections? 40 CFR 265.15(d) (329 IAC 3-16-6)	X			
g. Does the inspection log contain the following information: 40 CFR 265.15(d) (329 IAC 3-16-6)				
i. the date and time of the inspection?	X			
ii. the name of the inspector?	X			

	OK	DF	NI	NA
iii. a notation of the observations made?	X			
iv. the date and nature of any repairs or remedial actions?	X			

4) Do personnel training records include: (HWIMS 330)

a. Job titles for the positions related to HWM 40 CFR 265.16(d)1 (329 IAC 3-16-7)	X			
b. The name of the employees filling each job title? 40 CFR 265.16(d)(1) (329 IAC 3-16-7)	X			
c. Job descriptions including the required skills, education, or other qualifications and the duties of the personnel assigned to the position? 40 CFR 265.16(d)2 (329 IAC 3-16-7)	X			

Check categories for which job titles/descriptions are available (please include the supervisors of each category in that category when reviewing documents).

Emergency coordinator X Training coordinator X Emergency response personnel X Inspectors X Material handlers X Container Tabelers X Manifesters X Recordkeepers X

d. Description of both introductory and continuing training required for each job? 40 CFR 265.16(d)(3) (329 IAC 3-16-7)	X			

Describe in general the type of training program in use at the facility.

Thomas Murphy is the Training Director, he provides class room training for safety, materials handling, emergency response and inspections. The current employees provide on the job training for new employees

e. Records of training required in (d)? 40 CFR 265.16(d)4 (329 IAC 3-16-7)	X			

f. Did facility personnel receive the required training including:

	OK	DF	NI	NA
i) classroom or on the job	X			
ii) within 6 months of hire	X			
iii) annual review of training?	X			
g. Are all training records maintained for current personnel and for at least three years for former employees? 40 CFR 265.16(e) [329 IAC 3-16-7(e)]	X			

CONTINGENCY PLAN AND EMERGENCY PROCEDURES (HWIMS 350)

1) Does the Contingency Plan contain the following information:

	OK	DF	NI	NA
a. The actions facility personnel must take to comply with 265.51 (3-18-2) and 265.56 (3-18-7) in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable).	X			
A. A description of arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services. 329 IAC 3-18-3	X			
i. Names, addresses, and phone numbers of all persons qualified to act as emergency coordinators?	X			
ii. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? 40 CFR 265.52(e) (329 IAC 3-18-3)	X			

	OK	DF	NI	NA
iii. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must decribe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.) 40 CFR 265.52(f) (329 IAC 3-18-3)	X			
2) Emergency Coordinator:				
a. Is the facility Emergency Coordinator identified? 40 CFR 265.52(d) (329 IAC 3-18-3)	X			
b. Is coordinator familiar with all aspects of site operation and emergency procedures? 40 CFR 265.55 (329 IAC 3-18-6)	X			
c. Does Emergency Coordinator have the authority to carry out the Contingency Plan? 40 CFR 265.55 (329 IAC 3-18-6)	X			

2) a. Jim Murphy

Preparedness and Prevention

	OK	DF	NI	NA
1) Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility? 40 CFR 265.37 (329 IAC 3-17-7) (HWIMS 340)	X			
2) Are copies of the Contingency Plan available at the site and local emergency organizations? 40 CFR 265.53 (329 IAC 3-18-4) (HWIMS 350)	X			
3) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56 (329 IAC 3-18-7)? (HWIMS 350)				X

1) sign-off forms from local authorities are on file.

MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING:

		OK	DF	NI	NA
1)	Use of Manifest System: (HWIMS 360)				
	a. Does the facility follow the procedures listed in 265.71 (3-19-2) for processing each manifest? (Particularly sending a copy of the signed manifest back to thegenerator within 30 days after delivery.)	X			
	b. Are records of past shipments retained for three (3) years? 40 CFR 265.71(b)5 (329 IAC 3-19-2)	X			
2)	Does the owner or operator meet requirements regarding manifest discrepancies? (Off-site facilities only) 40 CFR 265.72 (329 IAC 3-19-3)				X
3)	Unmanifested Waste Reports: (applies only to Off-site facilities)				
	a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 (3-8-1) without a manifest or shipping paper? 40 CFR 265.76 (329 IAC 3-19-7)				X
	b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type and date received for each unmanifested hazardous waste shipment.				
	c. Has the facility submitted 8700-13B (unmanifested waste report)?				
4)	Closure/Post Closure				
	a. Is the closure plan available for inspection? 40 CFR 265.112(a) (329 IAC 3-21-3) (HWIMS 390)	X			
	b. Is the post-closure plan available for inspection? (for disposal facilities only) 40 CFR 265.118(a) (329 IAC 3-21-8) (HWIMS 390)				X
	c. Has the closure cost and post closure cost estimate been revised annually to account for inflation. (HWIMS 400)	X			

5) Operating Record: (HWIMS 370)	OK	DF	NI	NA
a. Does owner or operator have a operating record? 40 CFR 265.73(a)	X			
b. Does the owner or operator maintain an operating record that contains the following information?				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR 265 Appendix I (329 IAC 3-32-2)? 40 CFR 265.73(b)(1) (329 IAC 3-19-4)	X			

Summarize how the facility tracks the method and date of TSD activity.

(See comments page 5)

ii. The location and quantity of each hazardous waste within the facility? (This information shall be cross referenced to a specific manifest number if the waste was accompanied by manifest.) 40 CFR 265.73(b)(2) (329 IAC 3-19-4)	X			

Summarize how the facility tracks the location and quantity of waste.

(See comments page 5)

iii. A ~~map~~ or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross referenced to specific manifest number, if accompanied by a manifest.) 40 CFR 265.73(b)(2) (329 IAC 3-19-4)	X			
iv. Records and results of all waste analyses, trial tests, monitoring data, and operating inspections? 40 CFR 265.73(b)(3)(5)(6) (329 IAC 3-19-4)	X			
v. Reports detailing all incidents that required implementation of the Contingency Plan? 40 CFR 265.73(b)(4) (329 IAC 3-19-4)				X
vi. All closure and post closure costs as applicable? 40 CFR 265.73(b)(7) (329 IAC 3-19-4)	X			

TANK FARMS + CONTAINER STORAGE AREA

GROUNDWATER MONITORING

40 CFR Subpart F

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

		OK	DF	NI	NA
1)	Has the owner or operator of the facility implemented a groundwater monitoring system? 40 CFR 265.90(a) (329 IAC 3-20-1) (HWIMS 380)	___	___	___	X
2)	Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in 265.90(d) (329 IAC 3-20-1)? (HWIMS 380)	___	___	___	X

APPENDIX GN

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Manifest Requirements: (HWIMS 110)	OK	DF	NI	NA
1) Does the operator have copies of the manifest available for review? 40 CFR 262.40 (329 IAC 3-10-1)	X			
2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period	48 Liquid / Solid			
3) Do the manifest forms examined contain the following information. 40 CFR 262.21 (329 IAC 3-8-1)				
a. Manifest document number? EPA ID No. + Unique 5 digit No.? (A sequential number for all manifests before September 20, 1984, and a five digit unique number after September 20, 1984.)	X			
b. Name, mailing address, telephone number, and EPA ID number of generator?	X			
c. Name, telephone number (3-14-3) and EPA ID Number of Transporter(s)?	X			
d. Name, Address, telephone number (3-14-3) and EPA ID Number of designated permitted facility?	X			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	X			
f. The total quantity of waste(s) and the type and number of containers loaded?	X			
g. Required certification?	X			
h. Required signatures?	X			
i. EPA hazardous waste number (3-14-3)?	X			

Rail Car

4) Reportable exceptions:
40 CFR 262.42 (329 IAC 3-10-3) (HWIMS 180)

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. none

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) (329 IAC 3-10-3) to the Regional Administrator.

INTERNATIONAL SHIPMENTS: (HWIMS 190)

	OK	DF	NI	NA
1) Has the installation imported or exported hazardous waste? 40 CFR 262.50 (329 IAC 3-11-1) (If answered Yes, complete the following as applicable.)				X
a. Exporting hazardous waste; has a generator:				
i. Notified the administrator in writing?				
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
iii. Met the Manifest requirements?				
b. Importing hazardous waste; has the generator met the manifest requirements?				

RECORDKEEPING AND REPORTING:

1) Has the generator made a proper hazardous waste determination for all solid wastes generated at the facility? 40 CFR 262.11 (329 IAC 3-7-2) (HWIMS 100)	X			

		OK	DF	NI	NA
2)	Has the generator submitted biennial reports and exception reports as required? 329 IAC 3-10-2 and 329 IAC 3-10-3 (HWIMS 180/360)	X			
3)	Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 40 CFR 262.40 (329 IAC 3-10-1) (HWIMS 180)	X			

DRAW A SITE MAP; identify site of all hazardous waste activity, i.e. accumulation areas, storage areas, treatment areas, etc.

See part B file.

Remember to take photos and document as well as possible all violations!!!

5015S
kaw
1/31/89

ACS

Appendix C
Hazardous Waste Burned for Energy Recovery
Section I. is for marketers and Section II. for burners

I. Marketers

	OK	DF	NI	NA
1) Has this facility notified as a Marketer? [266.34(b)] and [320 IAC 4.1-32.5-9(b)]	X			
2) Is the hazardous waste fuel stored as a hazardous waste ? [266.34(c)] and [320 IAC 4.1-32.5-9(c)]	yes			
3) Is the hazardous waste fuel shipped offsite with a manifest ? [266.34(d) and [320 IAC 4.1-32.5-9(d)]	X			
4) Has the marketer obtained a one-time certification from the burner or other marketer that;				
a. The burner or marketer has notified of their waste as fuel activities ? [266.34(e)(1)i] and [320 IAC 4.1-32.5-9(e)(1)i]	X			
b. If the recipent is a burner that the waste will be burned only in approved industrial furnaces or boilers [See 266.31(a)(2)b] ? [266.34(e)(1)ii] and [320 IAC 4.1-32.5-9(e)(1)ii]	X			
5) Has the marketer provided a one-time certification that he has notified of his waste as fuel activity prior to his first shipment of fuel to that another marketer ? [266.34(e)(2)] and [320 IAC 4.1-32.5-9(e)(2)]	X			
6) Are all certifications received or sent by the marketer maintained at the site for at least three years ? [266.34(f)] and [320 IAC 4.1-32.5-9(f)]	X			

Comments:

ACS 9/29/89

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24)

(HWIMS 170/420)

Integrity Assessment Deadlines

Tank System(s)	Deadline
*(1) New installation	At time of
Tank System ID: _____ Date: _____	
_____ _____	
(2) Existing Underground- Cannot Enter (interim status and permitted only)	January 12, 1988 (HSWA)
Tank System ID: _____ Date: _____	
_____ _____	
(3) All remaining Existing Tanks	December 20, 1989
Tank System ID: Injection Storage Tanks (Location "C") Tank numbers: 202, 203, 204, 205, 206, 210, 211, 212	Date: Integrity Assessment provided on Jan. 11, 1988

Secondary Containment Deadlines

Tank System(s)	Deadline
*(1) New	Before putting into use
Tank System ID: _____ Date: _____	
_____ _____	
(2) Existing Underground that cannot be entered (interim status and permitted only)	January 12, 1988 (HSWA)
Tank System ID: _____ Date: _____	
_____ _____	

* New Tank System = operation or installation commenced after July 14, 1986

(3) Existing that S/T Dioxin Waste — June 20, 1990

Tank System ID: _____ Date: _____

(4) Existing-Age Known/ Documentable — June 20, 1990/when tank reaches 15 years old, whichever is later

Location "C"

Tank System ID: 202 — Date: 6/20/90
203 — 6/20/90
204 — 6/20/90
205 — 6/20/90
206 — 6/20/90
210 — 6/20/90
211 — 6/20/90
212 — Aug. 1996

(5) Existing-Age Unknown Facility Age greater than 7 years old — June 20, 1990/when facility reaches 15 years old, whichever is later

Tank System ID: _____ Date: _____

(6) Existing-Age Unknown Facililty Age less than 7 years old — June 20, 1996

Tank System ID: _____ Date: _____

Leak Test

All Tank Systems Without Secondary Containment — Leak test annually

Tank System ID: Location "C" — Date: Tank wall thickness is measured each year.

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-5)

General Operating Requirements

	YES	NO	NI	NA
1. Are spill prevention controls (e.g. check valves, dry disconnect couplings) in use? 329 IAC 3-24-5(b)1	X			
2. Are over fill prevention controls (e.g. level sensing devices, high level alarms) present and operational? 329 IAC 3-24-5(b)2	X			
3. Is sufficient freeboard maintained in uncovered tanks to prevent overtopping due to wave or wind action or by precipitation? 329 IAC 3-24-5(b)3				X
4. Has the owner/operator complied with the requirements of 329 IAC 3-24-7 if a leak or spill has occurred in the tank system? (See "leak and spill checklist") 329 IAC 3-24-5(c)				X

II. Burners

	OK	DF	NI	NA
1) Has this facility notified as a Burner? [266.35(b)] and [320 IAC 4.1-32.5-10(b)]	yes	—	—	—
2) Is the hazardous waste fuel stored (or accumulated for generators who burn on site) as a hazardous waste ? [266.35(c)1 & 2] and [320 IAC 4.1-32.5-10(c)1 & 2]	yes	—	—	—
3) Has the burner provided the marketer with a certification that he has notified of waste as fuel activites and that he will burn only in approved furnaces or boilers ? [266.35(d)] and [320 IAC 4.1-32.5-10(d)]	yes	—	—	—
4) Are certification forms provided to marketers maintained on file for at least three years ? [266.35(e)] and [320 IAC 4.1-32.5-10(e)]	yes	—	—	—

Comments:

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24-6)

General Inspection Requirements

	YES	NO	NI	NA
1. Does the owner/operator inspect, where present overfill spill control equipment, (e.g. waste-feed cutoff systems, bypass systems, and drainage systems) to ensure that it is in good working order, at least once each operating day? 329 IAC 3-24-6(a)1	X			
2. Does the owner/operator inspect the above ground portions of the tank system to detect corrosion or release of waste once each operating day? 329 IAC 3-24-6(a)2	X			
3. Does the owner/operator inspect data gathered from monitoring equipment and leak-detection equipment (e.g. pressure and temperature gauges, monitoring wells) to ensure that tank system is operated according to design once each operating day? 329 IAC 3-24-6(a)3	X			
4. Does the owner/operator inspect the construction materials and the area immediately surrounding the accessible portion of the tank system including secondary containment structure to detect erosion or signs of releases once each operating day? 329 IAC 3-24-6(a)4				X
5. Has the owner/operator confirmed, if present, the proper operation of the cathodic protection system within six (6) months of initial installation? 329 IAC 3-24-6(b)1				

Date of installation _____ Date of inspection _____

6. Does the owner/operator inspect the cathodic protector system annually after installation? 329 IAC 3-24-6(b)1				
7. Does the owner/operator inspect all sources of impressed current at least bi-monthly (every other month)? 329 IAC 3-24-6(b)2				

Method used to inspect impressed-current system _____

8. Does the owner/operator document the above-mentioned inspections (#1-7)? 329 IAC 3-24-6(c)				

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24-2)

Existing Tank Systems Integrity Assessment

Tank System I.D. "C" Location

Tank Volume: 202 = 18,000
203 = 16,000 usable
204 = 17,000
205 = 18,000
206 = 17,000
210 = 23,000
211 = 23,000
212 = 24,000

Tank Type: above
above, on, in, below ground

	YES	NO	NI	NA
1. Does the tank system have secondary containment? 329 IAC 3-24-4		X		

If yes, see Secondary Containment Checklist, If no, continue below

Date when integrity assessment is required Dec. 29, 1989

Date when secondary containment is required See page (2) of this form

	YES	NO	NI	NA
2. Has the facility been granted a variance (exemption) from secondary containment per 329 IAC 3-24-4(g)				X
3. Is a written assessment of tank system integrity on file? 329 IAC 3-24-2(a)	X			
4. If assessment is provided, has it been reviewed and certified by an independent registered, professional engineer? 329 IAC 3-24-2(a)	X			
5. Does the integrity assessment include the following: 329 IAC 3-24-2(b)				
a. Documented age of the tank system.	X			
b. Design standards, if available, which the tank and ancillary equipment were constructed.	X			
c. Hazardous characteristics of the waste that have been or will be handled.	X			
d. Existing corrosion protection measures.	X			
e. Results of leak test, internal inspection, or other tank system integrity exams.	X			

TABLE 1

	YES	NO	NI	NA
6. Did the integrity assessment consist of a leak test? 329 IAC 3-24-2(b)5B	X			

Method of leak testing used All ancillary equipment was pressure tested at 80psi, the tanks were filled to a specific volume and then inspected.

-or-

7. Did the integrity assessment consist of a certified internal inspection that addresses cracks, leaks, corrosion and erosion? 329 IAC 3-24-2(b)5B				
8. Has a leak test or internal inspection by an independent, qualified, registered professional engineer that addresses cracks, leaks, corrosion, and erosion been done annually? 329 IAC 3-24-4(i)2				

Non-enterable, Unground tanks

1. Does the assessment consist of a leak test that takes into account the effects of: 329 IAC 3-24-2(b)5A				N/A
a. temperature variations				
b. tank end deflection				
c. vapor pockets				
d. high water table effects				

Method of leak testing used _____

2. Has a leak test been done annually? 329 IAC 3-24(i)1				

TANK SYSTEM(S)

N/A

40 CFR 265 - Subpart J - (329 IAC 3-24-3)

New Tank Systems

Tank Volume: _____ Tank Type: _____
above, on, in, below ground

Tank Construction: _____
fiberglass, reinforced plastic, mild steel, etc.

	YES	NO	NI	NA
1. Has the owner/operator obtained a written assessment reviewed and certified by an independent engineer attesting that the system has sufficient structural integrity and is acceptable for S/T of hazardous waste? 329 IAC 3-24-3(a)	___	___	___	___
2. Does the assessment include the following:				
a. Design standards according to which the tank(s) will be constructed 329 IAC 3-24-3(a)1	___	___	___	___
b. Hazardous characteristics of the waste(s) to be handled 329 IAC 3-24-3(a)2	___	___	___	___
c. For tank systems in which the external shell of a metal tank or any component is or will be in contact with the soil or water. Has a corrosion expert conducted a corrosion potential assessment? 329 IAC 3-24-3(a)3A	___	___	___	___
d. Has a corrosion expert determined the type and degree of external corrosion protection that are needed to ensure the integrity of the tank system?. 329 IAC 3-24-3(a)3B	___	___	___	___
e. For tank systems that are affected by vehicular traffic has a determination of design and/or operational measures that will protect the tank system against damage. 329 IAC 3-24-3(a)4	___	___	___	___
f. Design considerations to ensure proper tank foundations, anchoring, and prevention of frost heave. 329 IAC 3-24-3(a)5	___	___	___	___

	YES	NO	NI	NA
3. Has a qualified installation inspector or independent engineer inspected the tank installation prior to covering, enclosing, or placing a new tank system in use? 329 IAC 3-24-3(b)	___	___	___	___
4. Did the inspection check for the presence of the following:				
weld breaks	___	___	___	___
punctures	___	___	___	___
scrapes of protective coatings	___	___	___	___
cracks	___	___	___	___
corrosion	___	___	___	___
other structural damage, or inadequate construction	___	___	___	___
5. Has the tank system been tested for tightness prior to being covered, enclosed, or put in use? 329 IAC 3-24-3(d)	___	___	___	___
6. Has the owner/operator provided and has a corrosion expert supervised the installation of any field fabricated corrosion protection (e.g. cathodic protection)? 329 IAC 3-24-3(f)	___	___	___	___
7. Has the owner/operator obtained and kept on file written statements by those persons requested to certify the design and supervise the installation of the tank system in accordance with 329 IAC 3-24-3(b thru f)? 329 IAC 3-24-3(g)	___	___	___	___
8. Do these written statements include the certification statement as required by 329 IAC 3-34-2(d)?	___	___	___	___

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-4)

Secondary Containment

Secondary Containment consist of the following:

(circle one) liner, vault, double-walled component, an equivalent device as approved

Type of leak detection equipment employed. not provided

	YES	NO	NI	NA
*1. Is the secondary containment system constructed of or lined with materials that are compatible with the waste and have sufficient strength and thickness to prevent failure? 329 IAC 3-24-4(c)1			X	
*2. Is the secondary containment system placed on a foundation or base capable of providing support? 329 IAC 3-24-4(c)2			X	
3. Is the secondary containment system provided with a leak detection system that will detect the failure of either the primary or secondary containment structure within 24 hours? 329 IAC 3-24-4(c)3				
4. Is the secondary containment system sloped or otherwise designed or operated to drain and remove liquids within 24 hours? 329 IAC 3-24-(c)4				
*5. Will the secondary containment (liners and vaults) contain 100% of the design capacity of the largest tank in its boundry plus a 25 year - 24 hour rainfall? 329 IAC 3-24-4(e)1A and 2A			X	
6. Is the secondary containment system designed or operated to prevent run-on or infiltration of precipitation into the system unless the collection system has sufficient excess capacity to contain run-on or infiltration. 329 IAC 3-24-4(e)1B and 2B				
7. External Liner Systems				
a. Does the liner cover all the surrounding earth likely to come into contact with wastes, including berms and dikes? 329 IAC 3-24-4(e)1D				
b. Whether clay, polymeric, or concrete, is the liner free of cracks, gaps, tears, rips, etc.? 329 IAC 3-24-4(e)1C				

* Item could not be field verified, requires review by technical staff

	YES	NO	NI	NA
8. Vault Systems				
a. Is the vault constructed with chemically resistant water stops at all joints? 329 IAC 3-24-4(e)2C	___	___	___	___
b. Does all concrete, including sumps, have an impermeable coating or lining? 329 IAC 3-24-4(e)2D	___	___	___	___
c. Is there deterioration of protective coatings or liners such as discoloration and film lifting or cracks? 329 IAC 3-24-4(e)2D	___	___	___	___
d. Is the vault provided with a means to protect against the formation of and ignition of vapors within the vault if ignitable or reactive waste is treated or stored? 329 IAC 3-24-4(e)2E	___	___	___	___
9. Double-walled Tanks				
a. If metal, is there appropriate corrosion protection for the inner and outer shell? 329 IAC 3-24-4(e)3B	___	___	___	___
b. Does the double-walled tank have an operational, built-in continuous leak-detection system capable of detecting a release within 24 hours or at the earliest practical time? 329 IAC 3-24-4(e)3C	___	___	___	___
10. Ancillary Equipment Exempt from Secondary Containment				
a. Is all above ground, straight piping that is not covered by secondary containment inspected daily? 329 IAC 3-4(f)1	___	___	___	___
b. Are all welded flanges, welded joints, and welded connections inspected for leaks daily? 329 IAC 3-24-4(f)2	___	___	___	___
c. Are all sealless of magnetic coupling pumps visually inspected for leaks daily? 329 IAC 3-24-4(f)3	___	___	___	___
d. Are all pressurized, above ground piping systems with automatic shutoff devices visually inspected daily? 329 IAC 3-24-4(f)4	___	___	___	___

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-4.7)

Response to Leaks and Spills

	YES	NO	NI	NA
1. In the event of a spill or leak did the owner/operator immediately remove the tank system from service and inspect the system for the cause of the release. 329 IAC 3-24-4-7(a)1				X
2. Was waste removed from leaking tank system and secondary containment within 24 hours of being detected, or at the earliest practicable time? 329 IAC 3-24-7(a)2				
3. Were visible releases to the environment contained and immediately removed? 329 IAC 3-24-7(a)3				
4. In the event of a release, to the environment, did the owner/operator report the incident to the Commissioner within 24 hours? 329 IAC 3-24-7(a)4A				
5. Did the owner/operator submit a written report to the Commissioner within 30 days of a release to the environment with the required information? 329 IAC 3-24-7(a)4C				
6. In the event of a release, has the tank system or secondary containment system been repaired or closed as required? 329 IAC 3-24-7(a)5				
7. Were any extensive repairs to the tank system or secondary containment system certified by an independent, qualified, registered engineer. 329 IAC 3-24-7(a)6				

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-9and 10)

Ignitable or Reactive Waste

	YES	NO	NI	NA
1. Has the waste been treated, mixed or otherwise rendered nonreactive or not ignitable? 329 IAC 3-24-9(a)1				X
-or-				
2. Is the tank protected from conditions that may cause it to ignite (use of spark proof tools) or protected from contact with materials that may cause it to react? 329 IAC 3-24-9(a)2	X			
3. Is the required National Fire Protection Association distance between waste tanks (ignitable waste) and public ways and adjoining properties maintained? 329 IAC 3-24-9(b)	X			
4. Has an appropriate method of tank system decontamination been selected for tanks which previously held incompatable waste? 329 IAC 3-24-10(a and b)				X

TANK SYSTEMS

Preparedness and Prevention

	YES	NO	NI	NA
1. Security - Do security measures include: (HWIMS 300)				
a. 24-hour surveillance? or				
b. Barrier around facility including controlled entry?	X			
c. Danger sign(s) at entrance?	X			
2. Maintenance and Operation of Facility (HWIMS 140/340, 810 spill)				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?				X
3. If required, does the facility have the following equipment? (HWIMS 140/340)				
a. Internal communications or alarm systems?	X			
b. Telephone or 2-way radios at the scene of operations?	X			
c. Portable fire extinquishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify.)	X			
4. Whenever waste is being handled, do all personnel have immediate access to an alarm or communication device (through another employee if always available)? (HWIMS 140/340)	X			

Testing and Maintenance of Emergency Equipment

(HWIMS 140/340)

5. a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	X			
b. Is emergency equipment in operable condition?	X			
6. Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas.)	X			

5041S
kaw
4/6/89

ACS 9/29/89

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24)

(HWIMS 170/420)

Integrity Assessment Deadlines

Tank System(s)	Deadline
*(1) New installation	At time of
Tank System ID: _____ Date: _____	
_____ _____	
(2) Existing Underground- Cannot Enter (interim status and permitted only)	January 12, 1988 (HSWA)
Tank System ID: _____ Date: _____	
_____ _____	
(3) All remaining Existing Tanks	December 20, 1989
Tank System ID: Crude Storage (Location B) and 1002 - year installed 1977 Date: Integrity Assessment provided on Jan. 11, 1988	

Tank numbers:
1A, 1B, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126

Secondary Containment Deadlines

Tank System(s)	Deadline
*(1) New use	Before putting into
Tank System ID: _____ Date: _____	
_____ _____	
(2) Existing Underground that cannot be entered (interim status and permitted only)	January 12, 1988 (HSWA)
Tank System ID: _____ Date: _____	
_____ _____	

* New Tank System = operation or installation commenced after July 14, 1986

(3) Existing that S/T Dioxin Waste — June 20, 1990

Tank System ID: _____ Date: _____

(4) Existing-Age Known/ Documentable — June 20, 1990/when tank reaches 15 years old, whichever is later

Tank System ID:	Date:
1A	6/20/90
1B	6/20/90
116	6/20/90
117	6/20/90
118	6/20/90
119	6/20/90
120	7/96
121	7/96
122	7/96
123	6/20/90
124	6/20/90
125	6/20/90
126	6/20/90
1002	1992

(5) Existing-Age Unknown Facility Age greater than 7 years old — June 20, 1990/when facility reaches 15 years old, whichever is later

Tank System ID: _____ Date: _____

(6) Existing-Age Unknown Facililty Age less than 7 years old — June 20, 1996

Tank System ID: _____ Date: _____

Leak Test

All Tank Systems Without Secondary Containment — Leak test annually

Tank System ID: Location B and 1002

Date: Tank wall thickness is measured each year.

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-5)

General Operating Requirements

	YES	NO	NI	NA
1. Are spill prevention controls (e.g. check valves, dry disconnect couplings) in use? 329 IAC 3-24-5(b)1	X			
2. Are over fill prevention controls (e.g. level sensing devices, high level alarms) present and operational? 329 IAC 3-24-5(b)2	X			
3. Is sufficient freeboard maintained in uncovered tanks to prevent overtopping due to wave or wind action or by precipitation? 329 IAC 3-24-5(b)3				X
4. Has the owner/operator complied with the requirements of 329 IAC 3-24-7 if a leak or spill has occurred in the tank system? (See "leak and spill checklist") 329 IAC 3-24-5(c)				X

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24-6)

General Inspection Requirements

	YES	NO	NI	NA
1. Does the owner/operator inspect, where present overfill spill control equipment, (e.g. waste-feed cutoff systems, bypass systems, and drainage systems) to ensure that it is in good working order, at least once each operating day? 329 IAC 3-24-6(a)1	X			
2. Does the owner/operator inspect the above ground portions of the tank system to detect corrosion or release of waste once each operating day? 329 IAC 3-24-6(a)2	X			
3. Does the owner/operator inspect data gathered from monitoring equipment and leak-detection equipment (e.g. pressure and temperature gauges, monitoring wells) to ensure that tank system is operated according to design once each operating day? 329 IAC 3-24-6(a)3				X
4. Does the owner/operator inspect the construction materials and the area immediately surrounding the accessible portion of the tank system including secondary containment structure to detect erosion or signs of releases once each operating day? 329 IAC 3-24-6(a)4				
5. Has the owner/operator confirmed, if present, the proper operation of the cathodic protection system within six (6) months of initial installation? 329 IAC 3-24-6(b)1				

Date of installation _____ Date of inspection _____

6. Does the owner/operator inspect the cathodic protector system annually after installation? 329 IAC 3-24-6(b)1				
7. Does the owner/operator inspect all sources of impressed current at least bi-monthly (every other month)? 329 IAC 3-24-6(b)2				

Method used to inspect impressed-current system _____

8. Does the owner/operator document the above-mentioned inspections (#1-7)? 329 IAC 3-24-6(c)				

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24-2)

Existing Tank Systems Integrity Assessment

Tank System I.D. Location B

1A = 2750
1B = 2750
116 = 10,800
117 = 10,800
118 = 10,800
119 = 10,800
120 = 6,000
121 = 10,500
122 = 10,500
123 = 19,500
124 = 19,500
1002 = 11,000

Tank Volume: _____ Tank Type: above
above, on, in, below ground

	YES	NO	NI	NA
1. Does the tank system have secondary containment? 329 IAC 3-24-4				
If yes, see Secondary Containment Checklist, If no, continue below				
Date when integrity assessment is required Dec. 29, 1989				
Date when secondary containment is required See page (2) of this form				
2. Has the facility been granted a variance (exemption) from secondary containment per 329 IAC 3-24-4(g)				X
3. Is a written assessment of tank system integrity on file? 329 IAC 3-24-2(a)	X			
4. If assessment is provided, has it been reviewed and certified by an independent registered, professional engineer? 329 IAC 3-24-2(a)	X			
5. Does the integrity assessment include the following: 329 IAC 3-24-2(b)				
a. Documented age of the tank system.	X			
b. Design standards, if available, which the tank and ancillary equipment were constructed.	X			
c. Hazardous characteristics of the waste that have been or will be handled.	X			
d. Existing corrosion protection measures.	X			
e. Results of leak test, internal inspection, or other tank system integrity exams.	X			

	YES	NO	NI	NA
6. Did the integrity assessment consist of a leak test? 329 IAC 3-24-2(b)5B	___	___	___	___

Method of leak testing used pressure test for ancillary equipment, fill test for tanks

-or-

7. Did the integrity assessment consist of a certified internal inspection that addresses cracks, leaks, corrosion and erosion? 329 IAC 3-24-2(b)5B	___	___	___	___
8. Has a leak test or internal inspection by an independent, qualified, registered professional engineer that addresses cracks, leaks, corrosion, and erosion been done annually? 329 IAC 3-24-4(i)2	___	___	___	___

Non-enterable, Unground tanks

1. Does the assessment consist of a leak test that takes into account the effects of: 329 IAC 3-24-2(b)5A

a. temperature variations	___	___	___	X
b. tank end deflection	___	___	___	___
c. vapor pockets	___	___	___	___
d. high water table effects	___	___	___	___

Method of leak testing used _____

2. Has a leak test been done annually? 329 IAC 3-24(i)1	___	___	___	___

N/A

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24-3)

New Tank Systems

Tank Volume: _____ Tank Type: _____
above, on, in, below ground

Tank Construction: _____
fiberglass, reinforced plastic, mild steel, etc.

	YES	NO	NI	NA
1. Has the owner/operator obtained a written assessment reviewed and certified by an independent engineer attesting that the system has sufficient structural integrity and is acceptable for S/T of hazardous waste? 329 IAC 3-24-3(a)	___	___	___	___
2. Does the assessment include the following:				
a. Design standards according to which the tank(s) will be constructed 329 IAC 3-24-3(a)1	___	___	___	___
b. Hazardous characteristics of the waste(s) to be handled 329 IAC 3-24-3(a)2	___	___	___	___
c. For tank systems in which the external shell of a metal tank or any component is or will be in contact with the soil or water. Has a corrosion expert conducted a corrosion potential assessment? 329 IAC 3-24-3(a)3A	___	___	___	___
d. Has a corrosion expert determined the type and degree of external corrosion protection that are needed to ensure the integrity of the tank system?. 329 IAC 3-24-3(a)3B	___	___	___	___
e. For tank systems that are affected by vehicular traffic has a determination of design and/or operational measures that will protect the tank system against damage. 329 IAC 3-24-3(a)4	___	___	___	___
f. Design considerations to ensure proper tank foundations, anchoring, and prevention of frost heave. 329 IAC 3-24-3(a)5	___	___	___	___

	YES	NO	NI	NA
3. Has a qualified installation inspector or independent engineer inspected the tank installation prior to covering, enclosing, or placing a new tank system in use? 329 IAC 3-24-3(b)	___	___	___	___
4. Did the inspection check for the presence of the following:				
weld breaks	___	___	___	___
punctures	___	___	___	___
scrapes of protective coatings	___	___	___	___
cracks	___	___	___	___
corrosion	___	___	___	___
other structural damage, or inadequate construction	___	___	___	___
5. Has the tank system been tested for tightness prior to being covered, enclosed, or put in use? 329 IAC 3-24-3(d)	___	___	___	___
6. Has the owner/operator provided and has a corrosion expert supervised the installation of any field fabricated corrosion protection (e.g. cathodic protection)? 329 IAC 3-24-3(f)	___	___	___	___
7. Has the owner/operator obtained and kept on file written statements by those persons requested to certify the design and supervise the installation of the tank system in accordance with 329 IAC 3-24-3(b thru f)? 329 IAC 3-24-3(g)	___	___	___	___
8. Do these written statements include the certification statement as required by 329 IAC 3-34-2(d)?	___	___	___	___

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-4)

N/A

Secondary Containment

Secondary Containment consist of the following:

(circle one) liner, vault, double-walled component, an equivalent device as approved

Type of leak detection equipment employed. not provided

	YES	NO	NI	NA
*1. Is the secondary containment system constructed of or lined with materials that are compatible with the waste and have sufficient strength and thickness to prevent failure? 329 IAC 3-24-4(c)1			X	
*2. Is the secondary containment system placed on a foundation or base capable of providing support? 329 IAC 3-24-4(c)2			X	
3. Is the secondary containment system provided with a leak detection system that will detect the failure of either the primary or secondary containment structure within 24 hours? 329 IAC 3-24-4(c)3				
4. Is the secondary containment system sloped or otherwise designed or operated to drain and remove liquids within 24 hours? 329 IAC 3-24-(c)4				
*5. Will the secondary containment (liners and vaults) contain 100% of the design capacity of the largest tank in its boundry plus a 25 year - 24 hour rainfall? 329 IAC 3-24-4(e)1A and 2A			X	
6. Is the secondary containment system designed or operated to prevent run-on or infiltration of precipitation into the system unless the collection system has sufficient excess capacity to contain run-on or infiltration. 329 IAC 3-24-4(e)1B and 2B				
7. External Liner Systems				
a. Does the liner cover all the surrounding earth likely to come into contact with wastes, including berms and dikes? 329 IAC 3-24-4(e)1D				
b. Whether clay, polymeric, or concrete, is the liner free of cracks, gaps, tears, rips, etc.? 329 IAC 3-24-4(e)1C				

* Item could not be field verified, requires review by technical staff

	YES	NO	NI	NA
8. Vault Systems				
a. Is the vault constructed with chemically resistant water stops at all joints? 329 IAC 3-24-4(e)2C	___	___	___	___
b. Does all concrete, including sumps, have an impermeable coating or lining? 329 IAC 3-24-4(e)2D	___	___	___	___
c. Is there deterioration of protective coatings or liners such as discoloration and film lifting or cracks? 329 IAC 3-24-4(e)2D	___	___	___	___
d. Is the vault provided with a means to protect against the formation of and ignition of vapors within the vault if ignitable or reactive waste is treated or stored? 329 IAC 3-24-4(e)2E	___	___	___	___
9. Double-walled Tanks				
a. If metal, is there appropriate corrosion protection for the inner and outer shell? 329 IAC 3-24-4(e)3B	___	___	___	___
b. Does the double-walled tank have an operational, built-in continuous leak-detection system capable of detecting a release within 24 hours or at the earliest practical time? 329 IAC 3-24-4(e)3C	___	___	___	___
10. Ancillary Equipment Exempt from Secondary Containment				
a. Is all above ground, straight piping that is not covered by secondary containment inspected daily? 329 IAC 3-4(f)1	___	___	___	___
b. Are all welded flanges, welded joints, and welded connections inspected for leaks daily? 329 IAC 3-24-4(f)2	___	___	___	___
c. Are all sealless of magnetic coupling pumps visually inspected for leaks daily? 329 IAC 3-24-4(f)3	___	___	___	___
d. Are all pressurized, above ground piping systems with automatic shutoff devices visually inspected daily? 329 IAC 3-24-4(f)4	___	___	___	___

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-4.7)

Response to Leaks and Spills

	YES	NO	NI	NA
1. In the event of a spill or leak did the owner/operator immediately remove the tank system from service and inspect the system for the cause of the release. 329 IAC 3-24-4-7(a)1				X
2. Was waste removed from leaking tank system and secondary containment within 24 hours of being detected, or at the earliest practicable time? 329 IAC 3-24-7(a)2				
3. Were visible releases to the environment contained and immediately removed? 329 IAC 3-24-7(a)3				
4. In the event of a release, to the environment, did the owner/operator report the incident to the Commissioner within 24 hours? 329 IAC 3-24-7(a)4A				
5. Did the owner/operator submit a written report to the Commissioner within 30 days of a release to the environment with the required information? 329 IAC 3-24-7(a)4C				
6. In the event of a release, has the tank system or secondary containment system been repaired or closed as required? 329 IAC 3-24-7(a)5				
7. Were any extensive repairs to the tank system or secondary containment system certified by an independent, qualified, registered engineer. 329 IAC 3-24-7(a)6				

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-9and 10)

Ignitable or Reactive Waste

	YES	NO	NI	NA
1. Has the waste been treated, mixed or otherwise rendered nonreactive or not ignitable? 329 IAC 3-24-9(a)1				X
-or-				
2. Is the tank protected from conditions that may cause it to ignite (use of spark proof tools) or protected from contact with materials that may cause it to react? 329 IAC 3-24-9(a)2	X			
3. Is the required National Fire Protection Association distance between waste tanks (ignitable waste) and public ways and adjoining properties maintained? 329 IAC 3-24-9(b)	X			
4. Has an appropriate method of tank system decontamination been selected for tanks which previously held incompatable waste? 329 IAC 3-24-10(a and b)				X

TANK SYSTEMS

Preparedness and Prevention

	YES	NO	NI	NA
1. Security - Do security measures include: (HWIMS 300)				
a. 24-hour surveillance? or				
b. Barrier around facility including controlled entry?	X			
c. Danger sign(s) at entrance?	X			
2. Maintenance and Operation of Facility (HWIMS 140/340, 810 spill)				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?				X
3. If required, does the facility have the following equipment? (HWIMS 140/340)				
a. Internal communications or alarm systems?	X			
b. Telephone or 2-way radios at the scene of operations?	X			
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify.)	X			
4. Whenever waste is being handled, do all personnel have immediate access to an alarm or communication device (through another employee if always available)? (HWIMS 140/340)	X			

Testing and Maintenance of Emergency Equipment

(HWIMS 140/340)

5. a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	X			
b. Is emergency equipment in operable condition?	X			
6. Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas.)	X			

5041S
kaw
4/6/89

Use and Management of Containers

Location of Unit Location A

(HWIMS 160/410)

	OK	DF	NI	NA
1) Are containers in good condition?	X			
2) Are containers compatible with waste in them?	X			
3) Are containers managed to prevent leaks?	X			
4) Are containers stored closed?	X			
5) Are ignitable and ~~reactive~~ wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). ignitable	X			
6) Are incompatable wastes stored in separate containers? (If not the provisions of 265.17(b) apply)				X
7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				X
8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
a. Special handling?	X			
b. No Smoking signs?	X			
c. Separation and protection from ignition sources?	X			
9) Does the container storage area have adequate aisle space (about 2.5 feet)?	X			
10) Can containers be inspected for leaks or deterioration without moving the containers during the inspection?	X			

Preparedness and Prevention

11) Security - Do security measures include: (HWIMS 300)				
a. 24- hour surveillance? or				X
b. Barrier around facility including controlled entry?	X			
c. Danger sign(s) at entrance?	X			
12) Maintenace and Operation of Facility: (HWIMS 140/340, 810 spill)				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?				X

13) If required, does the facility have the following equipment:
(HWIMS 140/340)

	OK	DF	NI	NA
a. Internal communications or alarm systems?	X			
b. Telephone or 2-way radios at the scene of operations?	X			
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic spinklers or water spray equipment available? (Please specify)	X			

14) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? (HWIMS 140/340) — X

Testing and Maintenance of Emergency Equipment

(HWIMS 140/340)

	OK	DF	NI	NA
15) a. Has the owner or operator established testing and maintenace procedures for emergency equipment?	X			
b. Is emergency equipment in operable condition?	X			
16) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas)	X			

*TSD's Only

check for comments on back!

Use and Management of Containers

1) Are containers in good condition? 40 CFR 265.170 (329 IAC 3-23-1)
2) Are containers compatible with waste? 40 CFR 265.172 (329 IAC 3-23-3)
3) Containers managed to prevent leaks? 40 CFR 265.173(b) (329 IAC 3-23-4)
4) Are containers stored closed? 40 CFR 265.173(d) (329 IAC 3-23-4)
5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). 40 CFR 265.176 (329 IAC 3-23-6)
6) Are incompatable wastes stored in separate containers? (If not provisions of 265.17(b) apply) 40 CFR 265.177(a) (329 IAC 3-23-7)
7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? 40 CFR 265.177(c) (329 IAC 3-23-7)
8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?
   a. Special handling?
   b. No Smoking signs?
   c. Separation and protection from ignition sources?
   40 CFR 265.17(a) (329 IAC 3-16-8)
9) Does the container storage area have adequate aisle space (about 2.5 feet)? [329 IAC 3-23-4 (c)]
10) Can containers be inspected for leaks or deterioration without moving the containers [329 IAC 3-23-4 (c)]
11) *Security-Do security measures include:
   a. 24- hour surveillance? or
   b. Barrier around facility including controlled entry?
   c. Danger sign(s) at entrance? 40 CFR 265.14 (329 IAC 3-16-5)
12) Maintenace and Operation of Facility
   a. Is there any evidence of fire, explosion, or release of hazardous waste constituent? 40 CFR 265.31 (329 IAC 3-17-2)
13) If required, does the facility have the following equipment:
   a. Internal communications or alarm systems?
   40 CFR 265.32 (a) & 40 CFR 265.34 (a) (329 IAC 3-17-3 & 5)
   b. Telephone or 2-way radios at the scene of operations?
   40 CFR 265.32 (b) & 40 CFR 265.34 (b) (329 IAC 3-17-3 & 5)
   c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic spinklers or water spray equipment available? 40 CFR 265.32(c)[329 IAC 3-17-3(c)]
14) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)?
   40 CFR 265.34(a)[329 IAC 3-17-5]
15) a. Has the owner or operator established testing and maintenace procedures for emergency equipment?
   40 CFR 265.33 [329 IAC 3-17-4]
   b. Is emergency equipment in operable condition?
   40 CFR 265.33 [329 IAC 3-17-4]
16) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas) 40 CFR 265.35 [329 IAC 3-17-6]

*TSD's Only

Generator Accumulation Appendix
(HWIMS 120)

Location of Unit Crude Storage (Location B)

	OK	DF	NI	NA
1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations? 40 CFR 262.30-262.32 (329 IAC 3-9-1 to 3)			X	
2) Is the container clearly marked with the start of accumulation date? 40 CFR 262.34 (329 IAC 3-9-5)				X
3) Have more than 90 days elapsed since the date inspected in (a)? 40 CFR 262.34 (329 IAC 3-9-5)				↓
4) Do wastes remain in accumulation tanks for more than 90 days? 40 CFR 262.34 (329 IAC 3-9-5				↓
5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"? 40 CFR 262.34 (329 IAC 3-9-5)				↓

Satellite Accumulation
(HWIMS 120)

	OK	DF	NI	NA
1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents? 40 CFR 262.34 (329 IAC 3-9-5 (c))	X			
2) Are containers in good condition, compatible with the wastes in them and stored closed? 40 CFR 262.34 (329 IAC 3-23-2 & 3 & 4(a))	X			

0022S
kaw
1/13/89

Generator Accumulation Appendix
(HWIMS 120)

Location of Unit Inject Storage Tanks (Location "C")

	OK	DF	NI	NA
1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations? 40 CFR 262.30-262.32 (329 IAC 3-9-1 to 3)			X	
2) Is the container clearly marked with the start of accumulation date? 40 CFR 262.34 (329 IAC 3-9-5)				X
3) Have more than 90 days elapsed since the date inspected in (a)? 40 CFR 262.34 (329 IAC 3-9-5)				
4) Do wastes remain in accumulation tanks for more than 90 days? 40 CFR 262.34 (329 IAC 3-9-5				
5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"? 40 CFR 262.34 (329 IAC 3-9-5)				

Satellite Accumulation
(HWIMS 120)

	OK	DF	NI	NA
1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents? 40 CFR 262.34 (329 IAC 3-9-5 (c))	X			
2) Are containers in good condition, compatible with the wastes in them and stored closed? 40 CFR 262.34 (329 IAC 3-23-2 & 3 & 4(a))	X			

0022S
kaw
1/13/89

PREINSPECTION FILES AUDIT
CHECKLIST

DATE: 9/27/89

BY: Ted Warner

COMPANY: American Chemical Service, Inc.

LOCATION: 420 S. Colfax Griffith

I.D.#: IND 1 016 1360 1265

Type of inspection (G)----T----(TSD)----Closure---Complaint---Other(please specify)

A. GENERAL

		YES	NO	NA
1.	FEDERAL NOTIFICATION ON FILE?	X	—	—
2.	FEDERAL PART A ON FILE?	X	—	—
3.	CLOSURE PLAN REVIEWED?	X	—	—
4.	CONTINGENCY PLAN REVIEWED?	X	—	—
5.	BIENNIAL REPORT REVIEWED?	X	—	—
*6.	PART B PERMIT REVIEWED?	X	—	—

*(Note any Special Permit Conditions)

Comments:

B. NOTIFICATION DATA (Notify type, waste codes listed, etc.)

D001, F001,2,3 & 5

C. LAND DISPOSAL INFORMATION

1. List Waste and Land Disposal Facility

N/A

D. LIST POSSIBLE WASTE STREAMS NOT LISTED ON BIENNIAL REPORT

none

E. LIST WASTE MANAGEMENT PRACTICES WHICH MAY REQUIRE A PERMIT

n/a

F. FEDERAL PART A (Handling Codes), OR PART B PERMIT

	Code	Amount	Unit of Measure	
1.	S01	16,500	G	300 (55) gal. cont.
2.	S02	320,700	G	
3.	T04	50,000	G	Solvent and Fuel Recycling Capacities
4.				
5.				

Are there any descrepancies regarding multiple Part A submittals?

G. CLOSURE/POST CLOSURE

1. Any Closed Units: If yes, describe:

Solid Mixing area is in the process of closure

H. COMPLIANCE HISTORY

List past two inspections and enforcement actions (CO, NOV, VL, WL)

Date of inspection	Action type	Date of Action
9-21-88	WL	10-20-88
3-31-89	Enf. Ref.	

I. LIST UNRESOLVED ENFORCEMENT ACTIONS/VIOLATIONS

3-31-89 violations

J. BRIEFLY SUMMARIZE PREVIOUS VIOLATIONS. NOTE IF THEY ARE REPEATS.

See May 11, 1989 memo to ACS file (IB1)

K. LIST ANY ITEMS UNDER COMPLIANCE SCHEDULES WHICH ARE NOT YET COMPLETED OR NEED FIELD VERIFIED

N/A

L. COMMENTS

LDF

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: American Chemical Service, Inc

U.S. EPA I.D. No.: IND 016 360 265

Street: 420 S. Colfax Ave.

City: Griffith State: Ind. Zip Code: 46319

Telephone: (219) 924-4370

Operator: (same)

Street:

City: State: Zip Code:

Telephone:

Owner: (same)

Street:

City: State: Zip Code:

Telephone:

Inspection Date: 9/29/89 Time: 9:00 - AM Weather Conditions: Clear - cold

	Name	Affiliation	Telephone
Inspector(s):	Ted Warner	IDEM (OSHWM)	(317) 232-4536

Facility Representatives: Jim Tarpo and Jim Murphy

	RCRA Status	F-Solvent	LDR Status California List	First Third
Generator	X	X		
Transporter				
Treater	X	X		
Storer	X	X		
Disposer				

Revised 9-26-88

INSPECTION SUMMARY

See field trip report

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	**F-Solvent Wastes**					
1.	F001	X	X	X		
2.	F002	X	X	X		
3.	F003	X	X	X		
4.	F004					
5.	F005	X	X	X		

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. **California List Wastes**

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L					
Cadmium	100 mg/L					
Chromium VI	500 mg/L					
Lead	500 mg/L					
Mercury	20 mg/L					
Nickel	134 mg/L					
Selenium	100 mg/L					
Thallium	130 mg/L					

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
____	____	____	____	____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

____	____	____	____	____

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm	____	____	____	____	____
500 ppm	____	____	____	____	____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

____ Yes ____ No ____ NA

If yes, state reasons for mixing:

_____

_____

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

____	____	____	____	____

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. **First Third Wastes**

Note: (1) The detailed description for waste codes N/A are listed in Appendix C.
(2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*	____	____	____	____	____
F007	____	____	____	____	____
F008	____	____	____	____	____
F009	____	____	____	____	____
F019	____	____	____	____	____
K001*	____	____	____	____	____
K004*	____	____	____	____	____
K008*	____	____	____	____	____
K011	____	____	____	____	____
K013	____	____	____	____	____
K014	____	____	____	____	____
K015*	____	____	____	____	____
K016*	____	____	____	____	____
K017	____	____	____	____	____
K018*	____	____	____	____	____
K019*	____	____	____	____	____
K020*	____	____	____	____	____
K021*	____	____	____	____	____
K022*	____	____	____	____	____
K024*	____	____	____	____	____
K025*	____	____	____	____	____
K030*	____	____	____	____	____
K031	____	____	____	____	____
K035	____	____	____	____	____
K036*	____	____	____	____	____
K037*	____	____	____	____	____
K044*	____	____	____	____	____
K045*	____	____	____	____	____
K046*	____	____	____	____	____

	Gen.	Treat	Store	Disp.	APP Trans.
K047*	____	____	____	____	____
K048*	____	____	____	____	____
K049*	____	____	____	____	____
K050*	____	____	____	____	____
K051*	____	____	____	____	____
K052*	____	____	____	____	____
K060*	____	____	____	____	____
K061*	____	____	____	____	____
K062*	____	____	____	____	____
K069*	____	____	____	____	____
K071*	____	____	____	____	____
K073*	____	____	____	____	____
K083*	____	____	____	____	____
K084	____	____	____	____	____
K085	____	____	____	____	____
K086*	____	____	____	____	____
K087*	____	____	____	____	____
K099*	____	____	____	____	____
K100*	____	____	____	____	____
K101*	____	____	____	____	____
K102*	____	____	____	____	____
K103*	____	____	____	____	____
K104*	____	____	____	____	____
K106*	____	____	____	____	____
P001	____	____	____	____	____
P004	____	____	____	____	____
P005	____	____	____	____	____
P010	____	____	____	____	____
P011	____	____	____	____	____
P012	____	____	____	____	____
P015	____	____	____	____	____
P016	____	____	____	____	____
P018	____	____	____	____	____

	Gen.	Treat	Store	Disp.	APP Trans.
P020	____	____	____	____	____
P030	____	____	____	____	____
P036	____	____	____	____	____
P037	____	____	____	____	____
P039	____	____	____	____	____
P041	____	____	____	____	____
P048	____	____	____	____	____
P050	____	____	____	____	____
P058	____	____	____	____	____
P059	____	____	____	____	____
P063	____	____	____	____	____
P068	____	____	____	____	____
P069	____	____	____	____	____
P070	____	____	____	____	____
P071	____	____	____	____	____
P081	____	____	____	____	____
P082	____	____	____	____	____
P084	____	____	____	____	____
P087	____	____	____	____	____
P089	____	____	____	____	____
P092	____	____	____	____	____
P094	____	____	____	____	____
P097	____	____	____	____	____
P102	____	____	____	____	____
P105	____	____	____	____	____
P108	____	____	____	____	____
P110	____	____	____	____	____
P115	____	____	____	____	____
P120	____	____	____	____	____
P122	____	____	____	____	____
P123	____	____	____	____	____
U007	____	____	____	____	____
U009	____	____	____	____	____

	Gen.	Treat	Store	Disp.	APP Trans.
U010	____	____	____	____	____
U012	____	____	____	____	____
U016	____	____	____	____	____
U018	____	____	____	____	____
U019	____	____	____	____	____
U022	____	____	____	____	____
U029	____	____	____	____	____
U031	____	____	____	____	____
U036	____	____	____	____	____
U037	____	____	____	____	____
U041	____	____	____	____	____
U043	____	____	____	____	____
U044	____	____	____	____	____
U046	____	____	____	____	____
U050	____	____	____	____	____
U051	____	____	____	____	____
U053	____	____	____	____	____
U061	____	____	____	____	____
U063	____	____	____	____	____
U064	____	____	____	____	____
U066	____	____	____	____	____
U067	____	____	____	____	____
U074	____	____	____	____	____
U077	____	____	____	____	____
U078	____	____	____	____	____
U086	____	____	____	____	____
U089	____	____	____	____	____
U103	____	____	____	____	____
U105	____	____	____	____	____
U108	____	____	____	____	____
U115	____	____	____	____	____
U122	____	____	____	____	____
U124	____	____	____	____	____

	Gen.	Treat	Store	Disp.	APP Trans.
U129	____	____	____	____	____
U130	____	____	____	____	____
U133	____	____	____	____	____
U134	____	____	____	____	____
U137	____	____	____	____	____
U151	____	____	____	____	____
U154	____	____	____	____	____
U155	____	____	____	____	____
U157	____	____	____	____	____
U158	____	____	____	____	____
U159	____	____	____	____	____
U171	____	____	____	____	____
U177	____	____	____	____	____
U180	____	____	____	____	____
U185	____	____	____	____	____
U188	____	____	____	____	____
U192	____	____	____	____	____
U200	____	____	____	____	____
U209	____	____	____	____	____
U210	____	____	____	____	____
U211	____	____	____	____	____
U219	____	____	____	____	____
U220	____	____	____	____	____
U221	____	____	____	____	____
U223	____	____	____	____	____
U226	____	____	____	____	____
U227	____	____	____	____	____
U228	____	____	____	____	____
U237	____	____	____	____	____
U238	____	____	____	____	____
U248	____	____	____	____	____
U249	____	____	____	____	____

GEN
ACS

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. <u>BDAT Treatability Group - Treatment Standards Identification</u>

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

   _X_ Yes ____ No ____ NA

   If yes, check the appropriate treatability group.

   ____ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
   ____ Pharmaceutical wastewater containing spent methylene chloride
   _X_ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

   a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

      ____ Yes ____ No _X_ NA

      If yes, specify the method: _____

   b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

      ____ Yes ____ No _X_ NA

      If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

      _____
      _____
      _____

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

____ Yes ____ No __X__ NA

If yes, check the appropriate treatability group.

____ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
____ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater

B. **Waste Analysis**

1. F-Solvent Wastes

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

__X__ Yes ____ No ____ NA

How was this determination made?

- Knowledge of waste

__X__ Yes ____ No

If yes, is any supporting data available for review? Describe how this is adequate. survey form from generators

- TCLP

____ Yes __X__ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

_X_ Yes ____ No ____ NA

If yes, specify the waste stream: Hazardous waste derived fuel

c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

____ Yes _X_ No ____ NA

d. How does the generator test F-solvent waste when a process or waste stream changes? There has been no significant changes

2. California List Wastes

a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

____ Yes ____ No _X_ NA

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

____ Yes ____ No _X_ NA

What type of absorbent is used? ____

Check the types of waste to which absorbent is added.

____ Liquid hazardous waste having a pH less than or equal to 2

____ Liquid hazardous waste containing metals

____ Liquid hazardous waste containing free cyanides

c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

____ Yes ____ No _X_ NA

If yes, is any supporting data available for review? Describe how this is adequate._____

- Testing

____ Yes ____ No _X_ NA

If yes, list test method used: _____

d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

____ Yes ____ No _X_ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No _X_ NA

3. First Third Wastes:

a. Does the generator correctly determine the appropriate treatment standard of the waste?

____ Yes ____ No _X_ NA

Note: The treatment standards for first third wastes are given in Appendix D.

b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

____ Yes ____ No ____ Soft hammer

If yes, specify the waste stream: _____

How was this determination made?

- Knowledge of waste

____ Yes ____ No

If yes, is any supporting data available for review? Describe how this is adequate._____

- TCLP

____ Yes ____ No ___X___ NA

- Total Constituent Analysis

____ Yes ____ No ___X___ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

_____

_____

c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No ___X___ NA

d. How does the generator test the waste when a process or waste stream changes?

_____

_____

_____

C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

___X___ Yes ____ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

___X___ Yes ____ No

b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

___X___ Yes ____ No

c. Does notification contain the following?

EPA Hazardous waste number(s)	X Yes	____ No
Applicable treatment standards	X Yes	____ No
Manifest number	X Yes	____ No
Waste analysis data, if available	X Yes	____ No

Identify off-site treatment or storage facilities: Ashgrove, Louisville, Ne., Marine Shale, Morgan City, La.

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

____ Yes X No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

____ Yes ____ No

f. Does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets treatment standards	____ Yes	____ No

Identify off-site land disposal facilities: _____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

____ Yes ____ No X NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

____ Yes ____ No

i. If yes, does the notification contain the following information?

EPA Hazardous waste number	____ Yes	____ No
The corresponding treatment standards and all applicable prohibitions	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Date the waste is subject to the prohibitions	____ Yes	____ No

j. Does the generator retain copies of all notices and certifications for a period of 5 years?

____ Yes ____ No

D. **Demonstration and Certification -- "Soft Hammer" Wastes** N/A

a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

____ Yes ____ No

b. Has the generator submitted to the Regional Adminstration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?	____ Yes	____ No
Addresses	____ Yes	____ No
Telephone Numbers	____ Yes	____ No
Contact dates	____ Yes	____ No

Attach a copy of the demonstration and certification

c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

____ Yes ____ No

If yes, attach a copy of written discussion.

d. Does the generator ship his waste off-site for treatment?

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

_____

_____

e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

_____ Yes _____ No

f. Does the generator provide certification with each subsequent shipment of wastes?

_____ Yes _____ No

g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i)	EPA Hazardous waste number	_____ Yes	_____ No
(ii)	Manifest number	_____ Yes	_____ No
(iii)	Waste analysis data, if available	_____ Yes	_____ No

h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

_____ Yes _____ No

E. **Treatment Using RCRA 264/265 Exempt Units or Processes**
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ Yes _____No

If yes, list types of waste treatment units and processes:

_____

_____

TSD
ACS

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent	X Yes	____ No	____ NA
o California List	____ Yes	____ No	X NA
o First Third	____ Yes	____ No	X NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

X Yes ____ No

a. What date was the waste analysis plan last revised? Aug. 1988

b. Are analyses conducted on-site or off-site?

X On-site ____ Off-site

Identify off-site lab: _____

c. Is F-solvent waste analyzed using TCLP?

____ Yes ____ No X NA

d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

____ Yes ____ No X NA

Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

e. Describe the frequency of sampling: _____

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

X Yes ____ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

X Yes ____ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

X Tanks
X Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

X Yes ____ No ____ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

X Yes ____ No

5. Do operating records agree with container labeling?

X Yes ____ No ____ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

X Yes ____ No

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

____ Yes ___X___ No ____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

____ Yes ____ No

If yes, state how: _____

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

___X___ Yes ____ No ____ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

___X___ Yes ____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

___X___ Yes ____ No ____ NA

Operating record

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

___X___ Yes ____ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:
Filtration, settling, grinding, distillation and blending

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

X Yes ____ No Incineration

4. Is dilution used as a substitute for treatment?

____ Yes X No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

____ Yes ____ No N/A

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

____ Yes ____ No X NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

____ Yes ____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets the treatment standards	____ Yes	____ No

Identify off-site disposal facilities: _____

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

____ Yes ____ No ___X NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

____ Yes ____ No

D. Treatment in Surface Impoundments

N/A

1. Are restricted wastes placed in surface impoundments for treatment?

____ Yes ____ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

____ Yes ____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

____ Yes ____ No ____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

____ Yes ____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

____ Yes ____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

_____

_____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

a. If yes, are sludge and supernatant removed adequately on an annual basis?

_____ Yes _____ No

b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

_____

_____

E. Land Disposal

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

   ____ Yes ✓ No

   Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

   If yes, specify which units and what wastes each unit has received: _____

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring? N/A

   ____ Yes ____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

   ____ Yes ____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

   ____ Yes ____ No

   If yes, at what frequency? _____

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

   ____ Yes ____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

   ____ Yes ____ No

7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

____ Yes ____ No ____ NA

8. What is the volume of the restricted wastes disposed of to date?

_____

_____

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

____ Yes ____ No ____ NA

RECEIVED
6/18/89

JLB

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: American Chemical Services, Inc.

U.S. EPA I.D. No.: IND 016 360 265

Street: 420 South Colfax Ave.

City: Griffith **State:** Ind. **Zip Code:** 46319

Telephone: 219/ 924-4370

Operator: (same)

Street:

City: **State:** **Zip Code:**

Telephone:

Owner: (same)

Street:

City: **State:** **Zip Code:**

Telephone:

Inspection Date: 3/13/89 **Time:** 9:30 - Am **Weather Conditions:** Cold, 40°F, Light Snow

	Name	Affiliation	Telephone
Inspectors:	Ted Warner	IDEM (OSHWM)	317/232-4518

Facility Representatives: Mr. Jim Murphy

	RCRA Status	F-Solvent	LDR Status California List	First Third
Generator	✓	✓		
Transporter				
Treater	✓	✓		
Storer	✓	✓		
Disposer				

Revised 9-26-88

INSPECTION SUMMARY

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	**F-Solvent Wastes**					
1.	F001	✓	✓	✓		
2.	F002	✓	✓	✓		
3.	F003	✓	✓	✓		
4.	F004					
5.	F005	✓	✓	✓		

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

N/A

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L					
Cadmium	100 mg/L					
Chromium VI	500 mg/L					
Lead	500 mg/L					
Mercury	20 mg/L					
Nickel	134 mg/L					
Selenium	100 mg/L					
Thallium	130 mg/L					

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
____	____	____	____	____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

____	____	____	____	____

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm	____	____	____	____	____
500 ppm	____	____	____	____	____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

____ Yes ____ No ____ NA

If yes, state reasons for mixing:

_____

_____

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

____	____	____	____	____

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. **First Third Wastes** N/A

Note: (1) The detailed description for waste codes are listed in Appendix C.
(2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*	____	____	____	____	____
F007	____	____	____	____	____
F008	____	____	____	____	____
F009	____	____	____	____	____
F019	____	____	____	____	____
K001*	____	____	____	____	____
K004*	____	____	____	____	____
K008*	____	____	____	____	____
K011	____	____	____	____	____
K013	____	____	____	____	____
K014	____	____	____	____	____
K015*	____	____	____	____	____
K016*	____	____	____	____	____
K017	____	____	____	____	____
K018*	____	____	____	____	____
K019*	____	____	____	____	____
K020*	____	____	____	____	____
K021*	____	____	____	____	____
K022*	____	____	____	____	____
K024*	____	____	____	____	____
K025*	____	____	____	____	____
K030*	____	____	____	____	____
K031	____	____	____	____	____
K035	____	____	____	____	____
K036*	____	____	____	____	____
K037*	____	____	____	____	____
K044*	____	____	____	____	____
K045*	____	____	____	____	____
K046*	____	____	____	____	____

	Gen.	Treat	Store	Disp.	APP Trans.
K047*	____	____	____	____	____
K048*	____	____	____	____	____
K049*	____	____	____	____	____
K050*	____	____	____	____	____
K051*	____	____	____	____	____
K052*	____	____	____	____	____
K060*	____	____	____	____	____
K061*	____	____	____	____	____
K062*	____	____	____	____	____
K069*	____	____	____	____	____
K071*	____	____	____	____	____
K073*	____	____	____	____	____
K083*	____	____	____	____	____
K084	____	____	____	____	____
K085	____	____	____	____	____
K086*	____	____	____	____	____
K087*	____	____	____	____	____
K099*	____	____	____	____	____
K100*	____	____	____	____	____
K101*	____	____	____	____	____
K102*	____	____	____	____	____
K103*	____	____	____	____	____
K104*	____	____	____	____	____
K106*	____	____	____	____	____
P001	____	____	____	____	____
P004	____	____	____	____	____
P005	____	____	____	____	____
P010	____	____	____	____	____
P011	____	____	____	____	____
P012	____	____	____	____	____
P015	____	____	____	____	____
P016	____	____	____	____	____
P018	____	____	____	____	____

	Gen.	Treat	Store	Disp.	APP Trans.
P020	____	____	____	____	____
P030	____	____	____	____	____
P036	____	____	____	____	____
P037	____	____	____	____	____
P039	____	____	____	____	____
P041	____	____	____	____	____
P048	____	____	____	____	____
P050	____	____	____	____	____
P058	____	____	____	____	____
P059	____	____	____	____	____
P063	____	____	____	____	____
P068	____	____	____	____	____
P069	____	____	____	____	____
P070	____	____	____	____	____
P071	____	____	____	____	____
P081	____	____	____	____	____
P082	____	____	____	____	____
P084	____	____	____	____	____
P087	____	____	____	____	____
P089	____	____	____	____	____
P092	____	____	____	____	____
P094	____	____	____	____	____
P097	____	____	____	____	____
P102	____	____	____	____	____
P105	____	____	____	____	____
P108	____	____	____	____	____
P110	____	____	____	____	____
P115	____	____	____	____	____
P120	____	____	____	____	____
P122	____	____	____	____	____
P123	____	____	____	____	____
U007	____	____	____	____	____
U009	____	____	____	____	____

	Gen.	Treat	Store	Disp.	APP Trans.
U010	____	____	____	____	____
U012	____	____	____	____	____
U016	____	____	____	____	____
U018	____	____	____	____	____
U019	____	____	____	____	____
U022	____	____	____	____	____
U029	____	____	____	____	____
U031	____	____	____	____	____
U036	____	____	____	____	____
U037	____	____	____	____	____
U041	____	____	____	____	____
U043	____	____	____	____	____
U044	____	____	____	____	____
U046	____	____	____	____	____
U050	____	____	____	____	____
U051	____	____	____	____	____
U053	____	____	____	____	____
U061	____	____	____	____	____
U063	____	____	____	____	____
U064	____	____	____	____	____
U066	____	____	____	____	____
U067	____	____	____	____	____
U074	____	____	____	____	____
U077	____	____	____	____	____
U078	____	____	____	____	____
U086	____	____	____	____	____
U089	____	____	____	____	____
U103	____	____	____	____	____
U105	____	____	____	____	____
U108	____	____	____	____	____
U115	____	____	____	____	____
U122	____	____	____	____	____
U124	____	____	____	____	____

	Gen.	Treat	Store	Disp.	APP Trans.
U129	____	____	____	____	____
U130	____	____	____	____	____
U133	____	____	____	____	____
U134	____	____	____	____	____
U137	____	____	____	____	____
U151	____	____	____	____	____
U154	____	____	____	____	____
U155	____	____	____	____	____
U157	____	____	____	____	____
U158	____	____	____	____	____
U159	____	____	____	____	____
U171	____	____	____	____	____
U177	____	____	____	____	____
U180	____	____	____	____	____
U185	____	____	____	____	____
U188	____	____	____	____	____
U192	____	____	____	____	____
U200	____	____	____	____	____
U209	____	____	____	____	____
U210	____	____	____	____	____
U211	____	____	____	____	____
U219	____	____	____	____	____
U220	____	____	____	____	____
U221	____	____	____	____	____
U223	____	____	____	____	____
U226	____	____	____	____	____
U227	____	____	____	____	____
U228	____	____	____	____	____
U237	____	____	____	____	____
U238	____	____	____	____	____
U248	____	____	____	____	____
U249	____	____	____	____	____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. **BDAT Treatability Group - Treatment Standards Identification**

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

   ✓ Yes ____ No ____ NA

   If yes, check the appropriate treatability group.

   ____ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
   ____ Pharmaceutical wastewater containing spent methylene chloride
   ✓ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

   a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

      ____ Yes ____ No ✓ NA

      If yes, specify the method: _____

   b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

      ____ Yes ____ No ✓ NA

      If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

      _____
      _____
      _____

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

____ Yes ____ No ✓ NA

If yes, check the appropriate treatability group.

____ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
____ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater

B. <u>Waste Analysis</u>

1. F-Solvent Wastes

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

✓ Yes ____ No ____ NA

How was this determination made?

- Knowledge of waste

✓ Yes ____ No

If yes, is any supporting data available for review? Describe how this is adequate. survey form from generators

- TCLP

____ Yes ✓ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

✓ Yes ____ No ____ NA

If yes, specify the waste stream: Hazardous waste derived fuel

c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

____ Yes ✓ No ____ NA

d. How does the generator test F-solvent waste when a process or waste stream changes? There has been no significant changes

2. California List Wastes

a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

____ Yes ____ No ✓ NA

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

____ Yes ____ No ✓ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

____ Liquid hazardous waste having a pH less than or equal to 2

____ Liquid hazardous waste containing metals

____ Liquid hazardous waste containing free cyanides

c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

____ Yes ____ No ✓ NA

If yes, is any supporting data available for review? Describe how this is adequate._____

- Testing

____ Yes ____ No ✓ NA

If yes, list test method used: _____

d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

____ Yes ____ No ✓ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No ✓ NA

3. First Third Wastes:

a. Does the generator correctly determine the appropriate treatment standard of the waste?

____ Yes ____ No ✓ NA

Note: The treatment standards for first third wastes are given in Appendix D.

b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

____ Yes ____ No ____ Soft hammer

If yes, specify the waste stream: _____

How was this determination made?

- Knowledge of waste

____ Yes ____ No

If yes, is any supporting data available for review? Describe how this is adequate._____

- TCLP

____ Yes ____ No ____ NA

- Total Constituent Analysis

____ Yes ____ No ____ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

_____

_____

c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No ____ NA

d. How does the generator test the waste when a process or waste stream changes?

_____

_____

_____

C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

✓ Yes ____ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

✓ Yes ____ No

b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

✓ Yes ____ No

c. Does notification contain the following?

EPA Hazardous waste number(s)	✓ Yes	____ No
Applicable treatment standards	✓ Yes	____ No
Manifest number	✓ Yes	____ No
Waste analysis data, if available	✓ Yes	____ No

Identify off-site treatment or storage facilities: Ashgrove, Louisville Ne. Foreman Ark.

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

____ Yes ✓ No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

____ Yes ____ No

f. Does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets treatment standards	____ Yes	____ No

Identify off-site land disposal facilities: _____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

____ Yes ____ No ✓ NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

____ Yes ____ No

i. If yes, does the notification contain the following information?

EPA Hazardous waste number	____ Yes	____ No
The corresponding treatment standards and all applicable prohibitions	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Date the waste is subject to the prohibitions	____ Yes	____ No

j. Does the generator retain copies of all notices and certifications for a period of 5 years?

____ Yes ____ No

D. <u>Demonstration and Certification -- "Soft Hammer" Wastes</u> N/A

a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

____ Yes ____ No

b. Has the generator submitted to the Regional Adminstration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?	____ Yes	____ No
Addresses	____ Yes	____ No
Telephone Numbers	____ Yes	____ No
Contact dates	____ Yes	____ No

Attach a copy of the demonstration and certification

c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

____ Yes ____ No

If yes, attach a copy of written discussion.

d. Does the generator ship his waste off-site for treatment?

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

_____

_____

e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

_____ Yes _____ No

f. Does the generator provide certification with each subsequent shipment of wastes?

_____ Yes _____ No

g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i)	EPA Hazardous waste number	_____ Yes	_____ No
(ii)	Manifest number	_____ Yes	_____ No
(iii)	Waste analysis data, if available	_____ Yes	_____ No

h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

_____ Yes _____ No

E. <u>Treatment Using RCRA 264/265 Exempt Units or Processes</u>
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ Yes _____No

If yes, list types of waste treatment units and processes:

_____

_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. <u>General Facility Standards</u>

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

   o F-solvent ✓ Yes ____ No ____ NA

   o California List ____ Yes ____ No ✓ NA

   o First Third ____ Yes ____ No ✓ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

   ✓ Yes ____ No

   a. What date was the waste analysis plan last revised? Aug. 1988

   b. Are analyses conducted on-site or off-site?

   ✓ On-site ____ Off-site

   Identify off-site lab: _____

   c. Is F-solvent waste analyzed using TCLP?

   ____ Yes ____ No ✓ NA

   d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

   ____ Yes ____ No ✓ NA

   Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

   e. Describe the frequency of sampling: _____

Ashgrove Cement
Louisville, Ne.

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

____ Yes ____ No

B. <u>Storage</u> (268.50)

1. Are restricted wastes stored on-site?

✓ Yes ____ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

✓ Tanks
✓ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

✓ Yes ____ No ____ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

✓ Yes ____ No

5. Do operating records agree with container labeling?

✓ Yes ____ No ____ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

✓ Yes ____ No

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

____ Yes ✓ No ____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

____ Yes ____ No

If yes, state how: [redacted]

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

✓ Yes ____ No ____ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

✓ Yes ____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

✓ Yes ____ No ____ NA

Operating record

C. **Treatment**

1. Does the facility treat restricted wastes other than in surface impoundments?

✓ Yes ____ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes: Filtration, settling, grinding, distillation and blending

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

   ✓ Yes ____ No

4. Is dilution used as a substitute for treatment?

   ____ Yes ✓ No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

   ____ Yes ____ No N/A

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

   ____ Yes ____ No X NA

   If yes, does the treatment facility provide notification and certification to the disposal facility?

   ____ Yes ____ No

   If yes, does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets the treatment standards	____ Yes	____ No

Identify off-site disposal facilities: _____

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

____ Yes ____ No ✓ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

____ Yes ____ No

D. <u>Treatment in Surface Impoundments</u>

N/A

1. Are restricted wastes placed in surface impoundments for treatment?

____ Yes ____ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

____ Yes ____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

____ Yes ____ No ____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

____ Yes ____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

____ Yes ____ No

N/A

TSD

6. Provide the frequency of analyses conducted on treatment residues: _____

_____

_____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

a. If yes, are sludge and supernatant removed adequately on an annual basis?

_____ Yes _____ No

b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

_____

_____

E. Land Disposal

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

   ____ Yes ✓ No

   Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

   If yes, specify which units and what wastes each unit has received: _____

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring? N/A

   ____ Yes ____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

   ____ Yes ____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

   ____ Yes ____ No

   If yes, at what frequency? _____

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

   ____ Yes ____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

   ____ Yes ____ No

7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

____ Yes ____ No ____ NA

8. What is the volume of the restricted wastes disposed of to date?

_____

_____

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

____ Yes ____ No ____ NA

9UB

PREINSPECTION FILES AUDIT
CHECKLIST

DATE: 3/29/89

BY: Ted Warner

COMPANY: American Chemical Services, Inc.

LOCATION: 420 South Colfax, Griffith

I.D.#: IND/016/3601265

Type of inspection (G)---T---(TSD)----Closure---Complaint---Other(please specify)

A. GENERAL

		YES	NO	NA
1.	FEDERAL NOTIFICATION ON FILE?	✓	—	—
2.	FEDERAL PART A ON FILE?	✓	—	—
3.	CLOSURE PLAN REVIEWED?	✓	—	—
4.	CONTINGENCY PLAN REVIEWED?	✓	—	—
5.	BIENNIAL REPORT REVIEWED?	✓	—	—
*6.	PART B PERMIT REVIEWED?	✓	—	—

*(Note any Special Permit Conditions)

Comments:

B. NOTIFICATION DATA (Notify type, waste codes listed, etc.)

F001, F002, F003, F005, D001

C. LAND DISPOSAL INFORMATION

1. List Waste and Land Disposal Facility

no current information on file

2-7

D. LIST POSSIBLE WASTE STREAMS NOT LISTED ON BIENNIAL REPORT

E. LIST WASTE MANAGEMENT PRACTICES WHICH MAY REQUIRE A PERMIT

"Fire Pond" possible surface impoundment

F. FEDERAL PART A (Handling Codes), OR PART B PERMIT

	Code	Amount	Unit of Measure	
1.	S01	16,500	G	300(55gal.) cont.
2.	S02	320,700 ~~264,900~~	G	Dec 10, 1987 Part A Change
3.	* T04	50,000	G	
4.				* Solvent and Fuel Recycling Capacity
5.				

Are there any descrepancies regarding multiple Part A submittals?

G. CLOSURE/POST CLOSURE

1. Any Closed Units: If yes, describe:

Solids Mixing Area is in the process of closure

H. COMPLIANCE HISTORY

List past two inspections and enforcement actions (CO, NOV, VL, WL)

Date of inspection	Action type	Date of Action
3-3-88	LOC	4-11-88
9-21-88	WL	10-20-88

I. LIST UNRESOLVED ENFORCEMENT ACTIONS/VIOLATIONS

N/A

J. BRIEFLY SUMMARIZE PREVIOUS VIOLATIONS. NOTE IF THEY ARE REPEATS.

N/A

K. LIST ANY ITEMS UNDER COMPLIANCE SCHEDULES WHICH ARE NOT YET COMPLETED OR NEED FIELD VERIFIED

N/A

L. COMMENTS

1988 Closure Cost Estimates were provided on Oct. 13, 1988

Aug. 25, 1988 Work Plan for RI/FS

1-31-89 EPA - RCRA 3008(a)(2) Notice (financial)

Jan 17-89 NOV - Land Ban - 268.7(b) Testing

1985 Part B review (shortcomings

1-3-89 Petition for Review + Stay of order Dated 12-9-88 (closure)

0978M
kaw
8/4/88

TSD - RCRA INSPECTION REPORT

EPA ID # IND 016 360 265 NAME American Chemical Services, Inc.

MAILING ADDRESS: P.O. Box 190
Griffith, Ind., 46319

LOCATION ADDRESS: 420 South Colfax Ave.
Griffith, Ind. 46319

CONTACT: Jim Tarpo PHONE: 219/924-4370

OWNERSHIP: American Chemical Service, Inc. COUNTY: Lake

STATUS CODE: 1 1=Active 3=Dead Mail 4=PCB handler
6=non-handler 2=Obsolete ID # 9=Superfund site
5=Out of business

ACTIVITY: (This should reflect the actual functioning of the facility)

LQG ✓ SQG ____ CEG ____ TRANSPORTER ____ TSD ✓ UI ____

TRANSPORTERS: Air ____ Rail ____ Hwy ____ Water ____ Other ____

HAZARDOUS WASTE FUEL : Gen mktg burner X other mktr ____ burner ____
OFF SPEC USED OIL FUEL : Gen mktg burner ____ other mktr ____ burner ____
SPEC USED OIL FUEL MKTR :
BURNING DEVISE : Util boiler ____ Indus boiler X Indus furn ____

Person(s) interviewed:	Title:	Telephone:
Jim Tarpo	President	219-924-4370
Jim Murphy	Plant Manager	"
* page (5)		

Inspector(s):	Agency:	Telephone:
Ted Warner	IDEM (OSHWM)	317/232-4518

Date of inspection: 3-31-89 Time of inspection: 9:30 AM

Installation Processes by Process Code (EPA Form 3510-3)

S01	✓ Container storage	T03	___ Incinerator treatment
S02	✓ Tank storage	T04	✓ Other treatment
S03	✓ Waste pile storage	D79	___ Injection well disposal
S04	___ Surface impoundment storage	D80	___ Landfill disposal
T01	___ Tank treatment	D81	___ Land application disposal
T02	___ Surface impoundment treatment	D83	___ Surface impoundment disposal

If Part A process codes are listed above as T04 please describe the process involved below:

S03 not on Part A - Area was formerly used as a solids mixing area.

1) Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application. (HWIMS 610)
S03

2) Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

3) Type of Operation, Products Manufactured, Processes Utilized, Size of Operation, Concentrate on processes that produce waste (hazardous or non-hazardous):

ACS manufactures organic chemicals. The facility also blends fuel additives and solvents. ACS hazardous waste activities include solvent recovery and the production of hazardous waste derived fuel. ACS's processes include filtration, distillation, settling, grinding and blending.

4) If any of the wastes are managed in the manners listed below, please check those areas and utilize the provided appendices.

		YES	NO
A)	Waste Oil Fuel - Appendix A	___	___
B)	Lead Acid Batteries - Appendix B	___	___
C)	Hazardous Waste Fuel - Appendix C	✓	___
D)	Precious Metals - Appendix D	___	___
E)	Use Constituting Disposal - Appendix E	___	___
F)	Tanks	✓	___
G)	Use and Management of Containers	✓	___

		YES	NO
H)	Generator Accumulation Appendix	✓	
I)	Waste Pile	✓	
J)	Surface Impoundment		
K)	Landfill		

5) Hazardous Waste Streams/EPA #

	Source	Rate	Disposition
1. Paint Solids (D001)	Solids from Drums		
2. Charcoal Filters, Drum liners and clothing (D001)	"	app. 4,000 gal/mth	Ash Grove Cement Kiln (Louisville, Ne.)
3. Still Bottoms from assorted "F" solvent Waste and (D001) waste	Solids		Hazardous Waste Fuel Blending

6) List all wastes not listed above.

Waste	Process Generating Waste	Rate	Disposition
1. [illegible]		(2) 20 yd³ Box/wk	(Gary development) Landfill

7) If the company claims a reuse or reclaim exemption please include the following information:

	Waste Type	Generation Rate	How reclaimed & by Who	Quantity stored on Site
A.				
B.				

8) Hazardous Waste

On-Site	Amount	How Stored	Comments
D001-F001-2-3-5	315+31 in truck	S01	* Page 5 & #9 page 4
" " " " "	166,521 gal.	S02	3/30/89 (report attached)

9) Has the capacity of the storage areas listed on the Part A exceeded that allowed? List the type and amount of actual storage capacity overages.
329 IAC 3-38-2 (HWIMS 610)

* Mr. Jim Murphy and I counted 315 (55) gal. containers located in the container storage and (see page 5)

10) Indicate any TSD activities which have been omitted from or are not clear on the facility map (for the purpose of determining if expansion has occured)
(40 CFR 270.13 and 329 IAC 3-34-4) (HWIMS 610)

Waste pile, which was formerly a solids mixing area.

11) Is the Biennial Report Accurate? yes

12) Note any non-RCRA Violations (Open Dumping, Dumping in City Sewer Without Pretreatment Program, OSHA, etc.) N/A

13) Additional Comments:

John Murphy - RCRA Coor:

Mr. Dan Bakk and Mr. Rick Hersemann U.S. EPA Enforcement representatives conducted an oversight inspection during my visit

Page 4 # 9) process area. Mr. Murphy open (15) containers that had less than one half of the capacity filled. I also noted that there were (4) covered highway trailers backed up to the process and storage area. I checked the label of one of the containers in an open trailer. The label indicated manifest number 1N838261 and F001 hazardous waste. During my record review I noted in the operating record that on March 28, 1989 a total of 31 (55) gal containers (1705) gals. of F001 hazardous waste was delivered to ACS.

General Facility Standards (paperwork)

		OK	DF	NI	NA
1)	Has the Regional Administrator/Environmental Management Board been notified regarding:				
a.	Receipt of hazardous waste from a foreign source? 40 CFR 265.12(a) (329 IAC 3-16-3) (HWIMS 300)	—	—	—	✓
b.	Facility expansion? 40 CFR 270.72(b) (329 IAC 3-38-3) (HWIMS 610)	—	—	—	✓
c.	Change of owner or operator? 40 CFR 265.12(b) (329 IAC 3-16-3) (HWIMS 300)	—	—	—	✓

1) b. Tank 1002 - under interim status

2) General Waste Analysis: (HWIMS 310)

		OK	DF	NI	NA
a.	Has the owner or operator made a detailed chemical and physical analysis of the waste either through testing of knowledge of the process? 40 CFR 265.13(a)1 (329 IAC 3-16-4)	✓	—	—	—
b.	Does the owner or operator have a detailed waste analysis plan on file at the facility? 40 CFR 265.13(b) (329 IAC 3-16-4)	✓	—	—	—
	Does the waste analysis plan contain:				
	1. parameters (and rationale for their choice)	✓	—	—	—
	2. test methods	✓	—	—	—
	3. sampling method for representative sample	✓	—	—	—
	4. frequency of analysis (and rationale)	✓	—	—	—
	5. off-site only: waste analysis from generators	✓	—	—	—
	6. Additional waste analysis needed (when a change in waste type or process occurs)				
	a. 265.193 (329 IAC 3-24-3) Tanks (see above)	✓	—	—	—
	b. 265.225 (329 IAC 3-25-4) Impoundment (same as above)	—	—	—	—
	c. 265.252 (329 IAC 3-26-3) Waste Pile (same as above)	—	—	—	—
	d. 265.273 (329 IAC 3-27-3) Land Treatment (same as above)	—	—	—	✓
	e. 265.341 (329 IAC 3-29-2) Incinerators (same as above)	—	—	—	✓

	OK	DF	NI	NA
f. 265.375 (329 IAC 3-30-3) Thermal Treatment (same as above)				✓
g. 265.402 (329 IAC 3-31-3) Other Treatment (same as above)				✓

6. c. former solids mixing area - not used since 1984

c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? 40 CFR 265.13(c) (329 IAC 3-16-4) — ✓

d. Is the waste analysis plan followed? yes

3) Owner or Operator Inspections: (HWIMS 320)

a. Does the owner or operator inspect the facility for deterioration, malfunctions, operator errors, and discharges of hazardous waste that may affect human health or the environment? 40 CFR 265.15(a) (329 IAC 3-16-6) — ✓

b. Does the owner or operator have an inspection schedule at the facility? 40 CFR 265.15(b)2 (329 IAC 3-16-6) — ✓

c. If so, does the schedule address the inspection of the following items: 40 CFR 265.15(b)1 (329 IAC 3-16-6)

i. monitoring equipment? — ✓

ii. safety and emergency equipment? area "C" — ✓

iii. security devices (including fences)? — ✓

iv. operating and structural equipment (ie. dikes, pumps, etc.)? — ✓

v. type of problems to be looked for during the inspection (e.g. leaky fittings, defective pump, etc.)? 40 CFR 265.15(b)(2) (329 IAC 3-16-6) — ✓

	OK	DF	NI	NA
vi. inspection frequency (based upon the possible deterioration rate of the equipment)? 40 CFR 265.15(b)(4) (329 IAC 3-16-6)	✓			

vii. Must include:

1. Weekly container storage? (See 265.174) (329 IAC 3-23-5)	✓			
2. Daily and Weekly Tank Storage? (See 265.194) (329 IAC 3-24-4)	✓			
3. Daily freeboard and weekly dike inspection for surface impoundments? (See 265.226) (329 IAC 3-25-5)	✓			
4. Landfills, Thermal treatment, Chemical, Physical, and Biological treatment should be inspected as determined by deterioration rate and daily at loading and unloading areas (where spills are likely) [See 265.15(b)(4) (329 IAC 3-16-6)]				✓

d. Does Owner or Operator follow the written inspection schedule as outlined? 265.15(b)(1) (329 IAC 3-16-6)	✓			
e. Are areas subject to spills inspected daily when in use? 265.15(b)(4) (329 IAC 3-16-6)	✓			

f. Does the owner or operator maintain an inspection log or summary of owner or operator inspections? 40 CFR 265.15(d) (329 IAC 3-16-6)	✓			

g. Does the inspection log contain the following information: 40 CFR 265.15(d) (329 IAC 3-16-6)

i. the date and time of the inspection?	✓			
ii. the name of the inspector?	✓			

	OK	DF	NI	NA
iii. a notation of the observations made?	✓			
iv. the date and nature of any repairs or remedial actions?	✓			

4) Do personnel training records include: (HWIMS 330)

	OK	DF	NI	NA
a. Job titles for the positions related to HWM 40 CFR 265.16(d)1 (329 IAC 3-16-7)	✓			
b. The name of the employees filling each job title? 40 CFR 265.16(d)(1) (329 IAC 3-16-7)	✓			
c. Job descriptions including the required skills, education, or other qualifications and the duties of the personnel assigned to the position? 40 CFR 265.16(d)2 (329 IAC 3-16-7)	✓			

Check categories for which job titles/descriptions are available (please include the supervisors of each category in that category when reviewing documents).

Emergency coordinator ✓ Training coordinator ✓ Emergency response personnel ✓
Inspectors ✓ Material handlers ✓ Container labelers ✓ Manifesters ✓
Recordkeepers ✓

	OK	DF	NI	NA
d. Description of both introductory and continuing training required for each job? 40 CFR 265.16(d)(3) (329 IAC 3-16-7)	✓			

Describe in general the type of training program in use at the facility.

	OK	DF	NI	NA
e. Records of training required in (d)? 40 CFR 265.16(d)4 (329 IAC 3-16-7)	✓			

f. Did facility personnel receive the required training including:

	OK	DF	NI	NA
i) classroom or on the job	✓			
ii) within 6 months of hire	✓			
iii) annual review of training?	✓			
g. Are all training records maintained for current personnel and for at least three years for former employees? 40 CFR 265.16(e) [329 IAC 3-16-7(e)]	✓			

CONTINGENCY PLAN AND EMERGENCY PROCEDURES (HWIMS 350)

1) Does the Contingency Plan contain the following information:

	OK	DF	NI	NA
a. The actions facility personnel must take to comply with 265.51 (3-18-2) and 265.56 (3-18-7) in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable).	✓			
A. A description of arrangements agreed by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services. 329 IAC 3-18-3	✓			
i. Names, addresses, and phone numbers of all persons qualified to act as emergency coordinators?	✓			
ii. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? 40 CFR 265.52(e) (329 IAC 3-18-3)	✓			

	OK	DF	NI	NA
iii. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must decribe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.) 40 CFR 265.52(f) (329 IAC 3-18-3)	✓			
2) Emergency Coordinator:				
a. Is the facility Emergency Coordinator identified? 40 CFR 265.52(d) (329 IAC 3-18-3)	✓			
b. Is coordinator familiar with all aspects of site operation and emergency procedures? 40 CFR 265.55 (329 IAC 3-18-6)	✓			
c. Does Emergency Coordinator have the authority to carry out the Contingency Plan? 40 CFR 265.55 (329 IAC 3-18-6)	✓			

2/ a. Jim Murphy

Preparedness and Prevention

	OK	DF	NI	NA
1) Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility? 40 CFR 265.37 (329 IAC 3-17-7) (HWIMS 340)	✓			
2) Are copies of the Contingency Plan available at the site and local emergency organizations? 40 CFR 265.53 (329 IAC 3-18-4) (HWIMS 350)	✓			
3) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56 (329 IAC 3-18-7)? (HWIMS 350)				N/A ✓

1) sign off forms from police and fire departments

MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING:

		OK	DF	NI	NA
1)	Use of Manifest System: (HWIMS 360)				
a.	Does the facility follow the procedures listed in 265.71 (3-19-2) for processing each manifest? (Particularly sending a copy of the signed manifest back to thegenerator within 30 days after delivery.)	✓			
b.	Are records of past shipments retained for three (3) years? 40 CFR 265.71(b)5 (329 IAC 3-19-2)	✓			
2)	Does the owner or operator meet requirements regarding manifest discrepancies? (Off-site facilities only) 40 CFR 265.72 (329 IAC 3-19-3)				✓
3)	Unmanifested Waste Reports: (applies only to Off-site facilities)				
a.	Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 (3-8-1) without a manifest or shipping paper? 40 CFR 265.76 (329 IAC 3-19-7)	✓			
b.	If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type and date received for each unmanifested hazardous waste shipment.				
c.	Has the facility submitted 8700-13B (unmanifested waste report)?				
4)	Closure/Post Closure				
a.	Is the closure plan available for inspection? 40 CFR 265.112(a) (329 IAC 3-21-3) (HWIMS 390)	✓			
b.	Is the post-closure plan available for inspection? (for disposal facilities only) 40 CFR 265.118(a) (329 IAC 3-21-8) (HWIMS 390)				✓
c.	Has the closure cost and post closure cost estimate been revised annually to account for inflation. (HWIMS 400)	✓			

		OK	DF	NI	NA
5)	Operating Record: (HWIMS 370)				
a.	Does owner or operator have a operating record? 40 CFR 265.73(a)	✓			
b.	Does the owner or operator maintain an operating record that contains the following information?				
i.	The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR 265 Appendix I (329 IAC 3-32-2)? 40 CFR 265.73(b)(1) (329 IAC 3-19-4)				

Summarize how the facility tracks the method and date of TSD activity.

Material is not Treatment coded until it is analyzed.

ii.	The location and quantity of each hazardous waste within the facility? (This information shall be cross referenced to a specific manifest number if the waste was accompanied by manifest.) 40 CFR 265.73(b)(2) (329 IAC 3-19-4)	✓			

Summarize how the facility tracks the location and quantity of waste.

(copy attached)

iii.	A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross referenced to specific manifest number, if accompanied by a manifest.) 40 CFR 265.73(b)(2) (329 IAC 3-19-4)				✓
iv.	Records and results of all waste analyses, trial tests, monitoring data, and operating inspections? 40 CFR 265.73(b)(3)(5)(6) (329 IAC 3-19-4)	✓			
v.	Reports detailing all incidents that required implementation of the Contingency Plan? 40 CFR 265.73(b)(4) (329 IAC 3-19-4)				N/A
vi.	All closure and post closure costs as applicable? 40 CFR 265.73(b)(7) (329 IAC 3-19-4)	✓			

5) b. vi. cost for closure was update for 1988

GROUNDWATER MONITORING

40 CFR Subpart F

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

		OK	DF	NI	NA
1)	Has the owner or operator of the facility implemented a groundwater monitoring system? 40 CFR 265.90(a) (329 IAC 3-20-1) (HWIMS 380)	—	—	—	✓
2)	Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in 265.90(d) (329 IAC 3-20-1)? (HWIMS 380)	—	—	—	✓

Wells { 4 shallow and 1 deep - ACS - onsite
HEPA at Disposal site

APPENDIX GN

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Manifest Requirements: (HWIMS 110)	OK	DF	NI	NA
1) Does the operator have copies of the manifest available for review? 40 CFR 262.40 (329 IAC 3-10-1)	✓			
2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period	app. 48			
3) Do the manifest forms examined contain the following information. 40 CFR 262.21 (329 IAC 3-8-1)				
a. Manifest document number? EPA ID No. + Unique 5 digit No.? (A sequential number for all manifests before September 20, 1984, and a five digit unique number after September 20, 1984.)	✓			
b. Name, mailing address, telephone number, and EPA ID number of generator?	✓			
c. Name, telephone number (3-14-3) and EPA ID Number of Transporter(s)?	✓			
d. Name, Address, telephone number (3-14-3) and EPA ID Number of designated permitted facility?	✓			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
f. The total quantity of waste(s) and the type and number of containers loaded?	✓			
g. Required certification?	✓			
h. Required signatures?	✓			
i. EPA hazardous waste number (3-14-3)?	✓			

2/per week

4) Reportable exceptions:
40 CFR 262.42 (329 IAC 3-10-3) (HWIMS 180)

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. none

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) (329 IAC 3-10-3) to the Regional Administrator.

INTERNATIONAL SHIPMENTS: (HWIMS 190)

	OK	DF	NI	NA
1) Has the installation imported or exported hazardous waste? 40 CFR 262.50 (329 IAC 3-11-1) (If answered Yes, complete the following as applicable.)				✓
a. Exporting hazardous waste; has a generator:				
i. Notified the administrator in writing?				
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
iii. Met the Manifest requirements?				
b. Importing hazardous waste; has the generator met the manifest requirements?				✓

RECORDKEEPING AND REPORTING:

1) Has the generator made a proper hazardous waste determination for all solid wastes generated at the facility? 40 CFR 262.11 (329 IAC 3-7-2) (HWIMS 100)	✓			

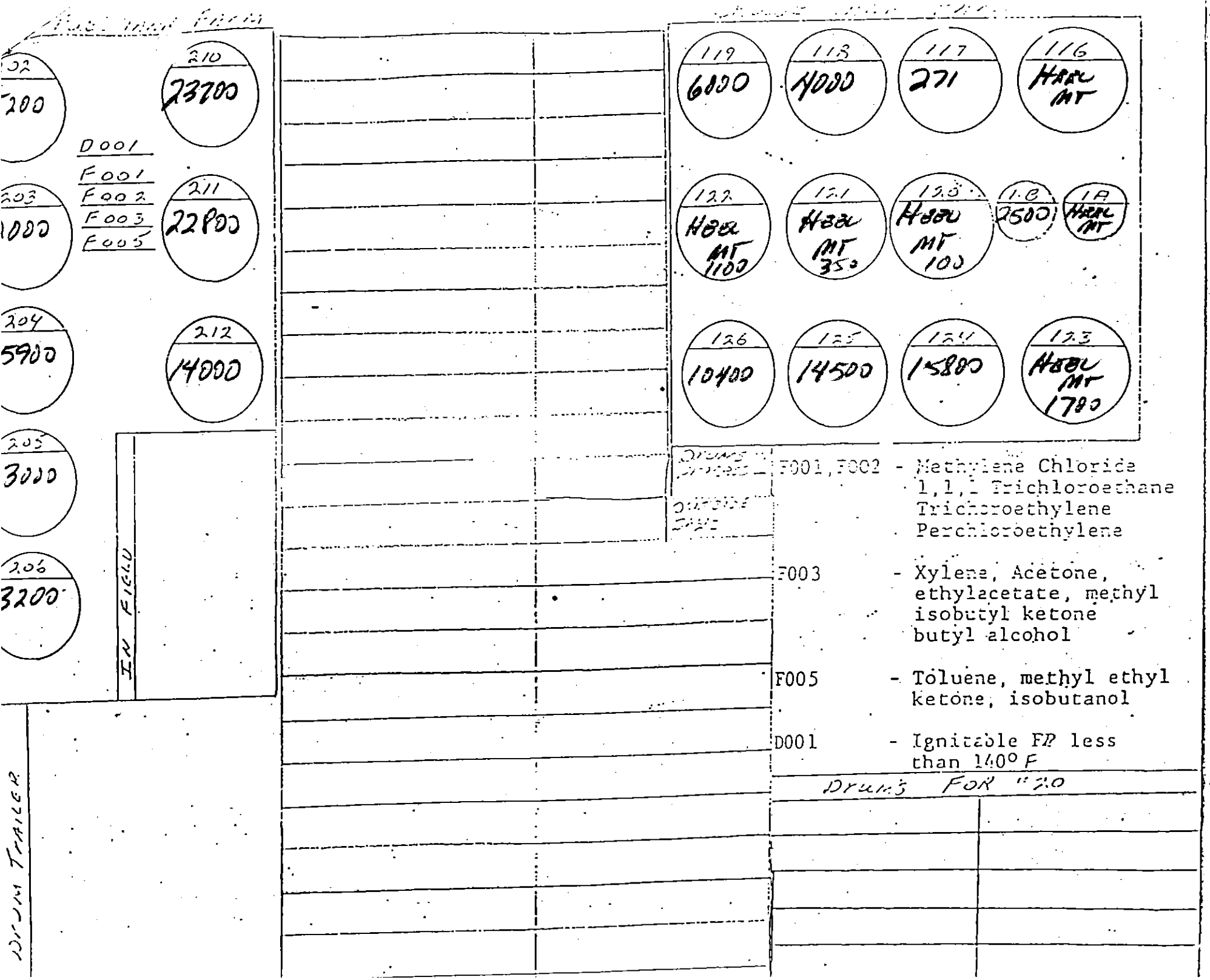
		OK	DF	NI	NA
2)	Has the generator submitted biennial reports and exception reports as required? 329 IAC 3-10-2 and 329 IAC 3-10-3 (HWIMS 180/360)	✓			
3)	Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 40 CFR 262.40 (329 IAC 3-10-1) (HWIMS 180)	✓			

DRAW A SITE MAP; identify site of all hazardous waste activity, i.e. accumulation areas, storage areas, treatment areas, etc.

See Files - Part "B"

Remember to take photos and document as well as possible all violations!!!

5015S
kaw
1/31/89



202
200
203
1000
204
5900
205
3000
206
3200
210
23700
211
22800
212
14000
D001
F001
F002
F003
F005
IN FIELD
DRUM TRAILER
119
6000
118
4000
117
271
116
HEEL MT
122
HEEL MT 1100
121
HEEL MT 350
120
HEEL MT 100
1B
2500
1A
HEEL MT
126
10400
125
14500
124
15800
123
HEEL MT 1700
F001, F002 - Methylene Chloride
1,1,1 Trichloroethane
Trichloroethylene
Perchloroethylene
F003 - Xylene, Acetone, ethylacetate, methyl isobutyl ketone butyl alcohol
F005 - Toluene, methyl ethyl ketone, isobutanol
D001 - Ignitable FP less than 140° F
DRUMS FOR #20

Use and Management of Containers

Location of Unit Location a

(HWIMS 160/410)

	OK	DF	NI	NA
1) Are containers in good condition?	✓			
2) Are containers compatible with waste in them?	✓			
3) Are containers managed to prevent leaks?	✓			
4) Are containers stored closed?	✓			
5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). Ignitable	✓			
6) Are incompatable wastes stored in separate containers? (If not the provisions of 265.17(b) apply)				✓
7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				✓
8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
a. Special handling?	✓			
b. No Smoking signs?	✓			
c. Separation and protection from ignition sources?	✓			
9) Does the container storage area have adequate aisle space (about 2.5 feet)?	✓			
10) Can containers be inspected for leaks or deterioration without moving the containers during the inspection?	✓			

Preparedness and Prevention

11) Security - Do security measures include: (HWIMS 300)				
a. 24- hour surveillance? or				
b. Barrier around facility including controlled entry?	✓			
c. Danger sign(s) at entrance?	✓			
12) Maintenace and Operation of Facility: (HWIMS 140/340, 810 spill)				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?				✓

13) If required, does the facility have the following equipment:
(HWIMS 140/340)

container area

	OK	DF	NI	NA
a. Internal communications or alarm systems?	✓			
b. Telephone or 2-way radios at the scene of operations?	✓			
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic spinklers or water spray equipment available? (Please specify)	✓			

reclaim area

alarm bells

14) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? (HWIMS 140/340) ✓

Testing and Maintenance of Emergency Equipment

(HWIMS 140/340)

	OK	DF	NI	NA
15) a. Has the owner or operator established testing and maintenace procedures for emergency equipment?	✓			
b. Is emergency equipment in operable condition?	✓			
16) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas)	✓			

Annual inspection – By contractors

Hoosier Fire – Pumps by McDaniel

*TSD's Only

check for comments on back!

5017S
kaw
1/13/89

Use and Management of Containers

1) Are containers in good condition? 40 CFR 265.170 (329 IAC 3-23-1)
2) Are containers compatible with waste? 40 CFR 265.172 (329 IAC 3-23-3)
3) Containers managed to prevent leaks? 40 CFR 265.173(b) (329 IAC 3-23-4)
4) Are containers stored closed? 40 CFR 265.173(d) (329 IAC 3-23-4)
5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). 40 CFR 265.176 (329 IAC 3-23-6)
6) Are incompatable wastes stored in separate containers? (If not provisions of 265.17(b) apply) 40 CFR 265.177(a) (329 IAC 3-23-7)
7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? 40 CFR 265.177(c) (329 IAC 3-23-7)
8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?
   a. Special handling?
   b. No Smoking signs?
   c. Separation and protection from ignition sources?
   40 CFR 265.17(a) (329 IAC 3-16-8)
9) Does the container storage area have adequate aisle space (about 2.5 feet)? [329 IAC 3-23-4 (c)]
10) Can containers be inspected for leaks or deterioration without moving the containers [329 IAC 3-23-4 (c)]
11)*Security-Do security measures include:
   a. 24- hour surveillance? or
   b. Barrier around facility including controlled entry?
   c. Danger sign(s) at entrance? 40 CFR 265.14 (329 IAC 3-16-5)
12) Maintenace and Operation of Facility
   a. Is there any evidence of fire, explosion, or release of hazardous waste constituent? 40 CFR 265.31 (329 IAC 3-17-2)
13) If required, does the facility have the following equipment:
   a. Internal communications or alarm systems?
   40 CFR 265.32 (a) & 40 CFR 265.34 (a) (329 IAC 3-17-3 & 5)
   b. Telephone or 2-way radios at the scene of operations?
   40 CFR 265.32 (b) & 40 CFR 265.34 (b) (329 IAC 3-17-3 & 5)
   c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic spinklers or water spray equipment available? 40 CFR 265.32(c)[329 IAC 3-17-3(c)]
14) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)?
   40 CFR 265.34(a)[329 IAC 3-17-5]
15) a. Has the owner or operator established testing and maintenace procedures for emergency equipment?
   40 CFR 265.33 [329 IAC 3-17-4]
   b. Is emergency equipment in operable condition?
   40 CFR 265.33 [329 IAC 3-17-4]
16) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas) 40 CFR 265.35 [329 IAC 3-17-6]

*TSD's Only

Generator Accumulation Appendix
(HWIMS 120)

Location of Unit Injection Storage Tanks
Location "C"

	OK	DF	NI	NA
1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations? 40 CFR 262.30-262.32 (329 IAC 3-9-1 to 3)			✓	
2) Is the container clearly marked with the start of accumulation date? 40 CFR 262.34 (329 IAC 3-9-5)				✓
3) Have more than 90 days elapsed since the date inspected in (a)? 40 CFR 262.34 (329 IAC 3-9-5)				
4) Do wastes remain in accumulation tanks for more than 90 days? 40 CFR 262.34 (329 IAC 3-9-5				
5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"? 40 CFR 262.34 (329 IAC 3-9-5)				

Satellite Accumulation
(HWIMS 120)

	OK	DF	NI	NA
1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents? 40 CFR 262.34 (329 IAC 3-9-5 (c))		✓		
2) Are containers in good condition, compatible with the wastes in them and stored closed? 40 CFR 262.34 (329 IAC 3-23-2 & 3 & 4(a))	✓			

1) (2) containers only one container marked "Hazardous Waste"

Page ____

0022S
kaw
1/13/89

Generator Accumulation Appendix
(HWIMS 120)

Location of Unit Crude Storage, Location "B"

	OK	DF	NI	NA
1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations? 40 CFR 262.30-262.32 (329 IAC 3-9-1 to 3)				✓
2) Is the container clearly marked with the start of accumulation date? 40 CFR 262.34 (329 IAC 3-9-5)				✓
3) Have more than 90 days elapsed since the date inspected in (a)? 40 CFR 262.34 (329 IAC 3-9-5)				
4) Do wastes remain in accumulation tanks for more than 90 days? 40 CFR 262.34 (329 IAC 3-9-5				
5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"? 40 CFR 262.34 (329 IAC 3-9-5)				

Satellite Accumulation
(HWIMS 120)

	OK	DF	NI	NA
1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents? 40 CFR 262.34 (329 IAC 3-9-5 (c))		✓		
2) Are containers in good condition, compatible with the wastes in them and stored closed? 40 CFR 262.34 (329 IAC 3-23-2 & 3 & 4(a))		✓		

1) (2) containers only one container marked "Hazardous Waste"

Page ____

0022S
kaw
1/13/89

ACS

Solids Mixing Area (Former)

WASTE PILES

40 CFR 265, Subpart L

Area not in use

	YES	NO	NI	NA
1) Is wind dispersal of hazardous waste managed? 40 CFR 265.251 (329 IAC 3-26-2)				✓
2) Is the pile protected from precipitation and run-on by some means (such as being under roof)? 40 CFR 265.253(b) (329 IAC 3-26-4-(b)1) (IF NOT then go to number 3)		✓		
3) Are liquids or wastes containing liquids placed in the pile? 40 CFR 265.253(b) (329 IAC 3-26-4-(b)2) (IF SO then go to number 3)				✓

	OK	DF	NI	NA
4) Does the facility maintain a proper run-on control system? 40 CFR 265.253(a)2 (329 IAC 3-26-4(a)2)		✓		
5) Does the facility maintain a proper run-off system? 40 CFR 265.253(a)3 (329 IAC 3-26-4(a)3)		✓		
6) Are run-off and run-on collection and holding facilities managed or emptied expeditiously after storms? 40 CFR 265.253(a)4 (329 IAC 3-26-4(a)4)		✓		
7) If required, are reactive or flammable wastes handled properly? 40 CFR 265.256 & 257 (329 IAC 3-26-5 & 6)				✓

Please describe the location of the pile including data pertinent to regulatory status (ie. inside, outside)

Outside & north west corner of ACS site.

Please describe run-on and run-off control activities.

not provided

	OK	NO	NI	NA
1) Security - Do security measures include: (If applicable)				
See 40 CFR 265.14 (329 IAC 3-16-5) for the following				
a. 24-hour surveillance? or				✓
b. i. Artificial or natural barrier around facility? and	✓			
ii. Controlled entry?	✓			
c. Danger sign(s) at entrance?	✓			

Preparedness and Prevention:

Part 265 Subpart C

	OK	NO	NI	NA
2) Maintenace and Operation of Facility				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 40 CFR 265.31 (329 IAC 3-17-2)				✓
3) If required, does the facility have the following equipment:				
a. Internal communications or alarm systems? 40 CFR 265.32(a) & 40 CFR 265.34(a) (329 IAC 3-17-3 & 5)	✓			
b. Telephone or 2-way radios at the scene of operations? 40 CFR 265.32(b) & 40 CFR 265.34(b) (329 IAC 3-17-3 & 5)	✓			
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic spinklers or water spray equipment available? (Please specify) 40 CFR 265.32(c) (329 IAC 3-17-3(c))	✓			

	OK	DF	NI	NA
4) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? 40 CFR 265.34(a) (329 IAC 3-17-5)				✓
5) Testing and Maintenace of Emergency Equipment:				
a. Has the owner or operator established testing and maintenace procedures for emergency equipment? 40 CFR 265.33 (329 IAC 3-17-4)	✓			
b. Is emergency equipment maintained in operable condition? 40 CFR 265.33 (329 IAC 3-17-4)	✓			
6) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas) 40 CFR 265.35 (329 IAC 3-17-6)	✓			

ACS

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24)

(HWIMS 170/420)

Integrity Assessment Deadlines

Tank System(s)	Deadline
*(1) New installation	At time of
Tank System ID: _____ Date: _____	
_____ _____	
(2) Existing Underground- Cannot Enter (interim status and permitted only)	January 12, 1988 (HSWA)
Tank System ID: _____ Date: _____	
_____ _____	
(3) All remaining Existing Tanks	December 20, 1989
Tank System ID: Injection Storage Tanks (Location "C") Date: Jan. 11, 1988	
_____	

Tank numbers:
202
203
204
205
206
210
211
212

Secondary Containment Deadlines (attached)

Tank System(s)	Deadline
*(1) New	Before putting into use
Tank System ID: _____ Date: _____	
_____ _____	
(2) Existing Underground that cannot be entered (interim status and permitted only)	January 12, 1988 (HSWA)
Tank System ID: _____ Date: _____	
_____ _____	

* New Tank System = operation or installation commenced after July 14, 1986

(3) Existing that S/T Dioxin Waste — June 20, 1990

Tank System ID: _____ Date: _____

(4) Existing-Age Known/ Documentable — June 20, 1990/when tank reaches 15 years old, whichever is later

Tank System ID: _____ Date: _____

(5) Existing-Age Unknown Facility Age greater than 7 years old — June 20, 1990/when facility reaches 15 years old, whichever is later

Tank System ID: _____ Date: _____

(6) Existing-Age Unknown Facililty Age less than 7 years old — June 20, 1996

Tank System ID: _____ Date: _____

Leak Test

All Tank Systems Without Secondary Containment — Leak test annually

State Reg P. 3364 3291AC 3-24-4

Tank System ID: Injection Storage Tanks Date: 12-9-87

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-5)

General Operating Requirements

	YES	NO	NI	NA
1. Are spill prevention controls (e.g. check valves, dry disconnect couplings) in use? 329 IAC 3-24-5(b)1 Quick disconnect at unload area	✓			
How is this checked or inspected 2. Are over fill prevention controls (e.g. level sensing devices, high level alarms) present and operational? 329 IAC 3-24-5(b)2	✓			
3. Is sufficient freeboard maintained in uncovered tanks to prevent overtopping due to wave or wind action or by precipitation? 329 IAC 3-24-5(b)3				✓
4. Has the owner/operator complied with the requirements of 329 IAC 3-24-7 if a leak or spill has occurred in the tank system? (See "leak and spill checklist") 329 IAC 3-24-5(c)				✓

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24-6)

General Inspection Requirements

	YES	NO	NI	NA
1. Does the owner/operator inspect, where present overfill spill control equipment, (e.g. waste-feed cutoff systems, bypass systems, and drainage systems) to ensure that it is in good working order, at least once each operating day? 329 IAC 3-24-6(a)1	✓			
2. Does the owner/operator inspect the above ground portions of the tank system to detect corrosion or release of waste once each operating day? 329 IAC 3-24-6(a)2	✓			
3. Does the owner/operator inspect data gathered from monitoring equipment and leak-detection equipment (e.g. pressure and temperature gauges, monitoring wells) to ensure that tank system is operated according to design once each operating day? 329 IAC 3-24-6(a)3	✓			
4. Does the owner/operator inspect the construction materials and the area immediately surrounding the accessible portion of the tank system including secondary containment structure to detect erosion or signs of releases once each operating day? 329 IAC 3-24-6(a)4				✓
5. Has the owner/operator confirmed, if present, the proper operation of the cathodic protection system within six (6) months of initial installation? 329 IAC 3-24-6(b)1				

Date of installation _____ Date of inspection _____

6. Does the owner/operator inspect the cathodic protector system annually after installation? 329 IAC 3-24-6(b)1				
7. Does the owner/operator inspect all sources of impressed current at least bi-monthly (every other month)? 329 IAC 3-24-6(b)2				

Method used to inspect impressed-current system _____

8. Does the owner/operator document the above-mentioned inspections (#1-7)? 329 IAC 3-24-6(c)				✓

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24-2)

Existing Tank Systems Integrity Assessment

Tank System I.D. Location C

Tank Volume: 202, 204, 205, 206 = 75,000 Tank Type: above
210, 211, 212 = 70,000 above, on, in, below ground
203 = 16,000 usable

	YES	NO	NI	NA
1. Does the tank system have secondary containment? 329 IAC 3-24-4				✓

If yes, see Secondary Containment Checklist, If no, continue below

Date when integrity assessment is required Dec. 29, 1989

Date when secondary containment is required _____

	YES	NO	NI	NA
2. Has the facility been granted a variance (exemption) from secondary containment per 329 IAC 3-24-4(g)		✓		✓
3. Is a written assessment of tank system integrity on file? 329 IAC 3-24-2(a)	✓			
4. If assessment is provided, has it been reviewed and certified by an independent registered, professional engineer? 329 IAC 3-24-2(a)	✓			
5. Does the integrity assessment include the following: 329 IAC 3-24-2(b)				
a. Documented age of the tank system.	✓			
b. Design standards, if available, which the tank and ancillary equipment were constructed.	✓			
c. Hazardous characteristics of the waste that have been or will be handled.	✓			
d. Existing corrosion protection measures.	✓			
e. Results of leak test, internal inspection, or other tank system integrity exams.	✓			

	YES	NO	NI	NA
6. Did the integrity assessment consist of a leak test? 329 IAC 3-24-2(b)5B	✓			

Method of leak testing used All ancillary tested at 80 psi Tanks were filled to a specific volume and then inspected.

-or-

7. Did the integrity assessment consist of a certified internal inspection that addresses cracks, leaks, corrosion and erosion? 329 IAC 3-24-2(b)5B				
8. Has a leak test or internal inspection by an independent, qualified, registered professional engineer that addresses cracks, leaks, corrosion, and erosion been done annually? 329 IAC 3-24-4(i)2				

Non-enterable, Unground tanks

1. Does the assessment consist of a leak test that takes into account the effects of: 329 IAC 3-24-2(b)5A				N/A
a. temperature variations				
b. tank end deflection				
c. vapor pockets				
d. high water table effects				

Method of leak testing used _____

2. Has a leak test been done annually? 329 IAC 3-24(i)1				

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24-3)

New Tank Systems

Tank Volume: _____ Tank Type: _____
above, on, in, below ground

Tank Construction: _____
fiberglass, reinforced plastic, mild steel, etc.

	YES	NO	NI	NA
1. Has the owner/operator obtained a written assessment reviewed and certified by an independent engineer attesting that the system has sufficient structural integrity and is acceptable for S/T of hazardous waste? 329 IAC 3-24-3(a)	___	___	___	___
2. Does the assessment include the following:				
a. Design standards according to which the tank(s) will be constructed 329 IAC 3-24-3(a)1	___	___	___	___
b. Hazardous characteristics of the waste(s) to be handled 329 IAC 3-24-3(a)2	___	___	___	___
c. For tank systems in which the external shell of a metal tank or any component is or will be in contact with the soil or water. Has a corrosion expert conducted a corrosion potential assessment? 329 IAC 3-24-3(a)3A	___	___	___	___
d. Has a corrosion expert determined the type and degree of external corrosion protection that are needed to ensure the integrity of the tank system?. 329 IAC 3-24-3(a)3B	___	___	___	___
e. For tank systems that are affected by vehicular traffic has a determination of design and/or operational measures that will protect the tank system against damage. 329 IAC 3-24-3(a)4	___	___	___	___
f. Design considerations to ensure proper tank foundations, anchoring, and prevention of frost heave. 329 IAC 3-24-3(a)5	___	___	___	___

	YES	NO	NI	NA
3. Has a qualified installation inspector or independent engineer inspected the tank installation prior to covering, enclosing, or placing a new tank system in use? 329 IAC 3-24-3(b)	___	___	___	___
4. Did the inspection check for the presence of the following:				
weld breaks	___	___	___	___
punctures	___	___	___	___
scrapes of protective coatings	___	___	___	___
cracks	___	___	___	___
corrosion	___	___	___	___
other structural damage, or inadequate construction	___	___	___	___
5. Has the tank system been tested for tightness prior to being covered, enclosed, or put in use? 329 IAC 3-24-3(d)	___	___	___	___
6. Has the owner/operator provided and has a corrosion expert supervised the installation of any field fabricated corrosion protection (e.g. cathodic protection)? 329 IAC 3-24-3(f)	___	___	___	___
7. Has the owner/operator obtained and kept on file written statements by those persons requested to certify the design and supervise the installation of the tank system in accordance with 329 IAC 3-24-3(b thru f)? 329 IAC 3-24-3(g)	___	___	___	___
8. Do these written statements include the certification statement as required by 329 IAC 3-34-2(d)?	___	___	___	___

N/A

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-4)

Secondary Containment

Secondary Containment consist of the following:

(circle one) liner, vault, double-walled component, an equivalent device as approved

Type of leak detection equipment employed. _____

_____

	YES	NO	NI	NA
*1. Is the secondary containment system constructed of or lined with materials that are compatible with the waste and have sufficient strength and thickness to prevent failure? 329 IAC 3-24-4(c)1	___	___	X	___
*2. Is the secondary containment system placed on a foundation or base capable of providing support? 329 IAC 3-24-4(c)2	___	___	X	___
3. Is the secondary containment system provided with a leak detection system that will detect the failure of either the primary or secondary containment structure within 24 hours? 329 IAC 3-24-(c)3	___	___	___	___
4. Is the secondary containment system sloped or otherwise designed or operated to drain and remove liquids within 24 hours? 329 IAC 3-24-(c)4	___	___	___	___
*5. Will the secondary containment (liners and vaults) contain 100% of the design capacity of the largest tank in its boundry plus a 25 year - 24 hour rainfall? 329 IAC 3-24-4(e)1A and 2A	___	___	X	___
6. Does any water in secondary containment system appear discolored or otherwise contaminated or is there evidence of waste within the system? 329 IAC 3-24-4(a)1B and 2B	___	___	___	___
7. External Liner Systems				
a. Does the liner cover all the surrounding earth likely to come into contact with wastes, including berms and dikes? 329 IAC 3-24-4(e)1D	___	___	___	___
b. Whether clay, polymeric, or concrete, is the liner free of cracks, gaps, tears, rips, etc.? 329 IAC 3-24-4(e)1C	___	___	___	___

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-4.7)

Response to Leaks and Spills

	YES	NO	NI	NA
1. In the event of a spill or leak did the owner/operator immediately remove the tank system from service and inspect the system for the cause of the release. 329 IAC 3-24-4-7(a)1				✓
2. Was waste removed from leaking tank system and secondary containment within 24 hours of being detected, or at the earliest practicable time? 329 IAC 3-24-7(a)2				
3. Were visible releases to the environment contained and immediately removed? 329 IAC 3-24-7(a)3				
4. In the event of a release, to the environment, did the owner/operator report the incident to the Commissioner within 24 hours? 329 IAC 3-24-7(a)4A				
5. Did the owner/operator submit a written report to the Commissioner within 30 days of a release to the environment with the required information? 329 IAC 3-24-7(a)4C				
6. In the event of a release, has the tank system or secondary containment system been repaired or closed as required? 329 IAC 3-24-7(a)5				
7. Were any extensive repairs to the tank system or secondary containment system certified by an independent, qualified, registered engineer. 329 IAC 3-24-7(a)6				

	YES	NO	NI	NA
8. Vault Systems				
a. Is the vault constructed with chemically resistant water stops at all joints? 329 IAC 3-24-4(e)2C	___	___	___	___
b. Does all concrete, including sumps, have an impermeable coating or lining? 329 IAC 3-24-4(e)2D	___	___	___	___
c. Is there deterioration of protective coatings or liners such as discoloration and film lifting or cracks? 329 IAC 3-24-4(e)2D	___	___	___	___
d. Is the vault provided with a means to protect against the formation of and ignition of vapors within the vault if ignitable or reactive waste is treated or stored? 329 IAC 3-24-4(e)2E	___	___	___	___
9. Double-walled Tanks				
a. If metal, is there appropriate corrosion protection for the inner and outer shell? 329 IAC 3-24-4(e)3B	___	___	___	___
b. Does the double-walled tank have an operational, built-in continuous leak-detection system capable of detecting a release within 24 hours or at the earliest practical time? 329 IAC 3-24-4(e)3C	___	___	___	___
10. Ancillary Equipment Exempt from Secondary Containment				
a. Is all above ground, straight piping that is not covered by secondary containment inspected daily? 329 IAC 3-4(f)1	___	___	___	___
b. Are all welded flanges, welded joints, and welded connections inspected for leaks daily? 329 IAC 3-24-4(f)2	___	___	___	___
c. Are all sealless of magnetic coupling pumps visually inspected for leaks daily? 329 IAC 3-24-4(f)3	___	___	___	___
d. Are all pressurized, above ground piping systems with automatic shutoff devices visually inspected daily? 329 IAC 3-24-4(f)4	___	___	___	___

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-9and 10)

Ignitable or Reactive Waste

	YES	NO	NI	NA
1. Has the waste been treated, mixed or otherwise rendered nonreactive or not ignitable? 329 IAC 3-24-9(a)1				✓
-or-				
2. Is the tank protected from conditions that may cause it to ignite (use of spark proof tools) or protected from contact with materials that may cause it to react? 329 IAC 3-24-9(a)2	✓			
3. Is the required National Fire Protection Association distance between waste tanks (ignitable waste) and public ways and adjoining properties maintained? 329 IAC 3-24-9(b)	✓			
4. Has an appropriate method of tank system decontamination been selected for tanks which previously held incompatable waste? 329 IAC 3-24-10(a and b)				✓

TANK SYSTEMS

Preparedness and Prevention

	YES	NO	NI	NA
1. Security - Do security measures include: (HWIMS 300)				
a. 24-hour surveillance? or				✓
b. Barrier around facility including controlled entry?	✓			
c. Danger sign(s) at entrance?	✓			
2. Maintenance and Operation of Facility (HWIMS 140/340, 810 spill)				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?				✓
3. If required, does the facility have the following equipment? (HWIMS 140/340)				
a. Internal communications or alarm systems?	✓			
b. Telephone or 2-way radios at the scene of operations?	✓			
c. Portable fire extinquishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify.)	✓			
4. Whenever waste is being handled, do all personnel have immediate access to an alarm or communication device (through another employee if always available)? (HWIMS 140/340)	✓			

Testing and Maintenance of Emergency Equipment

(HWIMS 140/340)

5. a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			
b. Is emergency equipment in operable condition?	✓			
6. Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas.)	✓			

5041S
kaw
2/1/89

ACS

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24)

(HWIMS 170/420)

Integrity Assessment Deadlines

Tank System(s)	Deadline
*(1) New installation	At time of
Tank System ID: _____ Date: _____	
_____ _____	
(2) Existing Underground- Cannot Enter (interim status and permitted only)	January 12, 1988 (HSWA)
Tank System ID: _____ Date: _____	
_____ _____	
(3) All remaining Existing Tanks	December 20, 1989
Tank System ID: Crude Storage Location "B" Date: _____	
_____	

Tank numbers:
14
18
16
17
18
19
120
121
122
123
124
125
126

Secondary Containment Deadlines (attached)

Tank System(s)	Deadline
*(1) New	Before putting into use
Tank System ID: _____ Date: _____	
_____ _____	
(2) Existing Underground that cannot be entered (interim status and permitted only)	January 12, 1988 (HSWA)
Tank System ID: _____ Date: _____	
_____ _____	

* New Tank System = operation or installation commenced after July 14, 1986

(3) Existing that S/T Dioxin Waste — June 20, 1990

Tank System ID: _____ Date: _____

_____ _____

(4) Existing-Age Known/ Documentable — June 20, 1990/when tank reaches 15 years old, whichever is later

Tank System ID: _____ Date: _____

_____ _____

(5) Existing-Age Unknown Facility Age greater than 7 years old — June 20, 1990/when facility reaches 15 years old, whichever is later

Tank System ID: _____ Date: _____

_____ _____

(6) Existing-Age Unknown Facililty Age less than 7 years old — June 20, 1996

Tank System ID: _____ Date: _____

_____ _____

Leak Test

All Tank Systems Without Secondary Containment — Leak test annually

Tank System ID: Location B Date: 3/24/88

_____ _____

_____ _____

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-5)

General Operating Requirements

	YES	NO	NI	NA
1. Are spill prevention controls (e.g. check valves, dry disconnect couplings) in use? 329 IAC 3-24-5(b)1	✓			
2. Are over fill prevention controls (e.g. level sensing devices, high level alarms) present and operational? 329 IAC 3-24-5(b)2	✓			
3. Is sufficient freeboard maintained in uncovered tanks to prevent overtopping due to wave or wind action or by precipitation? 329 IAC 3-24-5(b)3				✓
4. Has the owner/operator complied with the requirements of 329 IAC 3-24-7 if a leak or spill has occurred in the tank system? (See "leak and spill checklist") 329 IAC 3-24-5(c)				✓

Tank 203 - must stairs from top

2-55 gal. drums (1) not Marke H.W.
(no start of accumulation)

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24-6)

General Inspection Requirements

	YES	NO	NI	NA
1. Does the owner/operator inspect, where present overfill spill control equipment, (e.g. waste-feed cutoff systems, bypass systems, and drainage systems) to ensure that it is in good working order, at least once each operating day? 329 IAC 3-24-6(a)1	✓			
2. Does the owner/operator inspect the above ground portions of the tank system to detect corrosion or release of waste once each operating day? 329 IAC 3-24-6(a)2	✓			
3. Does the owner/operator inspect data gathered from monitoring equipment and leak-detection equipment (e.g. pressure and temperature gauges, monitoring wells) to ensure that tank system is operated according to design once each operating day? 329 IAC 3-24-6(a)3				✓
4. Does the owner/operator inspect the construction materials and the area immediately surrounding the accessible portion of the tank system including secondary containment structure to detect erosion or signs of releases once each operating day? 329 IAC 3-24-6(a)4				
5. Has the owner/operator confirmed, if present, the proper operation of the cathodic protection system within six (6) months of initial installation? 329 IAC 3-24-6(b)1				

Date of installation _____ Date of inspection _____

6. Does the owner/operator inspect the cathodic protector system annually after installation? 329 IAC 3-24-6(b)1				
7. Does the owner/operator inspect all sources of impressed current at least bi-monthly (every other month)? 329 IAC 3-24-6(b)2				

Method used to inspect impressed-current system _____

8. Does the owner/operator document the above-mentioned inspections (#1-7)? 329 IAC 3-24-6(c)				

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24-2)

Existing Tank Systems Integrity Assessment

Tank System I.D. Location B

Tank Volume: 1A = 2750
1B = 2750
116 = 10,800
117 = 10,800

Tank Type: above
above, on, in, below ground

		YES	NO	NI	NA
118 = 10,800 119 = 10,800 120 = 6,000 121 = 10,500 122 = 10,500 123 = 19,500 124 = 19,500 125 = 19,500	1. Does the tank system have secondary containment? 329 IAC 3-24-4				✓

If yes, see Secondary Containment Checklist, If no, continue below

Date when integrity assessment is required Dec. 29, 1989

Date when secondary containment is required _____

		YES	NO	NI	NA
	2. Has the facility been granted a variance (exemption) from secondary containment per 329 IAC 3-24-4(g)				✓
	3. Is a written assessment of tank system integrity on file? 329 IAC 3-24-2(a)	✓			
	4. If assessment is provided, has it been reviewed and certified by an independent registered, professional engineer? 329 IAC 3-24-2(a)	✓			
	5. Does the integrity assessment include the following: 329 IAC 3-24-2(b)				
	a. Documented age of the tank system.	✓			
	b. Design standards, if available, which the tank and ancillary equipment were constructed.	✓			
	c. Hazardous characteristics of the waste that have been or will be handled.	✓			
	d. Existing corrosion protection measures.	✓			
	e. Results of leak test, internal inspection, or other tank system integrity exams.	✓			

	YES	NO	NI	NA
6. Did the integrity assessment consist of a leak test? 329 IAC 3-24-2(b)5B	✓			

Method of leak testing used all ancillary equipment tested at 80 psi, Tank filled and inspected

-or-

7. Did the integrity assessment consist of a certified internal inspection that addresses cracks, leaks, corrosion and erosion? 329 IAC 3-24-2(b)5B				
8. Has a leak test or internal inspection by an independent, qualified, registered professional engineer that addresses cracks, leaks, corrosion, and erosion been done annually? 329 IAC 3-24-4(i)2				

Non-enterable, Unground tanks

1. Does the assessment consist of a leak test that takes into account the effects of: 329 IAC 3-24-2(b)5A				
a. temperature variations				✓
b. tank end deflection				
c. vapor pockets				
d. high water table effects				

Method of leak testing used _____

2. Has a leak test been done annually? 329 IAC 3-24(i)1				

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24-3)

N/A

New Tank Systems

Tank Volume: _____ Tank Type: _____
above, on, in, below ground

Tank Construction: _____
fiberglass, reinforced plastic, mild steel, etc.

	YES	NO	NI	NA
1. Has the owner/operator obtained a written assessment reviewed and certified by an independent engineer attesting that the system has sufficient structural integrity and is acceptable for S/T of hazardous waste? 329 IAC 3-24-3(a)	___	___	___	___
2. Does the assessment include the following:				
a. Design standards according to which the tank(s) will be constructed 329 IAC 3-24-3(a)1	___	___	___	___
b. Hazardous characteristics of the waste(s) to be handled 329 IAC 3-24-3(a)2	___	___	___	___
c. For tank systems in which the external shell of a metal tank or any component is or will be in contact with the soil or water. Has a corrosion expert conducted a corrosion potential assessment? 329 IAC 3-24-3(a)3A	___	___	___	___
d. Has a corrosion expert determined the type and degree of external corrosion protection that are needed to ensure the integrity of the tank system?. 329 IAC 3-24-3(a)3B	___	___	___	___
e. For tank systems that are affected by vehicular traffic has a determination of design and/or operational measures that will protect the tank system against damage. 329 IAC 3-24-3(a)4	___	___	___	___
f. Design considerations to ensure proper tank foundations, anchoring, and prevention of frost heave. 329 IAC 3-24-3(a)5	___	___	___	___

	YES	NO	NI	NA
3. Has a qualified installation inspector or independent engineer inspected the tank installation prior to covering, enclosing, or placing a new tank system in use? 329 IAC 3-24-3(b)	___	___	___	___
4. Did the inspection check for the presence of the following:				
weld breaks	___	___	___	___
punctures	___	___	___	___
scrapes of protective coatings	___	___	___	___
cracks	___	___	___	___
corrosion	___	___	___	___
other structural damage, or inadequate construction	___	___	___	___
5. Has the tank system been tested for tightness prior to being covered, enclosed, or put in use? 329 IAC 3-24-3(d)	___	___	___	___
6. Has the owner/operator provided and has a corrosion expert supervised the installation of any field fabricated corrosion protection (e.g. cathodic protection)? 329 IAC 3-24-3(f)	___	___	___	___
7. Has the owner/operator obtained and kept on file written statements by those persons requested to certify the design and supervise the installation of the tank system in accordance with 329 IAC 3-24-3(b thru f)? 329 IAC 3-24-3(g)	___	___	___	___
8. Do these written statements include the certification statement as required by 329 IAC 3-34-2(d)?	___	___	___	___

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-4)

N/A

Secondary Containment

Secondary Containment consist of the following:

(circle one) liner, vault, double-walled component, an equivalent device as approved

Type of leak detection equipment employed. _____

_____

	YES	NO	NI	NA
*1. Is the secondary containment system constructed of or lined with materials that are compatible with the waste and have sufficient strength and thickness to prevent failure? 329 IAC 3-24-4(c)1			X	
*2. Is the secondary containment system placed on a foundation or base capable of providing support? 329 IAC 3-24-4(c)2			X	
3. Is the secondary containment system provided with a leak detection system that will detect the failure of either the primary or secondary containment structure within 24 hours? 329 IAC 3-24-(c)3				
4. Is the secondary containment system sloped or otherwise designed or operated to drain and remove liquids within 24 hours? 329 IAC 3-24-(c)4				
*5. Will the secondary containment (liners and vaults) contain 100% of the design capacity of the largest tank in its boundry plus a 25 year - 24 hour rainfall? 329 IAC 3-24-4(e)1A and 2A			X	
6. Does any water in secondary containment system appear discolored or otherwise contaminated or is there evidence of waste within the system? 329 IAC 3-24-4(a)1B and 2B				
7. External Liner Systems				
a. Does the liner cover all the surrounding earth likely to come into contact with wastes, including berms and dikes? 329 IAC 3-24-4(e)1D				
b. Whether clay, polymeric, or concrete, is the liner free of cracks, gaps, tears, rips, etc.? 329 IAC 3-24-4(e)1C				

	YES	NO	NI	NA
8. Vault Systems				
a. Is the vault constructed with chemically resistant water stops at all joints? 329 IAC 3-24-4(e)2C	___	___	___	___
b. Does all concrete, including sumps, have an impermeable coating or lining? 329 IAC 3-24-4(e)2D	___	___	___	___
c. Is there deterioration of protective coatings or liners such as discoloration and film lifting or cracks? 329 IAC 3-24-4(e)2D	___	___	___	___
d. Is the vault provided with a means to protect against the formation of and ignition of vapors within the vault if ignitable or reactive waste is treated or stored? 329 IAC 3-24-4(e)2E	___	___	___	___
9. Double-walled Tanks				
a. If metal, is there appropriate corrosion protection for the inner and outer shell? 329 IAC 3-24-4(e)3B	___	___	___	___
b. Does the double-walled tank have an operational, built-in continuous leak-detection system capable of detecting a release within 24 hours or at the earliest practical time? 329 IAC 3-24-4(e)3C	___	___	___	___
10. Ancillary Equipment Exempt from Secondary Containment				
a. Is all above ground, straight piping that is not covered by secondary containment inspected daily? 329 IAC 3-4(f)1	___	___	___	___
b. Are all welded flanges, welded joints, and welded connections inspected for leaks daily? 329 IAC 3-24-4(f)2	___	___	___	___
c. Are all sealless of magnetic coupling pumps visually inspected for leaks daily? 329 IAC 3-24-4(f)3	___	___	___	___
d. Are all pressurized, above ground piping systems with automatic shutoff devices visually inspected daily? 329 IAC 3-24-4(f)4	___	___	___	___

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-4.7)

Response to Leaks and Spills

		YES	NO	NI	NA
1.	In the event of a spill or leak did the owner/operator immediately remove the tank system from service and inspect the system for the cause of the release. 329 IAC 3-24-4-7(a)1				✓
2.	Was waste removed from leaking tank system and secondary containment within 24 hours of being detected, or at the earliest practicable time? 329 IAC 3-24-7(a)2				
3.	Were visible releases to the environment contained and immediately removed? 329 IAC 3-24-7(a)3				
4.	In the event of a release, to the environment, did the owner/operator report the incident to the Commissioner within 24 hours? 329 IAC 3-24-7(a)4A				
5.	Did the owner/operator submit a written report to the Commissioner within 30 days of a release to the environment with the required information? 329 IAC 3-24-7(a)4C				
6.	In the event of a release, has the tank system or secondary containment system been repaired or closed as required? 329 IAC 3-24-7(a)5				
7.	Were any extensive repairs to the tank system or secondary containment system certified by an independent, qualified, registered engineer. 329 IAC 3-24-7(a)6				

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-9and 10)

Ignitable or Reactive Waste

	YES	NO	NI	NA
1. Has the waste been treated, mixed or otherwise rendered nonreactive or not ignitable? 329 IAC 3-24-9(a)1				✓
-or-				
2. Is the tank protected from conditions that may cause it to ignite (use of spark proof tools) or protected from contact with materials that may cause it to react? 329 IAC 3-24-9(a)2	✓			
3. Is the required National Fire Protection Association distance between waste tanks (ignitable waste) and public ways and adjoining properties maintained? 329 IAC 3-24-9(b)	✓			
4. Has an appropriate method of tank system decontamination been selected for tanks which previously held incompatable waste? 329 IAC 3-24-10(a and b)				✓

TANK SYSTEMS

Preparedness and Prevention

	YES	NO	NI	NA
1. Security - Do security measures include: (HWIMS 300)				
a. 24-hour surveillance? or				✓
b. Barrier around facility including controlled entry?	✓			
c. Danger sign(s) at entrance?	✓			
2. Maintenance and Operation of Facility (HWIMS 140/340, 810 spill)				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?				✓
3. If required, does the facility have the following equipment? (HWIMS 140/340)				
a. Internal communications or alarm systems?	✓			
b. Telephone or 2-way radios at the scene of operations?	✓			
c. Portable fire extinquishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify.)	✓			
4. Whenever waste is being handled, do all personnel have immediate access to an alarm or communication device (through another employee if always available)? (HWIMS 140/340)	✓			

Testing and Maintenance of Emergency Equipment

(HWIMS 140/340)

5. a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			
b. Is emergency equipment in operable condition?	✓			
6. Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas.)	✓			

5041S
kaw
2/1/89

Dates of (Installation) for Tanks

123 – 126 — 1 July 78 (93)

#20 — July 81 (96)

1A – 1B (Purchased 74) — July ~~[illegible]~~ 81 (96)

116 – 119 — Aug 82 (97)

120 – 122 — July ~~[illegible]~~ 81 (96)

#7 — 3/81 (96)

#1, #2, #3 — 1/77 (92)

212 — Aug 81 (96)

1002 — May 86 (01)

210, 211, 203, 204 & 207 — Nov 77 (92)

202, 205 — Nov 77 (92)

(AGE)

Table 1
Listing of Vessels Subject to Assessment

Tank Number	Year Installed *	Capacity (Gal)	Contents *1	Design *2
116	1973	10,800	b	a
117	1973	10,800	b	a
118	1973	10,800	b	a
119	1973	10,800	b	a
120	1981	6,000	b	a
121	1981	10,500	b	a
122	1981	10,500	b	a
123	1968	19,500	b	b
124	1968	19,500	b	b
125	1968	19,500	b	b
126	1968	19,500	b	b
A1	1971	2,750	a	a
B1	1971	2,750	a	a
202	1972	18,000	c	c
203	1969	16,000	c	c
204	1969	17,000	c	c
205	1972	18,000	c	c
206	1971	17,000	c	c
210	1967	23,000	c	c
211	1967	23,000	c	c
212	1981	24,000	c	c

*1) a - Methylene Chloride, 1,1,1• Trichlorethylene Trichloroethylene, Perchloroethylene.
b - Acetone, Methanol, Methyl Ethel Ketone, Isopropyl Alcohol, Toluene, Hexane, Methyl Isobutyl Ketone, Butyl Acetate, Xylene Mineral Spirirts, Butyl Cellosolve, Butanol, Ethyl Acetate.
c - All of the above, Chlorinated not over 20% of the total concentration.

*2) a - Vertical on legs on a concrete slab.
b - Vertical with a flat bottom on a concrete slab.
c - Vertical with a flat bottom on a slag foundation.

* Est. yr. or age

ACS

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24)

Integrity Assessment Deadlines

Tank System(s)	Deadline
(1) New	At time of installation
Tank System ID: _____	Date: _____
(2) Existing Underground-Cannot Enter (interim status and permitted only)	January 12, 1988 (HSWA)
Tank System ID: _____	Date: _____
(3) All remaining Existing Tanks	December 20, 1989
Tank System ID: Tank 1002	Date: March 29, 1988
Year Installed 1977	
age 11 - guess	

Can document when system was put into service

Secondary Containment Deadlines

Tank System(s)	Deadline
(1) New	Before putting into use
Tank System ID: _____	Date: _____
(2) Existing Underground that cannot be entered (interim status and permitted only)	January 12, 1988 (HSWA)
Tank System ID: _____	Date: _____

(3) Existing that S/T Dioxin Waste — June 20, 1990

Tank System ID: _____ Date: _____

_____ _____

(4) Existing-Age Known/ Documentable — June 20, 1990/when tank reaches 15 years old, whichever is later

Tank System ID: _____ Date: _____

_____ _____

(5) Existing-Age Unknown Facility Age greater than 7 years old — June 20, 1990/when facility reaches 15 years old, whichever is later

Tank System ID: _____ Date: _____

_____ _____

(6) Existing-Age Unknown Facililty Age less than 7 years old — June 20, 1996

Tank System ID: _____ Date: _____

_____ _____

Leak Test

All Tank Systems Without Secondary Containment — Leak test annually

Tank System ID: Tank 1002 Date: 3/24/88

_____ _____

_____ _____

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-5)

General Operating Requirements

	YES	NO	NI	NA
1. Are spill prevention controls (e.g. check valves, dry disconnect couplings) in use? tight connection 329 IAC 3-24-5(b)1	✓			
2. Are over fill prevention controls (e.g. level sensing devices, high level alarms) present and operational? 329 IAC 3-24-5(b)2	✓			
3. Is sufficient freeboard maintained in uncovered tanks to prevent overtopping due to wave or wind action or by precipitation? 329 IAC 3-24-5(b)3				✓
4. Has the owner/operator complied with the requirements of 329 IAC 3-24-7 if a leak or spill has occurred in the tank system? (See "leak and spill checklist") 329 IAC 3-24-5(c)				✓

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24-6)

General Inspection Requirements

	YES	NO	NI	NA
1. Does the owner/operator inspect, where present overfill spill control equipment, (e.g. waste-feed cutoff systems, bypass systems, and drainage systems) to ensure that it is in good working order, at least once each operating day? 329 IAC 3-24-6(a)1	✓			
2. Does the owner/operator inspect the above ground portions of the tank system to detect corrosion or release of waste once each operating day? 329 IAC 3-24-6(a)2	✓			
3. Does the owner/operator inspect data gathered from monitoring equipment and leak-detection equipment (e.g. pressure and temperature gauges, monitoring wells) to ensure that tank system is operated according to design once each operating day? 329 IAC 3-24-6(a)3				✓
4. Does the owner/operator inspect the construction materials and the area immediately surrounding the accessible portion of the tank system including secondary containment structure to detect erosion or signs of releases once each operating day? 329 IAC 3-24-6(a)4				✓
5. Has the owner/operator confirmed, if present, the proper operation of the cathodic protection system within six (6) months of initial installation? 329 IAC 3-24-6(b)1				✓

Date of installation _____ Date of inspection _____

6. Does the owner/operator inspect the cathodic protector system annually after installation? 329 IAC 3-24-6(b)1				✓
7. Does the owner/operator inspect all sources of impressed current at least bi-monthly (every other month)? 329 IAC 3-24-6(b)2				✓

Method used to inspect impressed-current system _____

8. Does the owner/operator document the above-mentioned inspections (#1-7)? 329 IAC 3-24-6(c)				✓

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24-2)

Existing Tank Systems Integrity Assessment

Tank System I.D. Tank 1002

Tank Volume: 11,000 Tank Type: above
above, on, in, below ground

	YES	NO	NI	NA
1. Does the tank system have secondary containment? 329 IAC 3-24-4 clay walls with clay cover		✓		

If yes, see Secondary Containment Checklist, If no, continue below

Date when integrity assessment is required Dec. 29, 1989

Date when secondary containment is required ( )

	YES	NO	NI	NA
2. Has the facility been granted a variance (exemption) from secondary containment per 329 IAC 3-24-4(g)		✓		✓
3. Is a written assessment of tank system integrity on file? 329 IAC 3-24-2(a) on site	✓			
4. If assessment is provided, has it been reviewed and certified by an independent registered, professional engineer? 329 IAC 3-24-2(a) John Weaver atec	✓			
5. Does the integrity assessment include the following: 329 IAC 3-24-2(b)				
a. Documented age of the tank system. installation	✓			
b. Design standards, if available, which the tank and ancillary equipment were constructed. API ~~1002~~ 650	✓			
c. Hazardous characteristics of the waste that have been or will be handled.	✓			
d. Existing corrosion protection measures. not specifically addressed	✓			
e. Results of leak test, internal inspection, or other tank system integrity exams.	✓			

Carbon steel Tank

	YES	NO	NI	NA
6. Did the integrity assessment consist of a leak test? 329 IAC 3-24-2(b)5B	✓			

Method of leak testing used all auxiliary - SDPST
Tank filled to a specific volume

-or-

7. Did the integrity assessment consist of a certified internal inspection that addresses cracks, leaks, corrosion and erosion? 329 IAC 3-24-2(b)5B				
8. Has a leak test or internal inspection by an independent, qualified, registered professional engineer that addresses cracks, leaks, corrosion, and erosion been done annually? (definition of annual) 329 IAC 3-24-4(i)2				

Non-enterable, Unground tanks

1. Does the assessment consist of a leak test that takes into account the effects of: 329 IAC 3-24-2(b)5A				
a. temperature variations				✓
b. tank end deflection				↓
c. vapor pockets				↓
d. high water table effects				↓

Method of leak testing used

2. Has a leak test been done annually? 329 IAC 3-24(i)1				

N/A

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24-3)

New Tank Systems

Tank Volume: _____ Tank Type: _____
above, on, in, below ground

Tank Construction: _____
fiberglass, reinforced plastic, mild steel, etc.

	YES	NO	NI	NA
1. Has the owner/operator obtained a written assessment reviewed and certified by an independent engineer attesting that the system has sufficient structural integrity and is acceptable for S/T of hazardous waste? 329 IAC 3-24-3(a)	___	___	___	___
2. Does the assessment include the following:				
a. Design standards according to which the tank(s) will be constructed 329 IAC 3-24-3(a)1	___	___	___	___
b. Hazardous characteristics of the waste(s) to be handled 329 IAC 3-24-3(a)2	___	___	___	___
c. For tank systems in which the external shell of a metal tank or any component is or will be in contact with the soil or water. Has a corrosion expert conducted a corrosion potential assessment? 329 IAC 3-24-3(a)3A	___	___	___	___
d. Has a corrosion expert determined the type and degree of external corrosion protection that are needed to ensure the integrity of the tank system?. 329 IAC 3-24-3(a)3B	___	___	___	___
e. For tank systems that are affected by vehicular traffic has a determination of design and/or operational measures that will protect the tank system against damage. 329 IAC 3-24-3(a)4	___	___	___	___
f. Design considerations to ensure proper tank foundations, anchoring, and prevention of frost heave. 329 IAC 3-24-3(a)5	___	___	___	___

	YES	NO	NI	NA
3. Has a qualified installation inspector or independent engineer inspected the tank installation prior to covering, enclosing, or placing a new tank system in use? 329 IAC 3-24-3(b)	___	___	___	___
4. Did the inspection check for the presence of the following:				
weld breaks	___	___	___	___
punctures	___	___	___	___
scrapes of protective coatings	___	___	___	___
cracks	___	___	___	___
corrosion	___	___	___	___
other structural damage, or inadequate construction	___	___	___	___
5. Has the tank system been tested for tightness prior to being covered, enclosed, or put in use? 329 IAC 3-24-3(d)	___	___	___	___
6. Has the owner/operator provided and has a corrosion expert supervised the installation of any field fabricated corrosion protection (e.g. cathodic protection)? 329 IAC 3-24-3(f)	___	___	___	___
7. Has the owner/operator obtained and kept on file written statements by those persons requested to certify the design and supervise the installation of the tank system in accordance with 329 IAC 3-24-3(b thru f)? 329 IAC 3-24-3(g)	___	___	___	___
8. Do these written statements include the certification statement as required by 329 IAC 3-34-2(d)?	___	___	___	___

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-4)

Secondary Containment

Secondary Containment consist of the following:

(circle one) liner, vault, double-walled component, an equivalent device as approved

Type of leak detection equipment employed. _____

_____

	YES	NO	NI	NA
1. Is the secondary containment system constructed of or lined with materials that are compatible with the waste and have sufficient strength and thickness to prevent failure? 329 IAC 3-24-4(c)1	___	___	___	✓
2. Is the secondary containment system placed on a foundation or base capable of providing support? 329 IAC 3-24-4(c)2	___	___	___	___
3. Is the secondary containment system provided with a leak detection system that will detect the failure of either the primary or secondary containment structure within 24 hours? 329 IAC 3-24-(c)3	___	___	___	___
4. Is the secondary containment system sloped or otherwise designed or operated to drain and remove liquids within 24 hours? 329 IAC 3-24-(c)4	___	___	___	___
5. Will the secondary containment (liners and vaults) contain 100% of the design capacity of the largest tank in its boundry plus a 25 year - 24 hour rainfall? 329 IAC 3-24-4(e)1A and 2A	___	___	___	___
6. Does any water in secondary containment system appear discolored or otherwise contaminated or is there evidence of waste within the system? 329 IAC 3-24-4(a)1B and 2B	___	___	___	___
7. External Liner Systems				
a. Does the liner cover all the surrounding earth likely to come into contact with wastes, including berms and dikes? 329 IAC 3-24-4(e)1D	___	___	___	___
b. Whether clay, polymeric, or concrete, is the liner free of cracks, gaps, tears, rips, etc.? 329 IAC 3-24-4(e)1C	___	___	___	___

	YES	NO	NI	NA
8. Vault Systems				
a. Is the vault constructed with chemically resistant water stops at all joints? 329 IAC 3-24-4(e)2C	___	___	___	___
b. Does all concrete, including sumps, have an impermeable coating or lining? 329 IAC 3-24-4(e)2D	___	___	___	___
c. Is there deterioration of protective coatings or liners such as discoloration and film lifting or cracks? 329 IAC 3-24-4(e)2D	___	___	___	___
d. Is the vault provided with a means to protect against the formation of and ignition of vapors within the vault if ignitable or reactive waste is treated or stored? 329 IAC 3-24-4(e)2E	___	___	___	___
9. Double-walled Tanks				
a. If metal, is there appropriate corrosion protection for the inner and outer shell? 329 IAC 3-24-4(e)3B	___	___	___	___
b. Does the double-walled tank have an operational, built-in continuous leak-detection system capable of detecting a release within 24 hours or at the earliest practical time? 329 IAC 3-24-4(e)3C	___	___	___	___
10. Ancillary Equipment Exempt from Secondary Containment				
a. Is all above ground, straight piping that is not covered by secondary containment inspected daily? 329 IAC 3-4(f)1	___	___	___	___
b. Are all welded flanges, welded joints, and welded connections inspected for leaks daily? 329 IAC 3-24-4(f)2	___	___	___	___
c. Are all sealless of magnetic coupling pumps visually inspected for leaks daily? 329 IAC 3-24-4(f)3	___	___	___	___
d. Are all pressurized, above ground piping systems with automatic shutoff devices visually inspected daily? 329 IAC 3-24-4(f)4	___	___	___	___

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-4.7)

Response to Leaks and Spills

		YES	NO	NI	NA
1.	In the event of a spill or leak did the owner/operator immediately remove the tank system from service and inspect the system for the cause of the release. 329 IAC 3-24-4-7(a)1				✓
2.	Was waste removed from leaking tank system and secondary containment within 24 hours of being detected, or at the earliest practicable time? 329 IAC 3-24-7(a)2				
3.	Were visible releases to the environment contained and immediately removed? 329 IAC 3-24-7(a)3				
4.	In the event of a release, to the environment, did the owner/operator report the incident to the Commissioner within 24 hours? 329 IAC 3-24-7(a)4A				
5.	Did the owner/operator submit a written report to the Commissioner within 30 days of a release to the environment with the required information? 329 IAC 3-24-7(a)4C				
6.	In the event of a release, has the tank system or secondary containment system been repaired or closed as required? 329 IAC 3-24-7(a)5				
7.	Were any extensive repairs to the tank system or secondary containment system certified by an independent, qualified, registered engineer. 329 IAC 3-24-7(a)6				

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-9and 10)

Ignitable or Reactive Waste

	YES	NO	NI	NA
1. Has the waste been treated, mixed or otherwise rendered nonreactive or not ignitable? 329 IAC 3-24-9(a)1				✓
-or- Solvents and hazardous waste derived fuels are handled.				
2. Is the tank protected from conditions that may cause it to ignite (use of spark proof tools) ~~or protected from contact with materials that may cause it to react~~? 329 IAC 3-24-9(a)2	✓			
3. Is the required National Fire Protection Association distance between waste tanks (ignitable waste) and public ways and adjoining properties maintained? 329 IAC 3-24-9(b) app. 200 ft	✓			
4. Has an appropriate method of tank system decontamination been selected for tanks which previously held incompatable waste? 329 IAC 3-24-10(a and b)				✓

1185M
kaw
12/5/88

TANK SYSTEMS

Preparedness and Prevention

	YES	NO	NI	NA
1. Security - Do security measures include:				
a. 24-hour surveillance? or				✓
b. Barrier around facility including controlled entry?	✓			
c. Danger sign(s) at entrance?				
2. Maintenance and Operation of Facility				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?				✓
3. If required, does the facility have the following equipment?				
a. Internal communications or alarm systems?	✓			
b. Telephone or 2-way radios at the scene of operations? Warehouse	✓			
c. Portable fire extinquishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify.)	✓			
4. Whenever waste is being handled, do all personnel have immediate access to an alarm or communication device (through another employee if always available)?	✓			

Testing and Maintenance of Emergency Equipment

5. a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			
b. Is emergency equipment in operable condition?	✓			
6. Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas.)	✓			

1185M
tjd
12/14/88

ACS

Appendix C
Hazardous Waste Burned for Energy Recovery
Section I. is for marketers and Section II. for burners

I. Marketers

	OK	DF	NI	NA
1) Has this facility notified as a Marketer? [266.34(b)] and [320 IAC 4.1-32.5-9(b)]	✓			
2) Is the hazardous waste fuel stored as a hazardous waste ? [266.34(c)] and [320 IAC 4.1-32.5-9(c)]	yes			
3) Is the hazardous waste fuel shipped offsite with a manifest ? [266.34(d) and [320 IAC 4.1-32.5-9(d)]	✓			
4) Has the marketer obtained a one-time certification from the burner or other marketer that;				
a. The burner or marketer has notified of their waste as fuel activities ? [266.34(e)(1)i] and [320 IAC 4.1-32.5-9(e)(1)i]	✓			
b. If the recipent is a burner that the waste will be burned only in approved industrial furnaces or boilers [See 266.31(a)(2)b] ? [266.34(e)(1)ii] and [320 IAC 4.1-32.5-9(e)(1)ii]	✓			
5) Has the marketer provided a one-time certification that he has notified of his waste as fuel activity prior to his first shipment of fuel to that another marketer ? [266.34(e)(2)] and [320 IAC 4.1-32.5-9(e)(2)]	✓			
6) Are all certifications received or sent by the marketer maintained at the site for at least three years ? [266.34(f)] and [320 IAC 4.1-32.5-9(f)]	✓			

Comments:

II. Burners

	OK	DF	NI	NA
1) Has this facility notified as a Burner? [266.35(b)] and [320 IAC 4.1-32.5-10(b)]	yes	—	—	—
2) Is the hazardous waste fuel stored (or accumulated for generators who burn on site) as a hazardous waste ? [266.35(c)1 & 2] and [320 IAC 4.1-32.5-10(c)1 & 2]	yes	—	—	—
3) Has the burner provided the marketer with a certification that he has notified of waste as fuel activites and that he will burn only in approved furnaces or boilers ? [266.35(d)] and [320 IAC 4.1-32.5-10(d)]	yes	—	—	—
4) Are certification forms provided to marketers maintained on file for at least three years ? [266.35(e)] and [320 IAC 4.1-32.5-10(e)]	yes	—	—	—

Comments: ACS burns their own hazardous waste derived fuel in a multi-pass and tube boiler. When in use the boiler uses app. 2,000 gal. per day. ACS representative estimate the use of hazardous waste fuel at one-third of the total fuel consumption.

APPENDIX I
Oversight Inspection Form

Instructions:

The form is divided into two parts. Part 1 is used during the actual inspection to record observations made in the field. Part 2 of the form is used to evaluate the State inspection report relative to field observations. Both parts of the oversight inspection report have to be completed by the EPA oversight inspector. In the remarks column, N/A may be appropriate in some instances.

PART 1

I. Facility Name: American Chemical Service

EPA ID #: IND 016 360265

Facility Activities:
- ___ Small Quantity Generator
- ✓ Generator
- ___ Transporter
- ✓ Treatment/Storage/Disposal Facility

II. Inspection Type:
- ✓ CEI
- ___ O & M
- ___ CME
- ___ Lab Audit
- ___ Records Review
- ___ Compliance Monitoring
- ___ CDI
- ✓ Other (specify) land ban

Items To Be Reviewed:
- ✓ Full Scope
- ___ Limited Scope

Inspection Format:
- ✓ Joint
- ___ Independent

III. EPA Oversight Inspector: Jan Bakk / Rick Herscemann

Organization: U.S. EPA Region V, WMD, REB

Telephone: FTS 886/3789

IV. Inspection Date(s): March 31, 1989

	Yes	No	Remarks
V. Pre-Inspection Review			
1. Did the State inspector arrange the logistics of the inspection by assuring:			
a. facility actively operating?	✓		
b. EPA properly notified?	✓		
2. Did the State transmit requested documents according to the established schedule?	✓		
3. Was the inspector prepared to conduct the inspection? The inspector should have pertinent information (permit application, previous inspection reports, waste types handled) and equipment (safety and sampling)?	✓		
4. Did the inspector present the appropriate identification and advise the owner/operator of the purpose of the inspection and briefly describe the agenda?	✓		
VI. Facility Information (Observations)			
1. Did the inspector demonstrate or obtain knowledge of the facility processes and an understanding of its RCRA history?	✓		
2. Did the inspector conduct a thorough walk-through of the industrial processes and associated hazardous waste generation areas in the facility?	✓		
Were there any areas not inspected? If so, why?		✓	

	Yes	No	Remarks
3. Did the inspector fail to note any violations or improper waste handling activities?		✓	
4. Did the inspector fail to identify any hazardous waste handling areas not pr identified in previous reports or records?		✓	
5. Upon identifying a potential violation, did the inspector initiate case development procedures (i.e., gather detailed evidence to support the findings of violations)?	✓		Drum storage area and solids mixing area had violations
6. Did the inspector check the requirements for preparedness and prevention, including adequate aisle space, emergency equipment availability, and access to communications during hazardous waste handling operations?	✓		
7. If applicable, was sampling performed by State personnel in accordance with standard operating procedures specified by the State and/or EPA?			NA
8. Was proper safety and sampling equipment used to perform the sampling?			NA
9. Was the inspector helpful to the owner/operator by providing explanation of the regulations?	✓		

	Yes	No	Remarks
10. Was the inspector able to answer questions accurately or commit to provide answers at a later date?	✓		
11. If the facility was permitted, did the inspector determine compliance with permit-specific conditions?	✓		
12. Did the inspector perform an exit interview with the owner/operator summarizing the key findings of the inspection?	Unknown		U.S.EPA oversite was only during 3/31/89 9:30 AM - 3:00 PM time period. If exit interview was perform it was not observed by U.S.EPA.

NOTE: The inspector should not make a finding of violation during the inspection, but should only discuss the findings.

VII. Knowledge of the Regulations

	Yes	No	Remarks
1. Was the inspector knowledgeable about hazardous waste regulations applicable to the facility?	✓		
2. Was the inspector aware of recent amendments to the regulations that may affect the conduct of the inspection?	✓		

	Yes	No	Remarks or Not Applicable
VIII. Document Inspection (Review) (Please note if review was performed prior to or during inspection)			
1. Did the inspector thoroughly review the following documents?			
A. For Generators:			
-Inspection records for hazardous waste storage areas	✓		page 8
-Personnel training records	✓		page 9
-Contingency plan	✓		page 10
-Emergency equipment testing and maintenance records	✓		page 7
-Waste analysis records	✓		page 6
-Manifests and exception reports	✓		page 12
-State annual and/or EPA biennial reports	✓		page 4
-Waste minimization plan			
B. In addition, for TSDF's:			
-Part A permit application or final issued permit	✓		preinspection checklist
-Part B application prior to permit issuance			Part B application submitted deficiencies were noted and responses are being reviewed
-Operating record	✓		
-Waste analysis plan	✓		
-Inspection schedule	✓		
-Closure ~~and Post Closure~~ Plan	✓		
-Financial instruments		✓	U.S. EPA is planning to issue a complaint - no liability insurance
-Ground Water Monitoring/Reports			NA
-Other information (treatment plant operations, internal correspondence)	✓		tank systems, HW burner and marketer

PART 2

INSPECTION REPORT REVIEW

	Yes	No	Remarks
I. Review of Inspection Report			
1. Did the inspector submit the completed inspection report within the established SEA or grant deadlines?		✓	Trip report was received by U.S. EPA on 5/22/89 and checklists followed on 6/19/89 for 3/31/89 inspection
2. Did the inspection report contain factual observations rather than opinion?	✓		
Comments:			
3. Was the report accurate and did it sufficiently document all the violations? Were the regulations interpreted correctly?	✓		
4. Did the report contain a discussion of changes that have occurred at the facility since the previous inspection?			no significant changes
If not explain items that should have been included:			
5. Did the inspection report accurately reflect the EPA oversight inspector's observations? If not, explain the differences:	✓		

II. Remarks

1. What is your overall assessment of the inspection and the inspection report?

The inspection was performed in a professional manner and covered a broad range of issues in a short period of time. The report is an accurate reflection of the inspection findings.

2. Describe recommendations that may improve the quality of the State inspection and/or inspection report?

Future inspection reports need to be submitted to U.S. EPA in a shorter time frame.

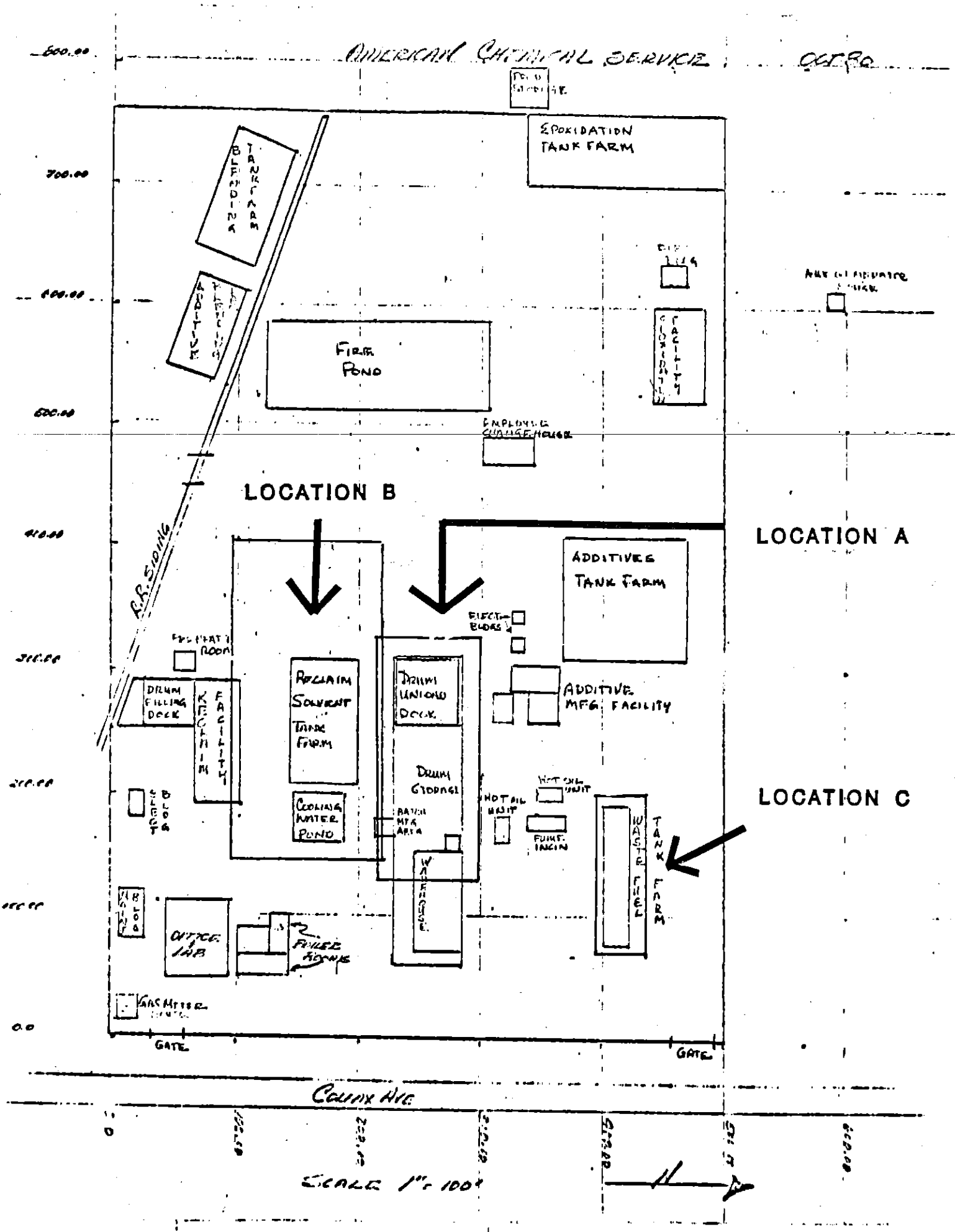
The quality of this report was excellent.

NOTE: Indicate whether the inspector is is need of additional training or is lacking in a particular skill (e.g. hazardous waste sampling) needed for an adequate inspection.

3. Comments on the inspection that could have a bearing on the State inspector evaluation (e.g., facility status under litigation, inadequate time allocated to perform inspection, complex industrial processes and waste handling practices, or numerous regulated units located on site).

ATTACHMENT I

Facility Map



AMERICAN CHEMICAL SERVICE
OCT 80
EPOXIDATION TANK FARM
BLENDING TANK FARM
ADDITIVE BLENDING
FIRE POND
EMPLOYEE CHANGE HOUSE
LOCATION B
LOCATION A
LOCATION C
R.R. SIDING
ADDITIVES TANK FARM
ELECT. BLDGS
DRUM FILLING DOCK
RECLAIM FACILITY
RECLAIM SOLVENT TANK FARM
DRUM UNLOAD DOCK
ADDITIVE MFG. FACILITY
DRUM STORAGE
COOLING WATER POND
BATCH MFG AREA
HOT OIL UNIT
FUME INCIN
WASTE FUEL TANK FARM
WAREHOUSE
OFFICE LAB
FILLER ROOMS
GAS METER
GATE
GATE
COLLAX AVE
SCALE 1" = 100'

ATTACHMENT II

Envirosafe Services of Ohio, Inc.

american Chemical Service, Inc.
P.O. Box 190 • Griffith, Indiana 46319
(219) 924-4370 • Chicago Phone (312) 768-3400

June 24, 1987

Gibraltar Chemical Works
114 East 168th St.
South Holland, IL 60473

Attention: Joan Fencil

Dear Joan,

Federal regulations banning solvent hazardous waste numbers F001, F002, F003, and F005 from landfill disposal went into effect on November 8, 1986.

Our records indicate that you currently ship us D001 waste. If any portion of this is solid, we may have to send it to a secure landfill. This practice has not been banned, and is a legal, less expensive disposal method.

It is important that you do not comingle listed and unlisted waste and that you verify the accuracy of the D001 waste designation shown on your manifest. We ask that you confirm this by signing the certification below and returning it to my attention. We will be unable to receive further shipments until we have your signed certification.

Yours truly,

Walter S. Wagoner, Jr.

I hereby certify that the correct U.S. EPA hazardous waste designation for our waste stream is D001.

Name

Title

RCRA CONFIDENTIAL
BUSINESS INFORMATION
Does Not Contain National
Security Information (E.O. 12065).

TES-IV -M01-0505-03-C-0005

American Chemical Service, Inc.
P.O. Box 190 • Griffith, Indiana 46319
(219) 924-4370 • Chicago Phone (312) 768-3400

June 24, 1987

Eagle Ottawa Leather Co.
200 North Beech Tree St.
Grand Haven, MI 49417

Attention: Charles Velik
Director of Safety and
Environmental Control

Dear Charles,

Federal regulations banning solvent hazardous waste numbers F001, F002, F003, and F005 from landfill disposal went into effect on November 8, 1986.

Our records indicate that you currently ship us D001 waste. If any portion of this is solid, we may have to send it to a secure landfill. This practice has not been banned, and is a legal, less expensive disposal method.

It is important that you do not comingle listed and unlisted waste and that you verify the accuracy of the D001 waste designation shown on your manifest. We ask that you confirm this by signing the certification below and returning it to my attention. We will be unable to receive further shipments until we have your signed certification.

Yours truly,

Walt Wagoner

Walter S. Wagoner, Jr.

I hereby certify that the correct U.S. EPA hazardous waste designation for our waste stream is D001.

Charles Velik
Name

Director of Safety & Environmental Control
Title

RCRA CONFIDENTIAL
BUSINESS INFORMATION
Does Not Contain National
Security Information (E.O. 12065).

TES-IV-M02-0505-03-C-0006

american Chemical Service, Inc.
P.O. Box 190 · Griffith, Indiana 46319
(219) 924-4370 · Chicago Phone (312) 768-3400

July 7, 1987

Envirosafe Services of Ohio, Inc.
876 Otter Creek Road
P.O. Box 7571
Oregon, OH 43616

Dear Mr. Zuccarell,

Enclosed is the additional information requested in your letter of June 17, 1987.

1. Plant description on physical location of D001 waste: Attached is a map of our drum processing and storage area. Note solid D001 drums are stored separately from processing area. All solids shipped to Envirosafe originate from this area.

2. Every incoming drum is checked for solids. Drums containing F001 - F005 solids are not accepted. Attached is a manifest indicating rejected shipments of listed waste. Incoming shipments are isolated in the processing area by customer. When a drum receipt has been approved per Waste Analysis Plan by lab, processing begins. Drum liquids are pumped to appropriate bulk storage tanks. D001 solids are moved to D001 Solids Container Storage Area shown on map.

3. Attached is the ACS Waste Analysis Plan. You will note on Page WP-5 our drum sampling proceedure. Since we do not accept F listed solids, it is not possible to mix D001 solids with listed solids.

4. We have advised customers currently shipping us D001 solids in drums of the Nov. 8 landfill ban of listed wastes. We are requiring them to furnish us with a signed certification before we will accept any further shipments. Attached is a copy of a signed certification.

We trust the information contained in this letter will provide you with the documentation required for our permit revision. If additional information is needed, please contact me immediately.

Yours very truly,

James Tarpo

JT/rl

Enclosures

RCRA CONFIDENTIAL
BUSINESS INFORMATION
Does Not Contain National
Security Information (E.O. 12065).
TES-IV-M01-0505-03-C-0002

ENVIRONMENTAL PROTECTION AGENCY

TECHNICAL ENFORCEMENT SUPPORT AT

HAZARDOUS WASTE SITES

TES IV

CONTRACT NO. 68-01-7351

WORK ASSIGNMENT NO. 505

LAND DISPOSAL RESTRICTION INSPECTION

EPA REGION V

JACOBS ENGINEERING GROUP, INC.

PROJECT NO. 05-B505-00

PREPARED BY:

METCALF & EDDY, INC.

85 W. ALGONQUIN ROAD, SUITE 500

ARLINGTON HEIGHTS, IL 60005

Facility: American Chemical Services
420 South Colfax Avenue
Griffith, IN 46319

EPA Identification Number: IND 016360265

Facility Representative: James Tarpo, President

RCRA CONFIDENTIAL
BUSINESS INFORMATION
Does Not Contain National
Security Information (E.O. 12065).

TES-IV-M01-0505-03-R-0004
Copy 1 of 4

Metcalf & Eddy

85 W. Algonquin Road, Suite 500
Arlington Heights, Illinois 60005-4422
(312) 228-0900

October 22, 1987

J-2993

Ms. Augusta Bloom
U.S. EPA
Waste Management Division
5HE-13
230 S. Dearborn Street
Chicago, Il 60604

RE: TES WA # 505 - Land Disposal Restriction Inspections

Subject: Delivery of Letter Reports and Checklists

Dear Ms. Bloom:

Enclosed, please find two (2) copies of the letter report and checklist for the American Chemical Services facility in Griffith, IN.

Only one copy of this report contains original photographs. This copy should be submitted to the U.S. EPA Primary Contact, Catherine McCord. The other copy should be sent to Mr. Dean Geers of Jacobs Engineering Group, Inc., 222 S. Riverside Plaza, Suite 1870, Chicago, Il, 60606.

Should you have any questions concerning these documents, please feel free to contact me.

Very truly yours,

METCALF & EDDY, INC.

Jack Kratzmeyer

Jack Kratzmeyer
Work Assignment Manager

ENVIROSAFE SERVICES OF OHIO, INC.
876 Otter Creek Road P.O. Box 167571 Oregon, Ohio 43616-7571

Mr. Jim Tarpo
American Chemical Services, Inc.
P. O. Box 190
Griffith, IN 46319

June 17, 1987

Dear Mr. Tarpo:

As a follow-up to our discussion, we should be able to revise your current paint waste stream, with the following information.

1. Submit plant description on physical location of D001 wastes as compared to F001-F005 wastes.
2. Management plan used to separate D001 waste from F001-F005 wastes.
3. Sample plan or waste analysis plan used to assure D001 wastes are not mixed with F001-F005.
4. Policy for informing customers that F001-F005 wastes cannot and are not being mixed with D001 waste; i.e.: letter certifying correct identification of waste.

We at Envirosafe Services Of Ohio, Inc. realize this is an inconvenience, but it is a requirement that must be met if you wish to ship material to our facility. If I can be of further assistance, feel free to contact me.

Sincerely,

Dan Zuccarell

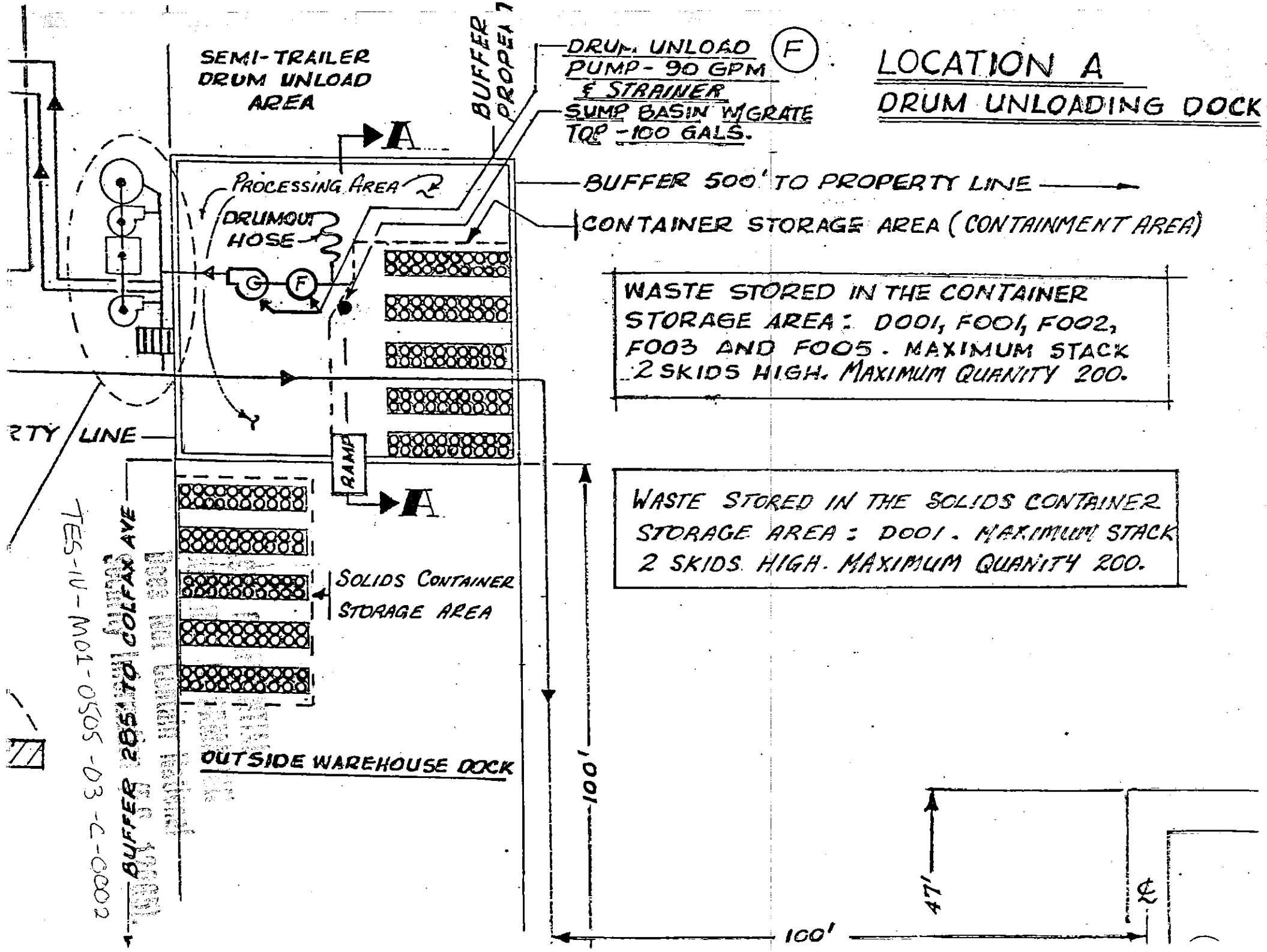
Dan Zuccarell,
Customer Service Representative.

DZ/vm

RCRA CONFIDENTIAL
BUSINESS INFORMATION
Does Not Contain National
Security Information (E.O. 12065).
TES-IU-M01-0505-03-C-0001

(419) 726-1521 - 1-800-472-0414 In Ohio - 1-800-537-0426 Outside Ohio

LOCATION A
DRUM UNLOADING DOCK



TES-IV-M01-0505-03-C-0002

american Chemical Service, Inc.
P.O. Box 190 • Griffith, Indiana 46319
(219) 924-4370 • Chicago Phone (312) 768-3400

June 24, 1987

Service Coatings Corp
15600 Lathrop Avenue
Harvey, IL 60426

Attention: Kathy Mattson
Purchasing Agent

Dear Kathy,

Federal regulations banning solvent hazardous waste numbers F001, F002, F003, and F005 from landfill disposal went into effect on November 8, 1986.

Our records indicate that you currently ship us D001 waste. If any portion of this is solid, we may have to send it to a secure landfill. This practice has not been banned, and is a legal, less expensive disposal method.

It is important that you do not comingle listed and unlisted waste and that you verify the accuracy of the D001 waste designation shown on your manifest. We ask that you confirm this by signing the certification below and returning it to my attention. We will be unable to receive further shipments until we have your signed certification.

Yours truly,

Walt

Walter S. Wagoner, Jr.

I hereby certify that the correct U.S. EPA hazardous waste designation for our waste stream is D001.

Thomas C. Moore
Name

Operations Manager
Title

RCRA CONFIDENTIAL
BUSINESS INFORMATION
Does Not Contain National
Security Information (E.O. 12065).

TES-IV-M01-0505-03-C-0003

American Chemical Service, Inc.
P.O. Box 190 • Griffith, Indiana 46319
(219) 924-4370 • Chicago Phone (312) 768-3400

June 24, 1987

Chicago Tribune Company
435 North Michigan Avenue
Chicago, IL 60611

Attention: Sam Mirza
Purchasing Agent

Dear Sam,

Federal regulations banning solvent hazardous waste numbers F001, F002, F003, and F005 from landfill disposal went into effect on November 8, 1986.

Our records indicate that you currently ship us D001 waste. If any portion of this is solid, we may have to send it to a secure landfill. This practice has not been banned, and is a legal, less expensive disposal method.

It is important that you do not comingle listed and unlisted waste and that you verify the accuracy of the D001 waste designation shown on your manifest. We ask that you confirm this by signing the certification below and returning it to my attention. We will be unable to receive further shipments until we have your signed certification.

Yours truly,

Walt

Walter S. Wagoner, Jr.

I hereby certify that the correct U.S. EPA hazardous waste designation for our waste stream is D001.

Name

Title

RCRA CONFIDENTIAL BUSINESS INFORMATION
Does Not Contain National Security Information (E.O. 12065).

TES-IV-M01-0505-03-C-0004

ATTACHMENT III

Manifest of 80 Drums Land Disposed

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT
P.O. Box 7035
Indianapolis, IN 46207-7035

PLEASE PRINT OR TYPE (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: IND 016 360 265 | Manifest Document No.: 0 0 1 2 | 2. Page 1 of 8 | Information in the shaded areas is not required by Federal law, but items D, F, H and I are required by State law.

3. Generator's Name and Mailing Address
AMERICAN CHEMICAL SERVICE INC
420 S. COLFAX AVE GRIFFITH, INDIANA 46319

4. Generator's Phone (219) 924-4370

A. State Manifest Document Number: INA 0160127
B. State Generator's ID:

5. Transporter 1 Company Name: MR. FRANK INC
6. Use EPA ID Number: ILD 069 506 160
C. State Transporter's ID: 0079
D. Transporter's Phone: 312-596-3377

7. Transporter 2 Company Name:
8. Use EPA ID Number:
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address
ENVIROSAFE SERVICES OF OHIO, INC
876 OTTER CREEK ROAD
OREGON, OHIO 43616
10. Use EPA ID Number: OHD 045 243 706
G. State Facility's ID:
H. Facility's Phone: 419 726 1521

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol.	I. Waste No.
a. WASTE FLAMMABLE SOLID NOS FLAMMABLE SOLID UN 1325	0.8.0	DR	0.0.0.2.0	Y	D001
b.			36160	P	
c.			18.08	T	
d.					

J. Additional Descriptions for Materials Listed Above
PCN 0003B PAINT WASTE/APL #2161

K. Handling Codes for Wastes Listed Above
Y=CUBIC YARDS
D81 SCLF cust

15. Special Handling Instructions and Additional Information
ACCEPTANCE NO. 6730
D.O. NO. 3567

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: JAMES MURPHY | Signature: James Murphy | Date: Month 0.9 Day 1.6 Year 8.7

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: MIGUEL GARCIA | Signature: [signature] | Date: Month 0.9 Day 1.6 Year 8.7

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: | Signature: | Date: Month Day Year

19. Discrepancy Indication Space

RCRA CONFIDENTIAL BUSINESS INFORMATION Does Not Contain National Security Information (E.O. 12-1) TES-IV-M01-0505-03-FW-6002

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted Item 19.
Printed/Typed Name: Dale M Pertner | Signature: Dale M Pertner | Date: Month 0.9 Day 1.6 Year 8.7

GENERATOR / TRANSPORTER / FACILITY

EPA Form 8700-22 (Rev. 9-86)
Previous editions are obsolete.
State Form 11865

SHIPPED
9-16-87
INA-0160127

DRUM	GEN. & MANIFEST	%	GEN. MANIFEST	%
	FORD		EAGLE	
S-1	100607	80	097095	20
S-2		80		20
S-3		80		20
S-4		80		20
S-5		80		20
S-6		80		20
S-7		80		20
S-8		80		20
S-9		80		20
S-10		80		20
S-48R		80		20
S-12		90		10
S-13		90		10
S-14		90		10
S-15		90		10
S-16		90		10
S-17		90		10
S-18		90		10
S-19		90		10
S-20		75		25
S-21		75		25
S-22		80		20
S-23		70		30
S-24		80		20
S-25		80		20
S-26		60		40
S-27		60		40

RCRA CONFIDENTIAL
BUSINESS INFORMATION
Does Not Contain National
Security Information (E.O. 12065).
ES-IU-M01-0505-03-
FW-0004

AMERICAN CHEMICAL SERVICE, INC. IND 016360265

HAZARDOUS WASTE GENERATOR SURVEY

ANALYTICAL DATA SUPPLIED BY GENERATOR

Company Name FORD MOTOR COMPANY - TWIN CITIES ASSEMBLY

Address 966 S. MISSISSIPPI RIVER BLVD ST PAUL, MN

EPA ID # MND 006207773

Waste Description

Chemical Composition - Account for 100% incl. water:

25	CALCIUM CARBONATE %	MAGNESUM SILICATE % 3
25	MINERAL SPIRITS %	%
20	POLY BUTENE %	%
15	TALC %	%
7	ISOPREDE POLYMER %	%
4	TITANIUM DIOXIDE %	%

pH _____ Less than 5

_____ More than 5 - less than 9

_____ More than 9

Flash Point 110 (Pensky-Martens Closed Cup)

Specific Gravity 1.3

Hazardous Waste No. UN 1263

#3

AMERICAN CHEMICAL SERVICE, INC. IND 016360265

HAZARDOUS WASTE GENERATOR SURVEY

GENERATOR AUDIT SHEET

Company Name: FORD MOTOR COMPANY - TWIN CITIES ASSEMBLY PLANT

Address: 966 S. MISSISSIPI RIVER BLVD ST PAUL MN 55116

Telephone: (612) 699-1321 EXT 436

Contact: JOHN KALLANS

EPA ID #: MND 006207773

(A) Characterization of Waste Generating Process

1.) Types and quantities of raw materials used:
CLEANING SOLVENT (NON-HALOGENATED)

2.) Process Information:
DIP CLEANING OF SPRAY GUNS, HOSES ETC

(B) Characterization of Waste

1.) Rate of Production: 750 GALLONS/WEEK

2.) Storage time onsite: 21 Days

3.) Method of waste shipment: X Drums Bulk

4.) Previous history of waste handling:
BULK DISPOSAL AS SECONDARY FUEL

(C) Characterization of other influencing factors at plant.

1.) Other sources of waste which could be mixed:
PAINT SLUDGE REMOVED FROM LINES, GUNS ETC.

2.) Current practices to avoid cross contamination:
LABELING, SEGREGATION IN STORAGE AREA

IND 016360265

AMERICAN CHEMICAL SERVICE, INC.

HAZARDOUS WASTE GENERATOR SURVEY

ANALYTICAL DATA SUPPLIED BY GENERATOR

Company Name: FORD MOTOR COMPANY - TWIN CITIES ASSEMBLY

Address: 966 S. MISSISSIPPI RIVER BLVD ST PAUL, MN 55116

EPA ID #: MND 006207773

Waste Description

Chemical Composition - Account for 100% incl. water:

20%	PAINT SLUDGE %	5%	MISC. %
40%	XYLENE %		%
20%	TOLUENE %		%
5%	VM+P N %		%
5%	BUTYL ACETATE %		%
5%	METHYL AMYL ACETATE %		%

pH _____ Less than 5

_____ More than 5 - less than 9

_____ More than 9

Flash Point _____ (Pensky-Martens Closed Cup)

Specific Gravity _____

Hazardous Waste No. D001 (CONTAINS F003 + F005 SOLVENTS)

Division of Land Pollution Control - Manifest
Indiana State Board of Health
P.O. Box 7035
Indianapolis, IN 46207-7035

DO NOT WRITE IN THIS SPACE

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

Form Approved OMB No. 2000 0404 Expires 7 31 86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. 0 0 6 0 1 3 6 2 6 Manifest Document No. 887011 MIDXXXXXXXXXXXXXXXXXXXX

2. Page 1 of 1

Information in the shaded areas is not required by Federal law

3. Generator's Name
EAGLE OTTAWA LEATHER
200 N. BEECHTREE ST.
GRAND HAVEN, MI 49417

4. Generator's Phone (616) 842-4000

A. State Manifest Document Number IN 097095

B. State Generator's ID 9261395097

5. Transporter 1 Company Name SOUTH CHICAGO

6. US EPA ID Number ILD980682712 8

C. State Transporter's ID 1034

D. Transporter's Phone (312) 978-6382

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
AMERICAN CHEMICAL SERVICE, INC
COLFAX & REDER RDS
GRIFFITH, IND. 46319

10. US EPA ID Number IND016360265

G. State Facility's ID 9180890002

H. Facility's Phone (219) 924-4370

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. WASTE FAMMABLE LIQUID N.O.S. FLAMMABLE LIQUID UN 1993	08	DM	4840	G	D001
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

touluene, mek, mibk, esylene, cyclohexanone, acetone, vinyls, CW-76 (DRUMS)

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name: PONTELLA M. GEORGE SHIPPING CLK | Signature | Month 05 Day 20 Year 87

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Chris Gray | Signature | Month 05 Day 20 Year 87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted Item 19.

Printed/Typed Name: Harold F. Schmidt | Signature | Month 05 Day 20 Year 87

IN 097095

EPA Form 8700-22A (Rev. 11-85) UHWM 2/LP2

T.S.D. DETACH AND RETAIN THIS COPY

MAK 84-204R 5 50 13
4-50 Cubic Yard

FORMULA FOR WASTE UNDERCOATING

#1

AMERICAN CHEMICAL SERVICE, INC. IND 016360265

HAZARDOUS WASTE GENERATOR SURVEY

GENERATOR AUDIT SHEET

Company Name: FORD MOTOR COMPANY - TWIN CITIES ASSEMBLY PLANT

Address: 966 S. MISSISSIPPI RIVER BLVD ST PAUL, MN 55

Telephone: (612) 699-1321 EXT 436

Contact: JOHN KALLAUS

EPA ID #: MND 006207773

(A) Characterization of Waste Generating Process

1.) Types and quantities of raw materials used:
POLYMER BASED SEALERS
50 DRUMS/YEAR

2.) Process Information:
BAD ORDER AND OUTDATED SEALERS

(B) Characterization of Waste

1.) Rate of Production: 1 DRUMS/YEAR

2.) Storage time onsite: 60 Days

3.) Method of waste shipment: X Drums ___ Bulk

4.) Previous history of waste handling:
MATERIAL BLENDED FOR SECOND FUEL

(C) Characterization of other influencing factors at plant.

1.) Other sources of waste which could be mixed:
NON-HAZARDOUS PAINT SLUDGE

2.) Current practices to avoid cross contamination:
LABELING AND SEGERATION IS HAZARDOUS STORAGE AREA

RCRA CONFIDENTIAL BUSINESS INFORMATION Does Not Contain National Security Information (E.O. 12065).

TES-IV-M01-0505-03-FW-0005

Drum	Gen. & Manifest	%	Gen. & Manifest	%
S-55	GIBRALTAR 0132064	50	PRINT FLEX 100730	50
S-56	—	—	"	100
S-57	—	—	"	100
S-58	—	—	"	100
S-59	—	—	"	100
S-60	CHICAGO TRIBUNE 036684	50	"	50
S-61	"	100	—	—
S-62	"	100	—	—
S-63	"	100	—	—
S-64	"	100	—	—
S-65	"	100	—	—
S-66	"	100	—	—
S-67	"	100	—	—
S-68	"	100		—
S-69	"	100		—
S-70	"	30	Service Coating 042254	70
S-71	—	—	"	100
S-72	B-13-PAINT 0130802	20	"	80
S-73	"	100	—	—
S-74	"	100	—	—
S-75	"	100	—	—
S-76	EAGLE 097095	100	—	
S-77	"	100		
S-78	"	100		
S-79	"	100		
S-80	"	100		

RCRA CONFIDENTIAL BUSINESS INFORMATION Does Not Contain National Security Information (E.O. 12065)

TES-IV-M01-0505-03-FW-0004

Division of Land Pollution Control - Manifest
Indiana State Board of Health
P.O. Box 7035
Indianapolis, IN 46207-7035

DO NOT WRITE IN THIS SPACE

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

Form Approved OMB No. 2000 0404 Expires 7.31.86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. / Manifest Document No.: MND006207773 00011

2. Page 1 of 1

Information in the shaded areas is not required by Federal law

3. Generator's Name
Ford Motor Company - Twin Cities Assembly Plant
966 S. Mississippi River Blvd., St. Paul, Mn 55116

4. Generator's Phone (612) 699-1321 ext. 436

A. State Manifest Document Number: IN 100607

B. State Generator's ID

5. Transporter 1 Company Name: Larsen Oil Company, Inc.

6. US EPA ID Number: MND980990667

C. State Transporter's ID

D. Transporter's Phone: 612 825 8130

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
American Chemical Services, Inc.
420 South Colfax Avenue
Griffith, Indiana 46319

10. US EPA ID Number: IND016360265

G. State Facility's ID

H. Facility's Phone

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Waste Paint Related Material Flammable Laiquid, NA 1263	080	DM	04000	G	D001
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above
Contains F003 and F005 listed solvents

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
Return certified copies of the manifest to the attention of "John Kallaus" at the generator's address

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name: John Kallaus | Signature: [signature] | Month Day Year: 04 27 87

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Dale Miller | Signature: [signature] | Month Day Year: 04 27 87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted item 19.

Printed/Typed Name: [illegible] | Signature: [signature] | Month Day Year: 04 27 87

EPA Form 8700-22A (Rev. 11-85) UHWM 2/LP2

T.S.D. DETACH AND RETAIN THIS COPY

BUSINESS CONFIDENTIAL
DOES NOT CONTAIN NATIONAL Security Information (E.O. 12356)
TES-IV-M01-0505-03-FW-0003

IN 100607

MAK 31-7/87 FG3B SUB SOLVS C-4 to 549

Drum	GEN - MANIFEST	%	GEN. MANIFEST	%
S-28	FORD 100607	60	EAGLE 097095	40
S-29		80		20
S-30		75		25
S-31		75		25
S-32		60		40
S-33		80		20
S-35R		75		25
S-35		70		30
S-36		80		20
S-37		70		30
S-38		70		30
S-39		70		30
S-40		60		40
S-41		60		40
S-42		60		40
S-43		60		40
S-44		60		40
S-45		60		40
S-46		60		40
S-47		60		40
S-48		60		40
S-49		60		40
S-99	GIBRALTAR 0132064	100	—	
S-51		100		
S-52		100		
S-53		100		
S-54		100		

AMERICAN CHEMICAL SERVICE, INC. IND 016360265

HAZARDOUS WASTE GENERATOR SURVEY

GENERATOR AUDIT SHEET

SUBMITTED BY: Nick Balodimas (312) 520-0223
MIDWEST ENVIRONMENTAL SERVICES
P.o. Box 1277, Wheeling, Il. 60090

Company Name: EAGLE OTTAWA LEATHER COMPANY

Address: 200 North Beechtree Street

Telephone: Grand Haven, Michigan 49417

Contact: Chuck Velik

EPA ID #: MID006013726

(A) Characterization of Waste Generating Process
1.) Types and quantities of raw materials used:
Paint overspray

2.) Process Information:

(B) Characterization of Waste
1.) Rate of Production: 180 - 270 drums per month

2.) Storage time onsite: seven---- Days

3.) Method of waste shipment: 55 gal. Drums ____ Bulk

4.) Previous history of waste handling:

(C) Characterization of other influencing factors at plant.
1.) Other sources of waste which could be mixed:

2.) Current practices to avoid cross contamination:

BTU VALUE 15,000 - 16,000 BTU/lb.

AMERICAN CHEMICAL SERVICE, INC. IND 016360265

HAZARDOUS WASTE GENERATOR SURVEY

ANALYTICAL DATA SUPPLIED BY GENERATOR

Company Name EAGLE OTTAWA LEATHER COMPANY

Address 200 North Beechtree St., Grand Haven, MI 49417

EPA ID # MID006013726

Waste Description WASTE PAINT & PAINT RELATED MATERIALS

Chemical Composition - Account for 100% incl. water:

Naptha & Water	74 %		%
Inorganic Salts, Pigments	0.6 %		%
Paint Oils & Resins	13.2 %		%
Misc. Solvents	12.2 %		%
	%		%
	%		%

pH

	Less than 5
XXXXX	More than 5 - less than 9
	More than 9

Flash Point 77°F (Pensky-Martens Closed Cup)

Specific Gravity 1

EPA Hazardous Waste No. D001

AMERICAN CHEMICAL SERVICE INC. IND 016360265

HAZARDOUS WASTE GENERATOR SURVEY

JR CERTIFICATION

Generator expressly warrants that the waste is not corrosive, reactive or toxic as defined in 40CFR, 261.22, 261.23 & 261.24. Also, that none of the following are contained in waste shipments:

- Radioactive materials
- PCB
- Insecticides
- Fungicides
- Rodenticides
- Mercaptans
- Organic Cyanides
- Herbicides
- Dioxins

Generator warrants that sample submitted for analysis is representative of waste stream; that generator will notify American Chemical Service, Inc. of any change in processes that will affect waste stream.

EAGLE OTTAWA LEATHER COMPANY
200 North Beechtree St.
Grand Haven, Michigan 49417

Company Name

Chuck Velik

Signature Chuck Velik

Director of Safety

Title Date

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT
P.O. Box 7035
Indianapolis, IN 46207-7035

PLEASE PRINT OR TYPE (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. I L D 0 4 6 5 5 0 1 5 8 | Manifest Document No. 0 0 3 8

2. Page 1 of 1

Information in the shaded areas is not required by Federal law, but items D, F, H and I are required by State law.

3. Generator's Name and Mailing Address
GIBRALTAR CHEMICAL WORKS, INC.
2300 W. 41ST STREET _ CHGO, IL 60609

4. Generator's Phone (312) 523-6622

A. State Manifest Document Number INA 0132064

B. State Generator's ID

5. Transporter 1 Company Name STRAND TRUCKING

6. Use EPA ID Number I L D 0 0 0 0 6 4 8 1 0

C. State Transporter's ID 0024

7. Transporter 2 Company Name

8. Use EPA ID Number

D. Transporter's Phone 385-8440

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
AMERICAN CHEMICAL SERVICE
420 S. COLFAX
GRIFFITH, IND 46319

10. Use EPA ID Number I N D 0 1 6 3 6 1 2 6 5

G. State Facility's ID

H. Facility's Phone 219-924-4370

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol.	Waste No.
a. 55-GALLON DRUMS - WASTE SOLVENTS FLAMMABLE LIQUID - UN #1993	03	DM	0198	1	D001
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above
1 - GALLONS

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name REBECCA MASON | Signature | Date Month 05 Day 86 Year 87

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name HOWARD STRAND | Signature | Date Month 6 Day 1 Year 1

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted Item 19.
Printed/Typed Name MILT PUPA | Signature | Date Month 6 Day 2 Year 89

GENERATOR TRANSPORTER FACILITY

EPA Form 8700-22 (Rev. 9-86)
Previous editions are obsolete.
State Form 11865

DISTRIBUTION:
PAGE 1 (white) TSD MAIL TO GENERATOR
PAGE 2 (goldenrod) GENERATOR MAIL TO GENERATOR STATE
PAGE 3 (light green) TSD MAIL TO TSD STATE
PAGE 4 (light pink) OUT OF STATE GENERATOR/TSD MAIL TO IDEM
PAGE 5 (light blue) TSD COPY
PAGE 6 (canary) GENERATOR COPY
PAGE 7 (white) TRANSPORTER COPY

MAK

INA 0132064

AMERICAN CHEMICAL SERVICE, INC. IND 016360265

HAZARDOUS WASTE GENERATOR SURVEY

GENERATOR AUDIT SHEET

Company Name GIBRALTAR CHEMICAL WORKS

Address 2308 W. 41ST ST. CHICAGO, IL 60609

Telephone 312-523-6622

Contact JOAN FENCIL

EPA ID # ILD046550158

(A) Characterization of Waste Generating Process

1.) Types and quantities of raw materials used:

SOLVENTS-PIGMENTS-ADDITIVES-POLYMERS

2.) Process Information:

BLENDING PROCESS - NO REACTING PROCESSES

(B) Characterization of Waste

1.) Rate of Production: 1 DRUM PER DAY

2.) Storage time onsite: 21-28 Days

3.) Method of waste shipment: XX Drums ____ Bulk

4.) Previous history of waste handling:

NO PREVIOUS HANDLER

(C) Characterization of other influencing factors at plant.

1.) Other sources of waste which could be mixed:

N/A

2.) Current practices to avoid cross contamination:

N/A

AMERICAN CHEMICAL SERVICE, INC. IND 016360265

HAZARDOUS WASTE GENERATOR SURVEY

ANALYTICAL DATA SUPPLIED BY GENERATOR

Company Name GIBRALTAR CHEMICAL WORKS, INC.

Address 2300 W. FORTY FIRST STREET - CHICAGO, ILL. 60609

EPA ID # ILD046550158

Waste Description WASTE SOLVENTS

Chemical Composition - Account for 100% incl. water:

KETONES	50 %		%
AROMATICS	40 %		%
ALCOHOLS	5 %		%
ESTERS	4 %		%
WATER	1 %		%
	%		%

pH _____ Less than 5

XXX More than 5 - less than 9

_____ More than 9

Flash Point 75°F (Pensky-Martens Closed Cup)

Specific Gravity 0.82

AMERICAN CHEMICAL SERVICE, INC. IND016360265

HAZARDOUS WASTE GENERATOR SURVEY

RESHIPMENT SAMPLE ANALYSIS

Company Name GIBRALTAR CHEMICAL WORKS, INC/

Address 2300 W. 41ST STREET-CHICAGO, ILL.

EPA ID # ILD046550158

Waste Description WASTE SOLVENTS

EPA Hazardous Waste No. D001

T-1	BTU/LB	14,106
T-2	% Chloride	NIL
T-3	Sp. Gravity	
T-4	Flash Point	25°F
T-5	Distillation Range	71°-141°C
	% Yield	
T-6	Viscosity	
T-7	Solids	
T-8	pH	
T-9	Select Organics	
T-10	Compatability	
T-11	Acid Solubility	57%

Comments:

AMERICAN CHEMICAL SERVICE INC. IND 016360265

HAZARDOUS WASTE GENERATOR SURVEY

GENERATOR CERTIFICATION

Generator expressly warrants that the waste is not corrosive, reactive or toxic as defined in 40CFR, 261.22, 261.23 & 261.24. Also, that none of the following are contained in waste shipments:

Radioactive materials

PCB

Insecticides

Fungicides

Rodenticides

Mercaptans

Organic Cyanides

Herbicides

Dioxins

Generator warrants that sample submitted for analysis is representative of waste stream; that generator will notify American Chemical Service, Inc. of any change in processes that will affect waste stream.

GIBRALTAR CHEMICAL WORKS, INC.
Company Name

Signature

CORPORATE SECRETARY 9/20/85
Title Date

Division of Land Pollution Control - Manifest
Indiana State Board of Health
P.O. Box 7035
Indianapolis, IN 46207-7035

DO NOT WRITE IN THIS SPACE

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

Form Approved OMB No. 2000 0404 Expires 7 31 86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ILD119664043 87008
Manifest Document No.:

2. Page 1 of

Information in the shaded areas is not required by Federal law

3. Generator's Name
Print Flex, Inc.
1045 Entry Drive
Bensenville, IL. 60106
(312) 595-3610

4. Generator's Phone

A. State Manifest Document Number: IN100730

B. State Generator's ID: 0314145013

5. Transporter 1 Company Name: Strand Truck

6. US EPA ID Number: ILD000646810

C. State Transporter's ID: 0311

D. Transporter's Phone: (312) 385-8400

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
American Chemical
420 S. Colfax
Griffith, IN. 46319

10. US EPA ID Number: IND018360265

G. State Facility's ID: 9180890002

H. Facility's Phone: (312) 768-3400

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Flammable Liquid Waste Solvent UN1993	08	DM	1540	1	D001
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name: Donna Forbes
Signature:
Month Day Year: 6 12 87

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted Item 19.
Printed/Typed Name: Harold F Schmidt
Signature:
Month Day Year: 06 12 87

GENERATOR

TRANSPORTER

FACILITY

IN100730

EPA Form 8700-22A (Rev. 11-85)

UHWM 2/LP2

MRK

T.S.D. DETACH AND RETAIN THIS COPY

28-204R TSD B

AMERICAN CHEMICAL SERVICE, INC. IND 016360265

HAZARDOUS WASTE GENERATOR SURVEY

GENERATOR AUDIT SHEET

Company Name: Print Flex Inc.

Address: 1045 Entry Dr Bensenville IL 6010

Telephone: (301) 595-3610

Contact: Miriam Finkelstein

EPA ID #: ILD 119464043

(A) Characterization of Waste Generating Process

1.) Types and quantities of raw materials used:
INK PIGMENTS + RESINS, SOLVENTS

2.) Process Information:
EQUIPMENT CLEANING

(B) Characterization of Waste

1.) Rate of Production: 1 drum per day

2.) Storage time onsite: 30 Days

3.) Method of waste shipment: X Drums ___ Bulk

4.) Previous history of waste handling:
AMERICAN CHEMICAL

(C) Characterization of other influencing factors at plant.

1.) Other sources of waste which could be mixed:
Normal Propyl Alcohol

2.) Current practices to avoid cross contamination:
NOT APPLICABLE

AMERICAN CHEMICAL SERVICE, INC. IND 016360265

HAZARDOUS WASTE GENERATOR SURVEY

ANALYTICAL DATA SUPPLIED BY GENERATOR

Company Name Print Flex

Address 1045 ENTRY DRIVE Bensenville Il 60106

EPA ID # ILD 119664043

Waste Description

Chemical Composition - Account for 100% incl. water:

_____ %	N.P Acetate 23%
_____ %	Waste Inkresins % 20
_____ %	Ethanol 55 % 3
_____ %	Water 2 %
_____ %	_____ %
_____ %	_____ %

pH X Less than 5

_____ More than 5 - less than 9

_____ More than 9

Flash Point 60°F (Pensky-Martens Closed Cup)

Specific Gravity 0.8

Hazardous Waste No. D001

AMERICAN CHEMICAL SERVICE, INC. IND016360265

HAZARDOUS WASTE GENERATOR SURVEY

PRESHIPMENT SAMPLE ANALYSIS

Company Name PRINTFLEX INC

Address 1045 ENTRY DRIVE, BENSENVILLE, IL 60106

EPA ID # ILD119664043

Waste Description

EPA Hazardous Waste No. D001

T-1	BTU/LB	15,100
T-2	% Chloride	0.2%
T-3	Sp. Gravity	
T-4	Flash Point	
T-5	Distillation Range	
	% Yield	
T-6	Viscosity	
T-7	Solids	
T-8	pH	
T-9	Select Organics	
T-10	Compatability	
T-11	Acid Solubility	

Comments:

AMERICAN CHEMICAL SERVICE INC. IND 016360265

HAZARDOUS WASTE GENERATOR SURVEY

GENERATOR CERTIFICATION

Generator expressly warrants that the waste is not corrosive, reactive or toxic as defined in 40CFR, 261.22, 261.23 & 261.24. Also, that none of the following are contained in waste shipments:

Radioactive materials

PCB

Insecticides

Fungicides

Rodenticides

Mercaptans

Organic Cyanides

Herbicides

Dioxins

Generator warrants that sample submitted for analysis is representative of waste stream; that generator will notify American Chemical Service, Inc. of any change in processes that will affect waste stream.

Print Flex Inc
Company Name

Miriam [illegible]
Signature

Asst Controller 11-15-86
Title Date

Division of Land Pollution Control - Manifest
Indiana State Board of Health
P.O. Box 7035
Indianapolis, IN 46207-7035

DO NOT WRITE IN THIS SPACE

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

Form Approved OMB No. 2000 0404 Expires 7 31 86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ILD045304367
Manifest Document No.: 027
2. Page 1 of: 1
Information in the shaded areas is not required by Federal law

3. Generator's Name
CHICAGO TRIBUNE COMPANY
4. Generator's Phone: 435 North Michigan Avenue Chicago, IL 60611 1-312 222-3204

A. State Manifest Document Number: IN 036684
B. State Generator's ID: 0316320001

5. Transporter 1 Company Name: LANDGREBE MOTOR SERVICE
6. US EPA ID Number: IND009842824
C. State Transporter's ID: 1875
D. Transporter's Phone: 312-842-3121
7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID: 1875
F. Transporter's Phone:

9. Designated Facility Name and Site Address
AMERICAN CHEMICAL SERVICE
Griffith, Indiana
10. US EPA ID Number: IND016360265
G. State Facility's ID:
H. Facility's Phone: (219) 924-4370

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Waste Ink Flammable UN 1210	83	DM	14565	G	D001
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above: 36520 lbs

K. Handling Codes for Wastes Listed Above: Gallons

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name: Sam Mirza | Signature | Month Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials | Date

Printed/Typed Name: Landgrebe Motor Service | Signature | Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials | Date

Printed/Typed Name | Signature | Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted Item 19.

Printed/Typed Name: Harry D. F. Schmidt, American Chemical Service | Signature | Month Day Year

IN 036684

EPA Form 8700-22A (Rev. 11-85) UHWM 2/LP2

EPW

T.S.D. DETACH AND RETAIN THIS COPY 83-204R TSD B

AMERICAN CHEMICAL SERVICE, INC. IND 016360265

HAZARDOUS WASTE GENERATOR SURVEY

GENERATOR AUDIT SHEET

Company Name: CHICAGO TRIBUNE CO.

Address: 435 N. MICHIGAN AVE, CHICAGO, IL 60611

Telephone: 312-222-3204

Contact: SAM MIRZA

EPA ID #: 0316 32 0001 G - ILD045304367

(A) Characterization of Waste Generating Process

1.) Types and quantities of raw materials used:
Black Ink, Solvents

2.) Process Information:
CLEANING PRESSES

(B) Characterization of Waste

1.) Rate of Production: 90-100 DRUMS/MONTH

2.) Storage time onsite: 5 Days

3.) Method of waste shipment: X Drums ___ Bulk

4.) Previous history of waste handling:
Landfill, bulk
Landfill, DRUMS

(C) Characterization of other influencing factors at plant.

1.) Other sources of waste which could be mixed:

2.) Current practices to avoid cross contamination:
Kept segregated in ink room

AMERICAN CHEMICAL SERVICE, INC. IND 016360265

HAZARDOUS WASTE GENERATOR SURVEY

ANALYTICAL DATA SUPPLIED BY GENERATOR

Company Name CHICAGO TRIBUNE

Address 435 N. MICHIGAN CHICAGO, ILL

EPA ID # 0316 320001G · ILD045304367

Waste Description WASTE INK

Chemical Composition - Account for 100% incl. water:

KEROSENE	44.1 %		%
AROMATIC NAPTHA	24.4 %		%
XYLENE	2.4 %		%
INK OILS & RESINS	28.3 %		%
ETHYL BENZENE METHANOL	.5 %		%
INORGANIC SALTS	.3 %		%

pH _____ Less than 5

5.9 More than 5 - less than 9

_____ More than 9

Flash Point 111 (Pensky-Martens Closed Cup)

Specific Gravity _____

Division of Land Pollution Control - Manifest
Indiana State Board of Health
P.O. Box 7035
Indianapolis, IN 46207-7035

DO NOT WRITE IN THIS SPACE

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

Form Approved OMB No. 2000 0404 Expires 7 31 86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ILD005535190
Manifest Document No.:
2. Page 1 of: 1 of 7
Information in the shaded areas is not required by Federal law

3. Generator's Name: Service Coatings, Inc.
15600 Lathrop Ave.
Harvey, IL 60426

4. Generator's Phone (312) 596-8500

A. State Manifest Document Number: IN 042254
B. State Generator's ID: 0311110010
C. State Transporter's ID: 0-3-1-1
D. Transporter's Phone: 312-385-8440
E. State Transporter's ID:
F. Transporter's Phone:
G. State Facility's ID: 9180890002
H. Facility's Phone: 219-924-4370

5. Transporter 1 Company Name: Strand Trucking
6. US EPA ID Number: ILD000646810
7. Transporter 2 Company Name:
8. US EPA ID Number:
9. Designated Facility Name and Site Address: American Chemical
P.O. Box 190
Griffith, IN 46319
10. US EPA ID Number: IND016360265

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Waste Paint Solvent Flammable Liquid - N.O.S. - UN1993	[illegible]	DM	[illegible]	1	D001
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above: 1 = Gallons

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002 (b) of RCRA I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practical and I have selected a method of treatment, storage or disposal currently available to me which minimizes a present and future threat to human health and the environment.

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name: Kathy Mattson
Signature: [signature]
Month Day Year: 06 26 87

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Stan Strand
Signature: [signature]
Date: Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted Item 19.
Printed/Typed Name: [illegible]
Signature: [signature]
Month Day Year

IN 042254

EPA Form 8700-22A (Rev. 11-85)

UHWM 2/LP2

T.S.D. DETACH AND RETAIN THIS COPY 14-123R [illegible]

AMERICAN CHEMICAL SERVICE, INC. IND 016360265

HAZARDOUS WASTE GENERATOR SURVEY

GENERATOR AUDIT SHEET

Company Name: SERVICE COATINGS ~~CORP~~ INC

Address: 15600 LATHROP AVE, HARVEY, IL 60426

Telephone: 312-596-8500

Contact: KATHY MATTSON

EPA ID #: ILD005535190

(A) Characterization of Waste Generating Process

1.) Types and quantities of raw materials used:

PETROCHEMICAL SOLVENTS (AROMATIC, ALIPHATIC, KETONE)
ORGANIC PIGMENT, VINYL AND ACRYLIC RESINS

2.) Process Information:

STANDARD SOLUTION PROCESS

(B) Characterization of Waste

1.) Rate of Production: 20 GAL. DAY

2.) Storage time onsite: 30-45 Days

3.) Method of waste shipment: X Drums ___ Bulk

4.) Previous history of waste handling:

ALL WASTE HAS BEEN HANDLED BY
AMERICAN CHEMICAL SERVICE

(C) Characterization of other influencing factors at plant.

1.) Other sources of waste which could be mixed:

NONE

2.) Current practices to avoid cross contamination:

NONE

AMERICAN CHEMICAL SERVICE, INC. IND 016360265

HAZARDOUS WASTE GENERATOR SURVEY

ANALYTICAL DATA SUPPLIED BY GENERATOR

Company Name Service Coatings, Inc.

Address 15600 Lathrop Ave - Harvey, Il 60426

EPA ID # ILD005535190

Waste Description WASTE SOLVENTS

Chemical Composition - Account for 100% incl. water:

Ketones	25 %		%
Aromatics	25 %		%
Aliphatics	25 %		%
Vinyl Resins	12 %		%
Acrylic Resin	12 %		%
Misc. Additives	1 %		%

pH

	Less than 5
N/A	More than 5 - less than 9
	More than 9

Flash Point < 73°F (Pensky-Martens Closed Cup)

Specific Gravity

AMERICAN CHEMICAL SERVICE, INC. IND016360265

HAZARDOUS WASTE GENERATOR SURVEY

PRESHIPMENT SAMPLE ANALYSIS

Company Name SERVICE COATINGS INC.

Address 15600 LATHROP AVE
HARVEY, IL 60426

EPA ID # ILD005535190

Waste Description WASTE SOLVENTS

EPA Hazardous Waste No. D001

T-1	BTU/LB	15,771
T-2	% Chloride	2.53 %
T-3	Sp. Gravity	
T-4	Flash Point	25° F
T-5	Distillation Range	52° - 131° C
	% Yield	80 %
T-6	Viscosity	
T-7	Solids	
T-8	pH	
T-9	Select Organics	
T-10	Compatability	
T-11	Acid Solubility	45 % - 80 %

Comments:

AMERICAN CHEMICAL SERVICE INC. IND 016360265

HAZARDOUS WASTE GENERATOR SURVEY

GENERATOR CERTIFICATION

Generator expressly warrants that the waste is not corrosive, reactive or toxic as defined in 40CFR, 261.22, 261.23 & 261.24. Also, that none of the following are contained in waste shipments:

Radioactive materials

PCB

Insecticides

Fungicides

Rodenticides

Mercaptans

Organic Cyanides

Herbicides

Dioxins

Generator warrants that sample submitted for analysis is representative of waste stream; that generator will notify American Chemical Service, Inc. of any change in processes that will affect waste stream.

Service Coatings Inc.
Company Name

Thomas C. Moore
Signature

Laboratory Director 9-18-85
Title Date

RCRA CONFIDENTIAL BUSINESS INFORMATION
Does Not Contain National Security Information (E.O. 12065)

TES-IV-M01-0505-03-FW-0005

OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT
P.O. Box 7035
Indianapolis, IN 46207-7035

PLEASE PRINT OR TYPE (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: M-I-D-0-0-5-3-2-0-9-0-4
Manifest Document No.: 687
2. Page 1 of 1
Information in the shaded areas is not required by Federal law, but items D, F, H and I are required by State law.

3. Generator's Name and Mailing Address
B-B Paint Corporation
2201 N. Dort Highway
Flint, MI 48506

4. Generator's Phone (313) 239-8606

A. State Manifest Document Number: INA 0130802
B. State Generator's ID:
C. State Transporter's ID:
D. Transporter's Phone: 317-285-2611
E. State Transporter's ID:
F. Transporter's Phone:
G. State Facility's ID:
H. Facility's Phone:

5. Transporter 1 Company Name: DRURY BROS.
6. Use EPA ID Number: M-I-D-0-5-6-9-8-8-8-9-2
7. Transporter 2 Company Name:
8. Use EPA ID Number:

9. Designated Facility Name and Site Address
AMERICAN CHEMICAL SERVICES.
420 COLFAX AVE
GRIFFITH IN. 46319
10. Use EPA ID Number: IN-D-0-1-6-3-6-0-2-6-5

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol.	I. Waste No.
a. Waste Paint Solvent, Flammable Liquid UN 1263	115	D.M	20825	G	D001
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above
K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
Flammable Liquid

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Bharat S. Rao
Signature: BSRao
Date: Month 07 Day 01 Year 87

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Larry Clay
Signature:
Date: Month 07 Day 01 Year 87

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted Item 19.
Printed/Typed Name: Harold F. Schmidt
Signature:
Date: Month Day Year

RCRA CONFIDENTIAL BUSINESS INFORMATION Does Not Contain National Security Information (E.O. 12065).
IV-M01-0505-03-FW-0003

INA 0130802

EPA Form 8700-22 (Rev. 9-86)
Previous editions are obsolete.
State Form 11865

DISTRIBUTION:
PAGE 1 (white) TSD MAIL TO GENERATOR
PAGE 2 (goldenrod) GENERATOR MAIL TO GENERATOR STATE
PAGE 3 (light green) TSD MAIL TO TSD STATE
PAGE 4 (light pink) OUT OF STATE GENERATOR/TSD MAIL TO IDEM
PAGE 5 (light blue) TSD COPY
PAGE 6 (canary) GENERATOR COPY
PAGE 7 (white) TRANSPORTER 1 COPY
PAGE 8 (white) TRANSPORTER 2 COPY

MRK
14-125K TG2 B - 1 - 204K TSD B

...e of ...ill c...dian ...fice ...vir... ...ntal ...ons ...317/...-51... (day), or 317/633-0144 (night) and the ...ational Response Center at 800/424-8802 or 202/426-2675

SOLVENT WASTE PROFILE

MERLYN INC.
30560 SOUTHFIELD RD.
SOUTHFIELD, MI 48076

2 Ref: PAINT WASTE

MERLYN INC.
30560 SOUTHFIELD RD.
SOUTHFIELD, MI 48076

Please provide all information requested, and return this form to [illegible], Inc., along with a representative sample of the material described. If you need assistance please call or write us.

Company (Generator) B. B. PAINT CORP

EPA Facility Number MID 005322 094

Small Quantity Generator (1,000 kg/mo. or less) ☐ Yes ☒ No

Street Address 220 1 North DORT Hwy

FLINT MICH Zip 48506

Mailing Address: Same Zip

Contact Name: TINO RAO Title Chief Chemist Phone 313-239-8606

Alternate Contact: Title Phone

The waste material will be removed ☑ in drums ☐ in bulk ☐ pumped from drums.

Do you wish the solvent recovered for your reuse? ☐ Yes ☑ No.

If yes, the solvent shall be returned ☐ in drums. ☐ in bulk.

If returned, what is the maximum amount you can accept per shipment _____ gals.

Is your facility permitted to store waste for more than 90 days? ☐ Yes ☑ No

What hours are available for pick up and delivery? 6:30 AM. to 12:30 PM.

How has the waste been disposed of previously? ☐ reclaimed ☑ incinerated ☐ landfilled.

Other _____

If solvent is to be returned please attach specifications.

WASTE DESCRIPTION

EPA Waste Number D001

Common name of waste WASTE PAINT OR OFF SPEC PAINT.

Process generating waste _____

Volume of waste generated per month OCCATIONALLY gallons

Volume on hand presently 300 gallons

Total capacity of storage for waste 300 gallons or drums

PHYSICAL PROPERTIES. Fill in blanks or check appropriate answer.

Physical state at room temperature ☐ Solid ☑ Liquid ☐ Semi-solid

Percent of solid material 25 dissolved; 25 settled.

Flash point 80° °F (closed cup test)

CHEMICAL PROPERTIES. Does this material contain any acidic or basic compounds ☐ yes ☑ no. If yes, please identify and give percentages.

HCL	%	HNO_3	%	NaOH	%
H_2SO_4	%	H_3PO_4	%	NH_4OH	%
	%	CH_3COOH	%	KOH	%
Other:	%		%		%

RCRA CONFIDENTIAL BUSINESS INFORMATION
Does Not Contain National Security Information (E.O. 12065).

TES-IV-M01-0505-03-FW-0006

ATTACHMENT IV

Manifests Of Waste To Be Reclaimed Or Fuel Blended

Division of Land Pollution Control - Manifest
Indiana State Board of Health
P.O. Box 7035
Indianapolis, IN 46207-7035

DO NOT WRITE IN THIS SPACE

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

Form Approved OMB No. 2000 0404 Expires 7 31 86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: IL D 0 0 5 1 9 8 8 6 6 — Manifest Document No.: 0 0 0 1

2. Page 1 of 1

Information in the shaded areas is not required by Federal law

A. State Manifest Document Number: IN 054387

B. State Generator's ID: 0312190002

C. State Transporter's ID: 0311

D. Transporter's Phone: 312 385-8440

E. State Transporter's ID:

F. Transporter's Phone:

G. State Facility's ID: 9180890002

H. Facility's Phone: 312-768-3400

3. Generator's Name: ADHERON COATINGS CORPORATION
16420 South Kilbourn Avenue, Oak Forest, IL 60452

4. Generator's Phone (312) 687-0010

5. Transporter 1 Company Name: STRAND TRUCKING

6. US EPA ID Number: IL D 0 0 0 6 4 6 8 1 0

7. Transporter 2 Company Name:

8. US EPA ID Number:

9. Designated Facility Name and Site Address: AMERICAN CHEMICAL SERVICES INC.
420 S. COLFAX
GRIFFITH IN

10. US EPA ID Number: IN D 0 1 6 3 6 0 2 6 5

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. WASTE FLAMMABLE LIQUID NOS FLAMMABLE LIQUID UN1993	014	DM	07000	P	D001
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above

A. STILL BOTTOM SLUDGE

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name: Donald Nayman — Signature: Donald Nayman — Month Day Year: 06 01 87

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: THOMA STRAND — Signature: Thoma Strand — Month Day Year: 06 01 87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name: Leonard M Strand — Signature: Leonard M Strand — Month Day Year: 06 20 87

19. Discrepancy Indication Space

MATERIAL IN DRUMS DOES NOT MATCH [illegible] SAMPLE
14 DRUMS REJECTED

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted here in.

Printed/Typed Name: MILT POPA — Signature: Milt Popa — Month Day Year: 10 12 87

RCRA CONFIDENTIAL BUSINESS INFORMATION Does Not Contain National Security Information (E.O. 12065).

IN 0 0 4 0 0 1

EPA Form 8700-22A (Rev. 11-85) UDWM 2/LP2

TES-IV-M01-0505-03

RETURNED TO THE GENERATOR BY THE T.S.D. FW-0007

Division of Land Pollution Control - Manifest
Indiana State Board of Health
P.O. Box 7035
Indianapolis, IN 46207-7035

DO NOT WRITE IN THIS SPACE

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

Form Approved OMB No. 2000 0404 Expires 7 31 86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ILD005266069
Manifest Document No.:
2. Page 1 of 1
Information in the shaded areas is not required by Federal law

3. Generator's Name
East Moline Metal Products Co.
1201 7th Street; East Moline, Il. 61244

4. Generator's Phone (309) 752-1301

A. State Manifest Document Number: IN 085976

B. State Generator's ID: 1610255015

5. Transporter 1 Company Name: Watts Trucking Service

6. US EPA ID Number: ILD045376100

C. State Transporter's ID: 0 225

D. Transporter's Phone: 309-788-3421

7. Transporter 2 Company Name:

8. US EPA ID Number:

E. State Transporter's ID:

F. Transporter's Phone:

9. Designated Facility Name and Site Address
American Chemical Services, Inc.
720 Colfax Ave. So.
Griffith, IN. 46319

10. US EPA ID Number: IND016360265

G. State Facility's ID:

H. Facility's Phone: 219-924-4370

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Waste Flammable Liquid, N.O.S. UN1993 (D001)	017	DM	[illegible]	GAL.	D001
b.					
c. Accepted 11 Drums					
d.					

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name: [illegible]
Signature: [illegible]
Month Day Year: 04 [illegible] 87

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: William L. Atkins
Signature: William L. Atkins
Date: Month Day Year: 04 [illegible] 87

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year:

19. Discrepancy Indication Space
Rejected 6 Dr. Not Pumpable
Accepted 11 Drums 2H

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted Item 19.
Printed/Typed Name: [illegible]
Signature: [illegible]
Month Day Year: 04 27 87

GENERATOR

TRANSPORTER

FACILITY

IN 085976

EPA Form 8700-22A (Rev. 11-85)

GENERATOR DETACH AND RETAIN THIS COPY

UHWM 2/LP2

MAK Rejected 6 Dr.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT
P.O. Box 7035
Indianapolis, IN 46207-7035

PLEASE PRINT OR TYPE (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: IND.0.00.8.0685.1
Manifest Document No.: 53.6.2.2
2. Page 1 of 2
Information in the shaded areas is not required by Federal law, but items D, F, H and I are required by State law.

A. State Manifest Document Number: INA 0153622

3. Generator's Name and Mailing Address: Delco Electronics Corp. - BYPASS Plant, 700 E. Firmin St., M.S. 9152, Kokomo IN 46902

B. State Generator's ID:

4. Generator's Phone (317) 451-1406

5. Transporter 1 Company Name: STRAND Trucking INC
6. Use EPA ID Number: IL0.0006.7.6.8.1.0

C. State Transporter's ID: 0311
D. Transporter's Phone: (312) 385-8440

7. Transporter 2 Company Name:
8. Use EPA ID Number:

E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address: AMERICAN Chemical Service, INC. 420 S. Colfax Ave. Griffith, IN 46319
10. Use EPA ID Number: IND.0.1.6.3.6.0.2.6.5

G. State Facility's ID:
H. Facility's Phone: (219) 924-4370

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol.	I. Waste No.
a. RQ WASTE Trichloroethylene, ORM-A UN 1710 (RQ-F001)	0.05	DM	275	G	F001
b. RQ WASTE Flammable Liquid, N.O.S. UN 1993 (RQ F001, F003, F005)	0.47	DM	2585	G	F001 F003 F005
c. RQ HAZARDOUS WASTE, Liquid, N.O.S. UN 9189 (RQ-F002) ORM-E	0.17	DM	935	G	F002
d. RQ WASTE 1,1,1 Trichloroethane, ORM-A UN 2831 (RQ-F001)	0.07	DM	385	G	F001

J. Additional Descriptions for Materials Listed Above:
K. Handling Codes for Wastes Listed Above:

15. Special Handling Instructions and Additional Information:
IN CASE of Spill Contact Norman J. GRAY at (317) 451-1406

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Garnett Carter
Signature: Garnett Carter
Date: Month 09 Day 25 Year 87

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: THOMAS STRAND
Signature: Thomas Strand
Date: Month 09 Day 25 Year 87

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year

19. Discrepancy Indication Space:

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted Item 19
Printed/Typed Name: HARROLD F. Schmidt
Signature: Harrold F. Schmidt
Date: Month 09 Day 25 Year 87

GENERATOR
TRANSPORTER
FACILITY

INA 0153622

EPA Form 8700-22 (Rev. 9-86)
Previous editions are obsolete.
State Form 11865

DISTRIBUTION:
PAGE 1 (white) TSD MAIL TO GENERATOR
PAGE 2 (goldenrod) GENERATOR MAIL TO GENERATOR STATE
PAGE 3 (light green) TSD MAIL TO TSD STATE
PAGE 4 (light pink) OUT OF STATE GENERATOR/TSD MAIL TO IDEM
PAGE 5 (light blue) TSD COPY
PAGE 6 (canary) GENERATOR COPY
PAGE 7 (white) TRANSPORTER 1 COPY
PAGE 8 (white) TRANSPORTER 2 COPY

Delco Electronics

Subsidiary of GM Hughes Electronics

LAND DISPOSAL RESTRICTION NOTIFICATION

Generator Name: Delco Electronics Corp. - BYPASS
EPA ID Number: IND 006806351
Facility Mailing Address: 700 E. Firmin St., M.S. 5152
Kokomo, IN 46902

We are shipping to you under manifest number IND 0153622 a waste stream defined and classified by the EPA Hazardous Waste Number(s) F001, F002, F003, F005. This stream contains constituents listed in the F001-F005 spent solvent listings and therefore are subject to the November 1986 land disposal ban. Below specific constituents are listed along with their respective treatment standard.

CONSTITUENT	TREATMENT STANDARD
Trichloroethylene	0.091
1,1,1 Trichloroethane	0.41
Toluene	0.33
1,2,2 Trichloro - 1,2,2 trifluoroethane	0.96
Methylene Chloride	0.96

This composition is based on my knowledge of the waste or an analysis which will be attached.

All values reported in Mg/L (ppm)	Wastewaters Containing Spent Solvent	All other Spent Solvent Wastes
Acetone	0.05	0.59
n-Butyl alcohol	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	0.05	0.96
Chlorobenzene	0.15	0.05
Cresols (and cresylic acid)	2.82	0.75
Cyclohexanone	0.125	0.75
1,2 - dichlorobenzene	0.68	0.125
Ethyl acetate	0.05	0.75
Ethyl benzene	0.05	0.053
Ethyl ether	0.05	0.75
Isobutanol	5.0	5.0
Methanol	0.25	0.75
Methylene chloride	0.20	0.96
Methylene chloride (pharmaceutical industry)	12.7	0.96
Methyl ethyl ketone	0.05	0.75
Methylisobutylketone	0.05	0.33
Nitrobenzene	0.65	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1 trichloroethane	1.05	0.41
1,2,2 trichloro - 1,2,2 trifluroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

Delco Electronics Corporation, Plant BYPASS hereby notifies American Chemical Services, Inc. that the above referenced solvents are subject to the land disposal prohibition. The waste and its treatment residues must be handled accordingly.

Authorized representative signature: Norman J. Gray

Print or type name: NORMAN J. GRAY

Title or relationship to the generator: Employee Environmental Engineer

Date: 9/25/87

TES-IW-M01-0505-03-FW-0007

National Information Center for Hazardous Waste Information (N.C. 12065) Security Information

ATTACHMENT V

Manifest Of Hazardous Waste
Derived Fuel

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT
P.O. Box 7035
Indianapolis, IN 46207-7035

PLEASE PRINT OR TYPE (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: I N D 0 1 6 3 6 0 2 6 5
Manifest Document No.: 0 0 4 4
2. Page 1 of 8
Information in the shaded areas is not required by Federal law, but items D, F, H and I are required by State law.

3. Generator's Name and Mailing Address
AMERICAN CHEMICAL SERVICE
420 S. Colfax Avenue
Griffith, Indiana 46319
4. Generator's Phone ( ) 219/924-4370

A. State Manifest Document Number: INA 0117761
B. State Generator's ID:

5. Transporter 1 Company Name: EJE Railroad
6. Use EPA ID Number: I+N D 0 0 0 7 8 0 2 6 2
C. State Transporter's ID:
D. Transporter's Phone: 815-760-6475

7. Transporter 2 Company Name: Burlington Northern
8. Use EPA ID Number: M N D 0 4 8 3 4 1 7 8 8
E. State Transporter's ID:
F. Transporter's Phone: 800-342-5123

9. Designated Facility Name and Site Address
Ash Grove Cement
Highway 50 & 66
Louisville, NB
10. Use EPA ID Number: N E D 0 0 7 2 6 0 6 7 2
G. State Facility's ID:
H. Facility's Phone: 1-402-234-2415

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol.	I. Waste No.
a. WASTE FLAMMABLE LIQUID NOS UN 1993 FLAMMABLE LIQUID D001-RQ	1	T/C	[illegible]	G	F001 F002 F003 F005 D001
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above
Chem Fuel Blend
Sample# [illegible] Lab Report# [illegible]

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
Rail Car# [illegible]
Rail Car must be weighed
T/C To be returned via reverse routing to original shipper

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: [illegible] Signature: [illegible] Date: Month / Day / Year

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: [illegible] Signature: Date: Month / Day / Year

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: Signature: Date: Month / Day / Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted Item 19.
Printed/Typed Name: Signature: Date: Month / Day / Year

GENERATOR / TRANSPORTER / FACILITY

NCRA CONFIDENTIAL BUSINESS INFORMATION Does Not Contain National Security Information (E.O. 12065)

TES-IV-M01-0505-03-FW-0008

0117761

Na[illegible]al Response Center at 800/424-8802 or 202/426-2675.

EPA Form 8700-22 (Rev. 9-86)
Previous editions are obsolete.
State Form 11865

DISTRIBUTION: [illegible]

MEMORANDUM is an acknowledgment that a bill of lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record. subject to the classifications and lawfully filed tariffs in effect on the date of the receipt by the carrier of the property described in the Original Bill of Lading

LOAD RECORD NO. 31852

RAIL CAR/TRUCK NO.	UTLX 46790
SHIPPING DATE	9 / 29 / 87
DELIVERY DATE	/ /

MAIL ALL FREIGHT INVOICES TO:

cadence chemical resources, inc.

P.O. Box 770 • Michigan City, IN 46360-0770 • 219/879-0371

EPA ID # INT 190010686

CHEMICAL EMERGENCY - SPILL, LEAK, FIRE, EXPOSURE, OR CCIDENT - CALL CHEMTREC (800) 424-9300 DAY OR NIGHT

y described below, in apparent good order, except as noted (contents and conditions of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as ny person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier y of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic ll of Lading set forth (1) in Uniform Freight Classification in effect on the date hereof, if this is a rail or a rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. er hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are eed to by the shipper and accepted for himself and his assigns.

(ORIGINATING PROCESSOR)	CONSIGNED TO (CUSTOMER & DESTINATION)
American Chemical Services 420 South Colfax Griffith, IN 46319	Ash Grove Cement Highway 60 & 66 Louisville, NE 68037
D # IND 016340245	EPA ID # NED 007360672

Load Originating as single rail/truck load:

Manifest State INDIANA Manifest No. IWA 0117761

Load Originating as multiple truck load into single rail car ▸

TRUCK/TRAILER NO.	MANIFEST NO.

bject to Section 7 of Conditions of applicable lading, if this shipment is to be delivered to onsignee without recourse on the consignor, onsignor shall sign the following statement: e carrier shall not make delivery of this ship- ithout payment of freight and all other arges. ENCE CHEMICAL RESOURCES, INC. (Signature of Consignor)

If charges are to be prepaid, write or stamp here, "To Be Prepaid."

TO BE PREPAID

† Shipper's Imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

WAYBILL NO.

CARRIER 1: EJ&E

CARRIER 2: BN

CARRIER 3

VERIFICATION	SEAL NUMBER(S)
ORIGIN AC	4159
	4160
DESTINATION AG	4161

PRODUCTION LOT # B-3803 / TEI # 7298

BTU/lb 12,340

% Cl 2.29

lb/gal 7.98

Lab Tech GPM

CIAL INSTRUCTIONS:

RETURN EMPTY VIA REVERSE ROUTE TO ORIGINAL SHIPPER

TTACH WEIGHT/SCALE TICKETS FOR TRUCK SHIPMENT AIL CAR **MUST** BE WEIGHED AND WEIGHT REPORTED TO CADENCE

RAIL CAR REROUTING OF EMPTY CAR

This shipment contains ketones, aromatics, acetates, aliphatics, resins, and pigments.

NO. OF UNITS CONTAINER TYPE	HM	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name and Class per 49 CFR 172,101)	GALLONS	WEIGHT (Sub. to Corr.)
1 T/T		Waste Flammable Liquid NOS UN 1993 RQ CHEM-FUEL® K BLEND ☐ Rec'd - Flammable Placards Furnished Driver		
1 T/C		Waste Flammable Liquid NOS UN 1993 RQ CHEM-FUEL® K BLEND Placarded Flammable	19,960	159281
		9170 40 281 90		

ACTUAL SCALE WEIGHT

GROSS

TARE

NET

GALLONS

3 Analysis for this shipment - UNDETETED (in accordance with 40 CFR 761.20 (C) (4)).

PER: This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for sportation according to the applicable regulations of the Department Of Transportation & EPA. (Signature)

ATING TRANSPORTER: I hereby certify that the above described materials are accepted for transportation and delivery, and the equipment is properly ured for the classification. (Signature)

EIVED BY: (Signature) UNLOAD DATE

tomer) (Date)

inating Transporter Shipper, Per Agent, Per

nanent Post office address: Cadence Chemical Resources, Inc., P.O. Box 770, Michigan City, IN 46360-0770

PROCESSOR COPY TES-IU-M01-0505-03-FW-0008

DOD Unclassified
Does Not Contain Classified Information (E.O. 12065).
Security Information

ATTACHMENT VI

Shipment of Reclaimed
Solvents

IIS MEMORANDUM is an acknowledgment that a Bill of Lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

Shipper's No.

ie of
ier

Date: 8/21/87

Carrier's No.

D. subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described below in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below which said carrier (the ier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed h carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading Uniform Freight Classifications in effect on the date hereof, if this is a rail or a rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.
ipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed per and accepted for himself and his assigns.

FROM:

ısigned	Adheron Ctgs	Shipper	American Chemical Service
ıet	16420 S. Kilbourn	Street	420 S. Colfax Avenue P.O. Box 180
ıtination	Oak Forest, IL 60452	Origin	Griffith, Indiana 46319

(Mail or street address of consignee-for purposes of notification only)

NO.	ROUTE	VEHICLE NUMBER
VBL Debbie	Strand	

Kind of Package, Description of Articles, Special Marks and Exceptions	*Weight	Class or Rate	Check (✓)
PAINT RELATED MATERIAL FLAMMABLE LIQUID NA	1263		
T/T Reclaim Wash Thinner			
2000 Gal@ 74°F Comp No. 1			

Subject to Section 7 of Conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(signature of consignor.)

If charges are to be prepaid, write or stamp here, "To be Prepaid".

TO BE PREPAID

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

Thomas RB Langenfeld

RCRA CONFIDENTIAL BUSINESS INFORMATION Does Not Contain National Security Information (E.O. 12065).

shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.
TE-Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
reed or declared value of the property is hereby
ally stated by the shipper to be not exceeding $ _____ Per _____

_____ Shipper, Per _____ Agent _____

ıanent Post Office Address of Shipper

TES-IV-M01-0505-03-FW-0009

4

ark with "X" to designate Hazardous Materials as defined in the Department of Transportation Regulations governing the transportation of hazardous materials. The use of this column is an optional method for identifying hazardous materials on bills of lading per Section 172.201(a)(1)(iii) of Title 49, Code of Federal Regulations. Also, when shipping hazardous materials, the shipper's certification statement prescribed in Section 172.204(a) of the Federal Regulations must be indicated on the bill of lading, unless a specific exception from this requirement is provided in the Regulations for a particular material.

ATTACHMENT VII

Photographs of Site

Table of Contents

		PAGE
1.0	INTRODUCTION	1
2.0	PARTICIPANTS	1
3.0	INSPECTION PROCEDURES	1
4.0	FACILITY DESCRIPTION AND F-SOLVENT WASTES ACTIVITIES	2
	4.1 RCRA STATUS	3
	4.2 DISPOSAL FACILITIES	3
5.0	RECORDS REVIEW	5
	5.1 MANIFESTS	5
6.0	SITE INVESTIGATION	6
7.0	FINDINGS AND CONCLUSIONS	7

LIST OF ATTACHMENTS

ATTACHMENT I - FACILITY MAP

ATTACHMENT II - ENVIROSAFE SERVICES OF OHIO, INC.

ATTACHMENT III - MANIFEST OF 80 DRUMS LAND DISPOSED

ATTACHMENT IV - MANIFESTS OF WASTE TO BE RECLAIMED OR FUEL BLENDED

ATTACHMENT V - MANIFEST OF HAZARDOUS WASTE DERIVED FUEL

ATTACHMENT VI - SHIPMENT OF RECLAIMED SOLVENTS

ATTACHMENT VII - PHOTOGRAPHS OF SITE

ATTACHMENT VIII - DRAFT RCRA F-SOLVENT LAND RESTRICTION TREATMENT STORAGE AND DISPOSAL REQUIREMENTS AND GENERATORS CHECKLISTS

1.0 INTRODUCTION

On September 30, 1987, a Land Disposal Restriction (LDR) inspection was performed by a Technical Enforcement Support (TES) IV contractor under Contract No. 68-01-7351 Work Assignment No. 505, for the U.S. Environmental Protection Agency (U.S. EPA), Region V. The inspection was conducted under the authority of section 3007 of the Resource Conservation and and Recovery Act (RCRA), as amended.

This investigation was required to assess the level of compliance to the Land Disposal Restrictions set forth November 8, 1986. These restrictions prohibit the land disposal of F001-F005 waste solvents. The purpose of this investigation was to review only the management practices of these particular waste solvents.

Following the evaluation of the facility, this letter report will be submitted to the U.S. EPA. At that time, the U.S. EPA will make a determination of compliance or violation with respect to the LDR. This report, documentation from the facility and site photographs will be utilized for the determination.

2.0 PARTICIPANTS

The Inspection of American Chemical Services F-solvent wastes management practices was conducted on September 30, 1987. Jack Kratzmeyer and Margaret Murdock of Metcalf & Eddy, Inc., (TES IV contractors) subcontractor to Jacobs Engineering Group Inc., conducted the inspection. The TES IV contractors were met by Mr. James Tarpo, President of American Chemical Services.

3.0 INSPECTION PROCEDURES

Upon arrival at American Chemical Services (the facility) the TES IV contractors met with Mr. Tarpo to discuss the purpose and format of the LDR inspection. It was also explained that the facility was entitled to declare certain information as Confidential Business Information (CBI). Mr. Tarpo claimed CBI for the information transmitted to the TES IV contractors during the inspection.

During the initial in-briefing, Mr. Tarpo gave a brief description of the activities presently occurring at the facility. The inspection consisted of two parts: a review of relevant documents and a visual inspection of the facility. At the end of the inspection, the TES IV contractors reviewed their observations with Mr. Tarpo.

4.0 FACILITY DESCRIPTION AND F-SOLVENT ACTIVITIES

As described by Mr. Tarpo, American Chemical Services (ACS), is a custom chemical manufacturer, a solvent reclaimer and a hazardous waste processor. Their products are fuel additives, plasticizers and resins, rejuvenated solvents and hazardous waste derived fuel.

This investigation is primarily concerned with the management of spent solvents. Therefore, the chemical manufacturing aspect of the facility will only be reviewed in as much as F-solvent wastes are generated in the processes. The spent F-solvents resulting from the distillation of spent organic products are regulated under the LDR.

Spent F-solvents are reclaimed, and rejuvenated solvents are sold by this facility. In the distillation of spent solvents, still bottoms are generated. These still bottoms are regulated under the LDR. However, the reclaimed solvents are considered new products and therefore not regulated under the LDR. This is standard U.S. EPA policy for the reclamation of a hazardous waste. The reclaimed waste is always considered a new product, thus no longer regulated as a waste.

Finally, the still bottoms generated in chemical manufacturing and solvent reclamation are blended with spent solvents and sold as hazardous waste derived fuel. This product is considered hazardous waste fuel utilized for energy recovery and is regulated by 40 CFR 266 Subpart D. Therefore, the generation, storage and transport of hazardous waste burned for energy recovery is regulated by the LDR.

The facility manages spent solvents in three different on-site locations. Please refer to the map in Attachment I.

The first location is the drum storage area, location A. Drums of spent F-solvent waste are managed in this area. The piping configuration at the drum storage dock permits the transfer of waste solvents from the drums to either the distillation/reclamation or fuel blending operation areas. A mixing vessel is adjacent to the drum building. In this vessel solid, F-solvent wastes are dissolved in liquid F-solvent wastes. This material is transferred to the fuel blending area. The empty drums are RCRA cleaned and sold to a drum salvage company.

Location B includes the reclaimed solvent tank farm, the reclaim facility and the rejuvenated solvent drum filling

dock. Tank trucks containing spent solvent are unloaded and the solvent is stored prior to reclamation. The solvents are recycled and the rejuvenated product is pumped into drums, while the still bottoms are piped to the fuel blending area.

Location C is the waste fuel tank farm. Spent solvents and still bottoms are blended in these tanks. Approximately, three 20,000 gallon railroad tank cars of hazardous waste to be burned for energy recovery are shipped offsite per month.

4.1 RCRA Status

American Chemical Services (the facility) had notified the U.S. EPA of their hazardous waste activity in August, 1980. At this time, the facility received the identification number IND 016360265. The facility currently operates under interim status for the storage and treatment of hazardous waste. The facility also generates hazardous waste in its manufacturing processes. The facility had filed a RCRA part B application in August 1985. It is currently under review for final licensing as a storage and treatment facility.

4.2 Disposal Facilities

The facility does not dispose of hazardous waste onsite. Therefore, it has entered into several contractual agreements with disposal facilities.

Envirosafe Services of Ohio, land disposes the paint waste stream that the facility transports and stores for its customers. Since these streams are land disposed, Envirosafe wanted to be assured that none of the wastes were F-solvent wastes. Please refer to the documents of Attachment II. The June 17, 1987 letter from Envirosafe to Mr. Jim Tarpo initiated the investigation of these paint waste streams as possible F-solvent wastes. Prior to the November 8, 1986 restrictions, Envirosafe had permitted and accepted waste from ACS. This waste stream was manifested as paint waste, EPA waste identification D001. This designation means a solid waste that exhibits the characteristic of ignitability, but is not listed as a hazardous waste in Subpart D, 40 CFR 261. However, after the effective date of the LDR, Envirosafe refused to accept the paint waste until ACS could assure that the waste was indeed a D001 waste and contained no F-solvent constituents.

Mr. Tarpo complied with the requests Envirosafe made upon ACS regarding the paint waste. ACS required the generators to certify that their wastes were D001 wastes. Hazardous Waste Generator Survey's were also used to characterize the waste as D001. However, no waste analysis was performed to exclude F001-F005 spent solvent constituents as part of these wastes. Attachment III contains the first shipment of paint waste to Envirosafe since the LDR effective date.

The shipment contained 80 drums of waste received from a variety of generators and compounded by ACS. The following is an explanation of the drum processing practices of ACS and these 80 drums make a good example.

When a waste is received by ACS in drums, the material is reviewed for its potential as a waste fuel. Whatever can be pumped out of the drums, or redissolved into solution is transferred to the waste fuel tank farm. However, some nonpumpable solids remain in the drums and must be disposed. Envirosafe receives drums that are composites of many different drums from various generators. Please refer again to Attachment III for the manifests of shipments of these drums to ACS and the composition lists of the drums shipped to Envirosafe.

However, a question regarding the proper identification of the waste that is shipped to Envirosafe for land disposal must be resolved. This problem is best demonstrated with manifest IN 100607 from Ford Motor Company to ACS (Attachment III). The waste from Ford was shipped in drums and identified as D001 waste. However, the material was additionally described as containing F003 and F005 wastes on the manifest.

The waste from Ford was used by ACS for its value in fuel blending. However residual waste that could not be utilized had to be disposed. Therefore, ACS combined the residual Ford waste with similar waste from other generators and had the waste landfilled at Envirosafe. The waste was identified as D001 waste on manifest INA 0160127 (Attachment III).

However, the concern is that the waste sent to Envirosafe might have been improperly identified as D001. According to the Hazardous Waste Generator Surveys concerning the waste shipped by Ford, the waste contains a mixture of materials. This mixture is greater than ten percent total F-solvent constituents (Attachment III).

Please be advised that the waste analysis does not directly relate to the waste accepted by ACS under manifest IN100607. The analysis was performed on a representative sample of the waste stream generated at Ford and accepted by ACS.

However, it does appear that many waste streams accepted by ACS should be identified as F-wastes, but are being identified as D001 waste by the generators. If this is true, the management of these waste streams must comply with the LDR.

The second land disposal facility that ACS is negotiating with is CID Landfill, CWM in Calumet City, IL. The waste stream to be disposed is solvent coated gravel from incidental spills that result from handling during the reclamation process. The waste is currently under review at CID Landfill. The waste profile sheet supplied to CID by ACS indicates that the waste contains less than 1% of F001-F005 solvents.

Finally, the facility is pursuing a permit with Marine Shale Processors, Inc. This permit would insure that any F-solvent wastes exceeding treatment standards, managed by the facility, that could not be reclaimed or blended as a fuel, would be incinerated.

At this time, Envirosafe Services of Ohio is accepting and land disposing paint waste from ACS. The permits and contracts with CID Landfill and Marine Shale Processors, Inc. are still under review. However, ACS had, at the time of inspection, 10 drums of F-solvent waste requiring incineration.

5.0 Records Review

5.1 Manifests

The facility accepts F-solvent wastes in drums and tankers. The generators prepare the manifests for these shipments. Three examples of the incoming manifests are included in this report as Attachment IV. Under CFR 268.7, for each shipment of waste exceeding treatment standards, the generator must notify the treatment facility of the appropriate treatment standard set forth in Subpart D of 40 CFR 268. The notice must include the following information; the EPA Hazardous Waste Number, the corresponding treatment standard, the manifest number of the shipment and waste analysis data, if available.

The manifests in Attachment IV demonstrate that some generators are indeed including the required notifications (Manifest INA 0153622). However, many generators are not including these notifications (Manifest IN 054387 and IN 085976).

The only ACS product that is shipped from the facility that is also a hazardous waste is the hazardous waste derived fuel. This material contains F-solvents in concentrations exceeding treatment standards. An example manifest is included as Attachment V to this report. However, the required generator notification of 40 CFR 268 does not accompany this manifest for shipment.

Finally Attachment VI contains a bill of lading memorandum for the shipment of rejuvenated solvent product from the facility. This product is not a regulated hazardous waste.

6.0 Site Investigation

A visual inspection of the facility was performed. Please refer to the map in Attachment I. The TES IV contractors were shown the operations concerning F-solvent wastes occuring in locations A, B and C. Photographs in Attachment VII further documents the visual inspection.

The laboratory was also shown to the TES IV contractors. The facility receives approximately 2-3 bulk shipments via tanker truck per day. The lab performs fingerprint analysis to verify that the waste in the shipment matches the waste on the permit. Each incoming drum is also sampled and analyzed at the lab.

The two tank farms in locations B and C were in good condition. No tanks were leaking and no visible evidence of spills was observed.

The drum storage area has a capacity of 300 drums. Solid waste (non-pumpable) is stored outside, while liquids are stored inside. Many of these drums were in very poor condition. Some were leaking. Many labels were incomplete. The accumulation dates and EPA wastes ID numbers were omitted in many cases.

Additional F-solvent wastes are generated in the laboratory and from the distillation process. The drum of laboratory waste was outside the lab. It was properly labeled and did not exceed the 90-day accumulation period. The drums of waste generated in the distillation processes were not labeled. These were found in the

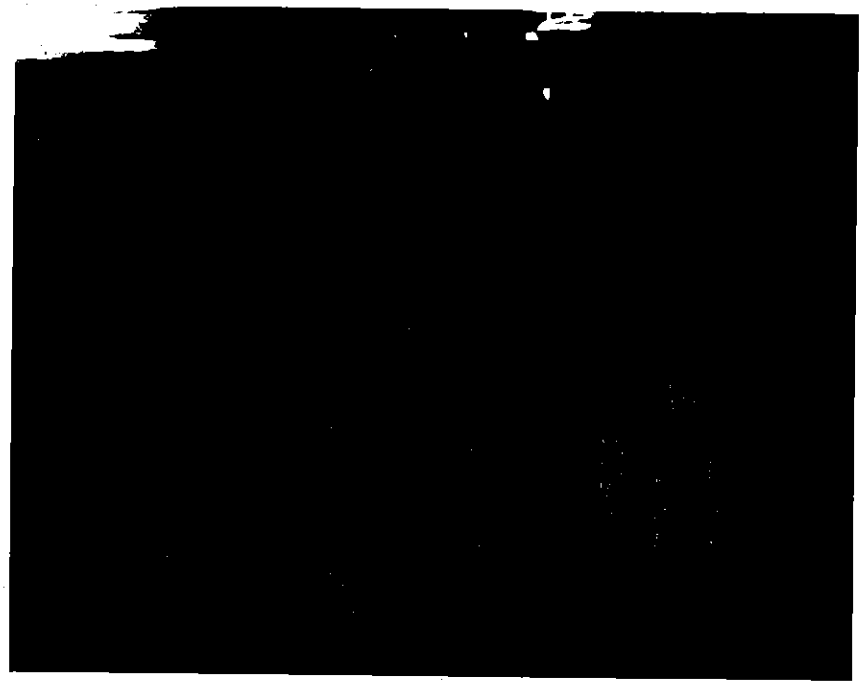
distillation operator's area. Mr. Tarpo told the TES IV contractors that these drums contained aqueous solvent waste. The aqueous material is redistilled and the remaining water is discharged into the city sewer system.

7.0 Findings and Conclusions

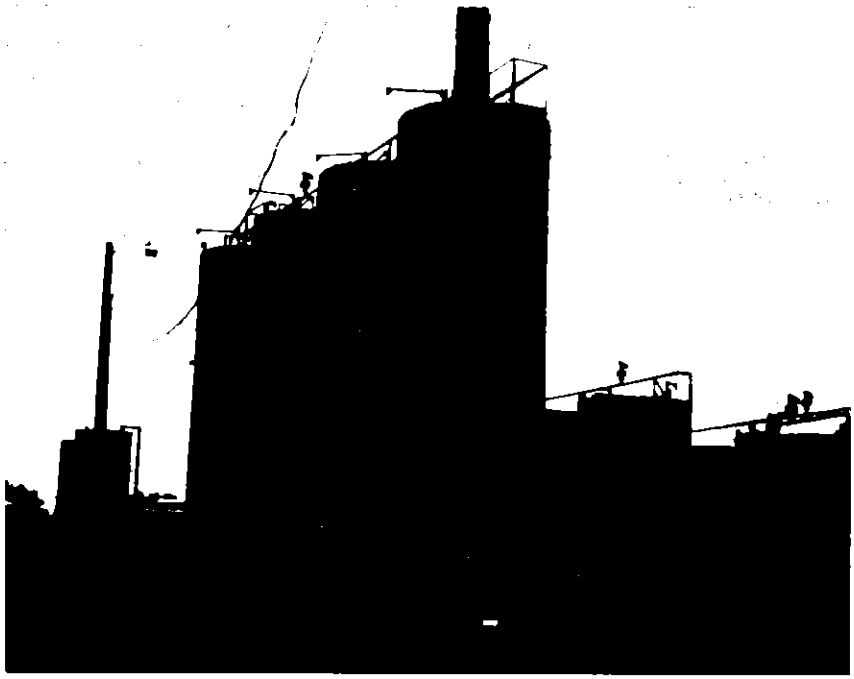
The Draft RCRA F-solvent Land Restriction Treatment, Storage and Disposal Requirements and the Generators Checklists were completed for those parts applicable to American Chemical Services. Sections of the checklists that are not applicable are so marked. The checklists are included as Attachments VIII to this reports.

It appears as that the facility is in violation of 40 CFR 268.7, which requires that they notify the treatment facility of the applicable treatment standards for the F-solvent wastes being shipped from their facility. The F-solvent waste of concern is the hazardous waste to be burned for energy.

The proper identification, by the generators, of the waste streams accepted by ACS that are eventually landfilled, may not have been made. The generators identify the waste as D001, but say they contain F-solvent constitituents. However, waste analysis has not been performed to make a proper determination of waste code.

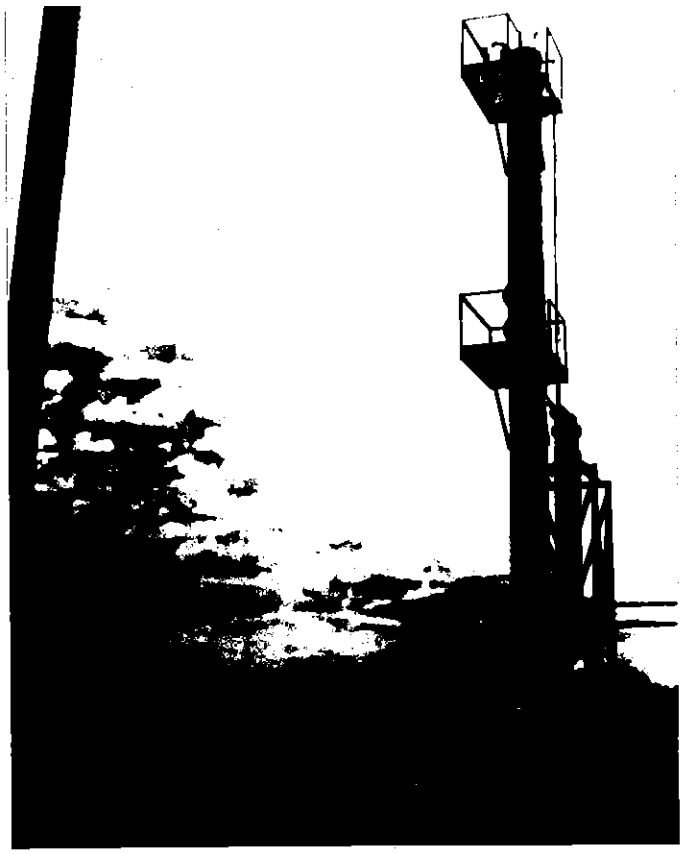


LOCATION A Drums in storage area



LOCATION B Reclaim facility tank farm

LOCATION B Reclaim Facility, Aqueous Distillation Process



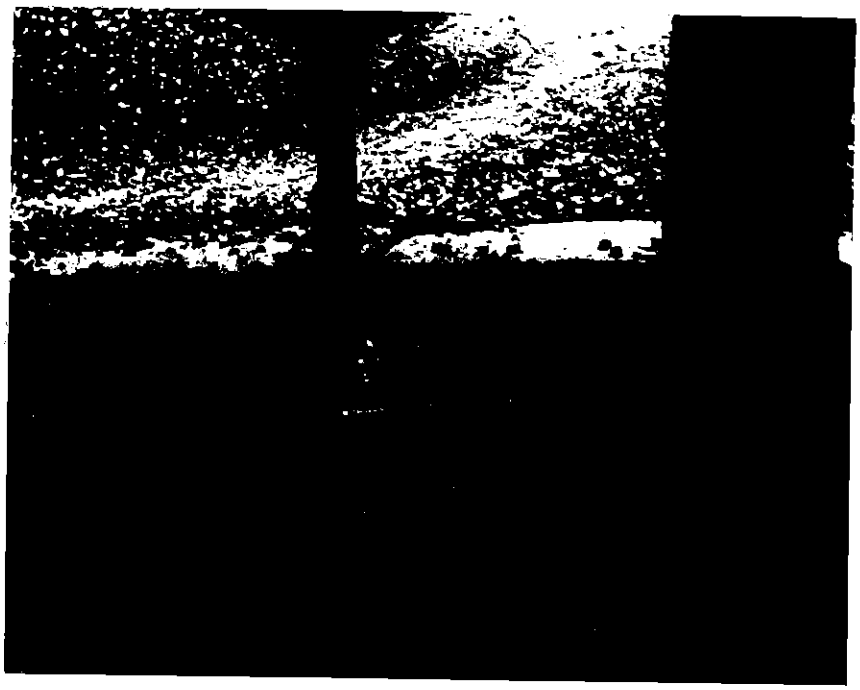
LOCATION B Reclaim Facility, Aqueous Distillation Process

LOCATION A Drum Storage Area

LOCATION A Drum Storage Area

Piping Configuration in foreground
Mixing tank in background

LOCATION B Reclaim facility unloading area



LOCATION B Label of tank in reclaim facility tank farm

LOCATION C Waste Fuel Tank Farm

LOCATION C Waste Fuel Tank Farm Unloading Area

ATTACHMENT VIII

Draft RCRA F-Solvent Land Restriction Treatment, Storage and Disposal Requirements and Generators Checklists

RCRA CONFIDENTIAL
BUSINESS INFORMATION
Does Not Contain National
Security Information (E.O. 12065)

Facility Name: American Chemical Services
ID Number: IND 016 360 265
Inspector: Kratzmeyer / Murdock
Date: 9/30/97

DRAFT
RCRA F-SOLVENT LAND RESTRICTION
TREATMENT, STORAGE, AND DISPOSAL REQUIREMENTS CHECKLIST

TES-IV-M01-0505-03-R-0002

I. FACILITY IDENTIFICATION

American Chemical Services 420 So. Colfax Ave.
A. Facility Name B. Street (or other identifier)

Griffith IN 46319 LAKE
C. City D. State E. Zip Code F. County Name

EPA Interim Status Storage/Treatment
- Chemical manufacturer
- Solvent reclaimer
- Hazardous waste derived fuel producer
G. Nature of business; identification of operations

IND016360265
H. EPA ID #

JIM TARPO 219-924-4370
I. Facility Contact (Name and Phone Number)

II.A. For onsite facilities, complete the generator checklist — Comments

B. General Facility Standards

1. Was waste analysis plan revised to cover Part 268 requirements [264.13 or 265.13]? ___Yes ___No — NA

2. Did facility obtain representative chemical and physical analysis of wastes and residues [264.13(a)/265.13(a)]? ___Yes ___No — NA

   a. Did testing include analyses for all F001-F005 constituents? ___Yes ___No — NA

   b. Were analyses performed using TCLP? ___Yes ___No — NA

   c. Were analyses conducted onsite or offsite (identify offsite lab)? ___On ___Off: — NA

   d. Describe frequency of sampling _____ — NA

   e. Describe procedures used to identify manifest discrepancies _____ — NA

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]? ✓Yes ___No

Facility Name: American Chemical Service
ID Number: IND 016360265
Inspector: Kratzmeyer / Murdock
Date: 9/30/87

C. Storage [268.50]

Comments

1. a. Were restricted wastes exceeding treatment standards stored? ✓ Yes ___ No

If no, go to "D."

b. Are all containers clearly marked to identify content and date(s) entering storage? ___ Yes ✓ No

c. Do operating records track the location, quantity and dates that waste exceeding treatment standards entered and were removed from storage? ✓ Yes ___ No

d. Do operating records agree with container labeling? ___ Yes ✓ No

e. Is waste exceeding treatment standards stored for less than 1 year? ✓ Yes ___ No

If yes, can you show that such accumulation is not necessary to facilitate proper recovery, treatment, or disposal? ___ Yes ✓ No

If yes, state how: _____

Drums in drum storage area were not completely labeled. Accumulation date and EPA waste ID nos. were omitted in many instances. Drums in distillation area were not labeled at all.

f. Were tanks emptied at least once per year, and do operating records show that volume of waste removed from tanks annually at least equals tank volume? ___ Yes ✓ No

g. Was/is waste exceeding treatment standards stored for more than one year? ___ Yes ✓ No

If yes, state the owner/operator's proof that such storage was solely for the purposes of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal: _____

Tanks are not emptied and cleaned. However, the tanks are continually being filled and emptied from bottom. Not a great possibility for sludge build-up.

h. Are F-solvent wastes exceeding treatment standards "stored" in surface impoundments? ___ Yes ✓ No

D. Treatment in Surface Impoundments [268.4]

1. Were F001-F005 wastes exceeding treatment standards placed in surface impoundments for treatment? ___ Yes ✓ No

If no, go to E.

Facility Name: American Chemical Services
ID Number: IND 016360265
Inspector: Kratzmeyer / Murdock
Date: 9/30/87

Comments

2. Did the facility submit a certification of compliance with minimum technology and ground water monitoring requirements, and the waste analysis plan to the Agency? ___Yes ___No

3. Have the minimum technology requirements been met? ___Yes ___No

   a. If the minimum technology requirements have not been met, has a waiver been granted for that unit(s)? ___Yes ___No

4. Have the Subpart F ground-water monitoring requirements been met? ___Yes ___No

5. Have representative samples of the sludge and supernatant from the surface impoundment been tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan and are the results in the operating record [264.13/265.13] and [264.73/265.73]? ___Yes ___No

6. Did the hazardous waste residue (sludge or liquid) exceed the treatment standards specified in [268.41]? ___Yes ___No

7. Provide the frequency of analyses conducted on treatment residues: _____

8. Does the operating record adequately document the results of waste analyses performed in accordance with [268.41] and [264.73/265.73] ___Yes ___No

9. Have the hazardous waste residues that exceed the treatment standards [268.41] been removed adequately and on an annual basis? ___Yes ___No

   a. If answer is no and supernatant is determined to exceed treatment concentrations, is annual throughput greater than impoundment volume? ___Yes ___No

10. If residues were removed annually, were adequate precautions taken to protect liners and do records indicate that inspections of liner integrity are performed? ___Yes ___No

11. When removed, were solvent wastes managed subsequently in another surface impoundment? ___Yes ___No

Facility Name: American Chemical Service
ID Number: IND 016360265
Inspector: Kratzmeyer / Murdock
Date: 9/30/89

Comments

12. When removed, were wastes treated prior to disposal? ___Yes ___No

a. If yes, are waste residues treated on or offsite? ___Onsite ___Offsite

b. Identify management method _____

E. Treatment

1. Did the facility operate treatment facilities for F-solvent waste (not including surface impoundments)? ✓Yes ___No

If no, go to "F."

2. Describe the treatment processes for F-solvent wastes.
(1) Distillation to Regenerate solvents
(2) Blending of solvents and still bottoms to produce Hazardous waste derived fuel.

3. Does the facility, in accordance with an acceptable waste analysis plan, verify that the residue extract from all treatment processes for the F-solvent wastes are less than treatment standards [268.7(b)(2)]? ___Yes ✓No CLAIMS NO RESIDUE

4. Describe frequency of testing of treatment residuals.
NA

5. Was dilution used as a substitute for treatment [268.3]? ___Yes ✓No

6. Are certifications and results of waste analyses kept in the operating record [264.73(b)(3)/265.73(b)(3)] and [268.7(c)]? ___Yes ✓No NA

7. Are notice with waste number, treatment standard, manifest number, and analytical data (where available) submitted for each shipment of waste or treatment residual that meets the treatment standard stating that waste has been treated to treatment performance standards [268.7(b)]? ___Yes ✓No NA

8. Are certifications submitted for each shipment [268.7(b)(2)(i)]? ___Yes ✓No NA

Facility Name: American Chemical Serv.
ID Number: IND 016360265
Inspector: Kratzmeyer/Murdock
Date: 9/30/87

F. Land Disposal

Comments

1. Were F-solvent wastes placed in land disposal units (landfills, surface impoundments [for this question, do not include if in "D"] waste piles, wells, land treatment units, salt domes/beds, mines/caves concrete vault or bunker?
___Yes ✓No

2. Did facility have the notice and certification from generators/treaters in its operating record [268.7(c); 268.7(a),(b)]?
___Yes ___No

3. Did the facility obtain waste analysis data through testing of the waste to determine that the wastes are in compliance with the applicable treatment standards [268.7(c)]?
___Yes ___No

If yes, at what frequency?_____

4. Were F-solvent wastes exceeding the treatment standards placed in land disposal units excluding national capacity variances [268.30(a)]?
___Yes ___No

If yes, did facility have an approved waiver based on no migration petition [268.6] or approved case-by-case capacity extension [268.5] or treatment standard variance [268.44]?
___Yes ___No

5. Were F-solvent wastes subject to a national or case-by-case capacity variance/extension disposed?
___Yes ___No

a. If yes, were these wastes disposed of in a facility that has a new, replacement, or laterally expanded landfill or impoundment?
___Yes ___No

If (a) is yes, have the minimum technology requirements been met for all such units at the facility [268.5(h)(2)] and [268.30(b)]?
___Yes ___No

6. Were adequate records of disposal maintained?
___Yes ___No

7. If wastes subject to a nationwide variance [268.30], case-by-case extensions [268.5], or no migration petitions [268.6] were disposed, does facility have notices [268.7(a)(3)] and records of disposal?
___Yes ___No

8. What is the volume of F-solvent waste disposed to date by waste?_____

Facility Name: American Chemical Service
ID Number: IND 016360265
Inspector: Kratzmeyer / Murdock
Date: 9/30/87

9. If the facility has a case-by-case extension, can the inspector verify that the facility is making progress as described in progress reports [268.5]?

___Yes ___No

Comments

Inspector: American Chemical Service
Address: IND 016360265
Kratzmeyer / Murdock
Telephone No: 9/30/87

DRAFT
RCRA LAND RESTRICTION F-SOLVENT
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

American Chemical Services — A. Handler Name
420 S. Colfax Ave. — B. Street (or other identifier)
GRIFFITH — C. City
IN — D. State
46319 — E. Zip Code
LAKE — F. County Name
EPA Interim Status Storage/treatment - chemical manufacturer - solvent reclaimer - hazardous waste derived fuel producer — G. Nature of Business; Identification of Operations
IND 016360265 — H. EPA ID #
Jim TARPO 219-924-4370 — I. Handler Contact (Name and Phone Number)

II. GENERATOR COMPLIANCE

A. F-Solvent Identification

1. Does the handler generate the following wastes?

a. F001 ✓ Yes ___ No

b. F002 ✓ Yes ___ No

c. F003 ✓ Yes ___ No

If an F003 wastestream listed solely for ignitability has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? ___ Yes ___ No NA

d. F004 ___ Yes ✓ No

e. F005 ✓ Yes ___ No

2. Source of the above: Form 8700-12 ✓; Part A ___; Part B ___; other (specify) ___

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A. Note concerns below: _____

Handler Name: American Chemical Services
ID Number: IND 016360265
Inspector: Kratzmayr R / MURDOCK C
Date: 9/30/87

B. BDAT Treatability Group - Treatment Standards Identification — Comments

1. Did the generator correctly determine the appropriate treatability group [268.41] of the waste (Wastewaters containing solvents, pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

___Yes ___No NA

C. Waste Analysis

1. Did the generator determine whether the waste exceeds treatment standards based on [268.7(a)]:

a. Knowledge of wastes ✓ Yes ___No

b. TCLP ___Yes ___No

c. Other (specify)_____

If knowledge, note how this is adequate: Waste has been characterized with GC analysis for solvent content.

If determined by TCLP, provide date of last test, frequency of testing, and attach test results.

Dates/frequency:_____

Note any problems:_____

d. Were wastes tested using TCLP when a process or wastestream changed?

___Yes ___No

2. Did the F-solvent wastes exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]? ✓ Yes ___No ___Some

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [268.3] ___Yes ✓ No

D. Management

1. Onsite management

a. Were F-solvent wastes managed onsite? ✓ Yes ___No

If yes, answer 1(b) and (c); if no, answer 2.

Handler Name: American Chemical Services
ID Number: IND016360205
Inspector: Kratzmeyer/Murdock
Date: 9/30/87

Comments

b. For wastes that exceed treatment standards, was treatment, storage, and/or disposal conducted?
✓ Yes ___ No

treatment and storage TSDF checklist is

If yes, TSDF Checklist must be completed.

c. Are test results maintained in the operating record [264.74(b)3/265.73(b)(3)]?
___ Yes ___ No NA

2. Offsite Management

a. If F-solvent wastes exceed treatment standards, did generator provide treatment facility [268.7(a)(1)]:

(i) EPA waste number? ✓ Yes ___ No

(ii) Applicable treatment standard? ___ Yes ✓ No

(iii) Manifest number? ✓ Yes ___ No

(iv) Waste analysis data, if available? ___ Yes ✓ No

Identify offsite treatment facilities CID LANDFILL AND Marine Shale Processors will be used in the future.

b. If F-solvent wastes did not exceed treatment standards, did generator provide the disposal facility [268.7(a)(2)]:

NA

(i) EPA Hazardous waste number? ___ Yes ___ No

(ii) Applicable treatment standard? ___ Yes ___ No

(iii) Manifest number? ___ Yes ___ No

(iv) Waste analysis data, if available? ___ Yes ___ No

(v) Certification that waste meets treatment standards? ___ Yes ___ No

Identify land disposal facilities receiving the BDAT certified wastes _____

NA

Handler Name: American Chemical Services
ID Number: IND016302665
Inspector: Kratzmeyer / Murdock
Date: 9/30/87

Comments

c. If waste is subject to nationwide variance [268.30] (e.g., solvent-water mixtures less than 1%), case-by-case extension [268.5] or petition [268.6] does generator provide notice to disposer that waste is exempt from land disposal restrictions [268.7(a)(3)]?

___Yes ___No

NA

E. Storage of F-Solvent Waste

1. Was F-solvent waste stored for greater than 90 days (after variance 180/270 days for SQG) [268.50(a)(1)]?

✓ Yes ___No

If yes, was facility operating as a TSD under interim status or final permit? ✓ Yes ___No

If yes, TSDF Checklist must be completed.

TSDF Checklist is attached

F. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes?

___Yes ✓ No

If yes, list type of treatment unit and processes

_____

_____

_____

If the residuals from a RCRA-exempt treatment unit are above the treatment standards, the owner/operator is considered a generator of restricted waste. The inspector should determine whether the generator requirements, particularly waste identification requirements, have been met for the treatment residuals.

RCRA CONFIDENTIAL BUSINESS INFORMATION
Does Not Contain National Security Information (E.O. 12065).
TES-IU-M01-0505-03-R-0002

121

TSD RCRA Inspection Report

EPA Identification Number: I N D 0 1 6 3 6 0 2 6 5

Installation Name: American Chemical Services

Location Address: P. O. Box 190

City: Griffith ZIP 46319

Date of Inspection: 2/2/87 + 4/15/87 Time of Inspection —

Person(s) interviewed *	Title	Telephone
James Tarpo	President	(219) 924-4300

Inspector(s)	Agency	Telephone
Lewis R. Schoenberger	IDEM	(317) 232-4314

* Please identify correspondence contact

Installation Processes by Process Code (EPA Form 3510-3)

S01	✓ Container storage	S02	✓ Tank storage
S03	___ Waste Pile storage	S04	___ Surface impoundment storage
D79	___ Injection well disposal	D80	___ Landfill disposal
D81	___ Land Application disposal	D83	___ Surface Impoundment disposal
T01	___ Tank Treatment	T02	___ Surface Impoundment treatment
T03	___ Incinerator treatment	T04	✓ Other

If Part A process codes are listed above as T04 please describe the process involved below.

Other activities

Generator ✓
Appendix GN

Transporter ___
Appendix TR

1. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

2. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

1. Verify EPA I.D. No. IND 016 360 265

2. Type of Facility (G, T, TSD) based on inspection Gen, Treatment, Storage

3. Type of Operation, Products Manufactured, Processes Utilized, Size of Operation. Concentrate on processes that produce waste (hazardous or non-hazardous)!

This facility is a custom chemicals manufacturer of fuel additives and plasticizers. ACS also reclaims spent hazardous waste solvents, both listed and D001 by redistillation. Still bottoms and other ~~[illegible]~~ ignitable wastes are blended with oils to produce a hazardous waste derived fuel.

4. Hazardous Waste Streams/EPA #

Streams/EPA #	Source	Rate	Disposition
Paint solids (D001)	solids from drums	~4-5 hundred/year	Fondessy, Oregon, OH
Charcoal filter, Drum liners + clothing (D001)	—	~50 drums/year	Adams Center, L.F.
Still bottoms from assorted listed and D001 characteristic waste	—	—	fuel blending

5. Exempted/Excluded Hazardous Waste Streams and Reason for Exemption

none

6. Hazardous Waste

On-Site	Amount	How Stored	Comments
F001	201	55 gallon drums	
F001 2	121	55 gallon drums	
F002			

7. Has the capacity of the storage areas listed on the Part A exceeded that allowed? List the type and amount of actual storage capacity overages.
320 IAC 4.1-38-2

no

8. Indicate any TSD activities which have been omitted from or are not clear on the facility map (for the purpose of determining if expansion has occured)

none

9. Is the Annual Report Accurate? yes

10. List Transporters Used by the Company

Mr. Frank Inc. ID 069506160

11. Non-Hazardous

Waste Streams	Source	Rate	Disposition
Condensate water	polymerization operation	~10,000 gal.	Chem Clear treatment Chicago, Il.

Can the Company Document Questionable Waste Streams are Non-Hazardous as Claimed?

12. Note any non-RCRA Violations (Open Dumping, Dumping in City Sewer Without Pretreatment Program, OSHA, etc.) Land disposal sites already being addressed under CERCLA Superfund.

13. Additional Comments

General Facility Standards (paperwork)

	YES	NO	NI
1) Has the Regional Administrator/Environmental Management Board been notified regarding:			
a. Receipt of hazardous waste from a foreign source? 40 CFR 265.12(a) (320 IAC 4.1-16-3)		N/A	
b. Facility expansion? 40 CFR 270.72(b) (320 IAC 4.1-19-3)		N/A	
c. Change of owner or operator? 40 CFR 265.12(b) (320 IAC 4.1-16-3)		N/A	

2) General Waste Analysis:

	YES	NO	NI
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste? 40 CFR 265.13(a)1 (320 IAC 4.1-16-4)	✓		
b. Does the owner or operator have a detailed waste analysis plan on file at the facility? 40 CFR 265.13(b) (320 IAC 4.1-16-4)	✓		
Does the waste analysis plan contain:			
1. parameters (and rationale for their choice)	✓		
2. test methods	✓		
3. sampling method for representative sample	✓		
4. frequency of analysis (and rationale)	✓		
5. off-site only: waste analysis from generators	✓		
6. Additional waste analysis needed (when a change in waste type or process occurs)			
a. 265.193 (320 IAC 4.1-24-3)Tanks (see above)		N/A (1)	
b. 265.225 (320 IAC 4.1-25-4)Impoundment (same as above)		N/A	
c. 265.252 (320 IAC 4.1-26-3)Waste Pile (same as above)		N/A	
d. 265.273 (320 IAC 4.1-27-3)Land Treatment (same as above)			✓ (2)
e. 265.341 (320 IAC 4.1-29-2)Incinerators (same as above)		N/A	
f. 265.375 (320 IAC 4.1-30-3)Thermal Treatment (same as above)		N/A	
g. 265.402 (320 IAC 4.1-31-3)Other Treatment (same as above)			✓ (2)

(1) Neither a change in the wastes handled or processes has occurred, according to Mr. Taylor.

(2) May be subject to CERCLIS or superfund activity requirements.

	YES	NO	NI
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? 40 CFR 265.13(c) (320 IAC 4.1-16-4)	✓		

3) Owner or Operator Inspections:

	YES	NO	NI
a. Does the owner or operator inspect the facility for deterioration, malfunctions, operator errors, and discharges of hazardous waste that may affect human health or the environment? 40 CFR 265.15(a) (320 IAC 4.1-16-6)	✓		
b. Does the owner or operator have an inspection schedule at the facility? 40 CFR 265.15(b)2 (320 IAC 4.1-16-6)	✓		
c. If so, does the schedule address the inspection of the following items: 40 CFR 265.15(b)1 (320 IAC 4.1-16-6)			
i. monitoring equipment?	✓		
ii. safety and emergency equipment?	✓		
iii. security devices (including fences)?	✓		
iv. operating and structural equipment (ie. dikes, pumps, etc.)?	✓		
v. type of problems to be looked for during the inspection (e.g. leaky fittings, defective pump, etc.)? 40 CFR 265.15(b)(2) (320 IAC 4.1-16-6)	✓		
vi. inspection frequency (based upon the possible deterioration rate of the equipment)? 40 CFR 265.15(b)(4) (320 IAC 4.1-16-6)	✓		

	YES	NO	NI
vii. Must include:			
1. Weekly container storage? (See 265.174) (320 IAC 4.1-23-5)	✓		
2. Daily and Weekly Tank Storage? (See 265.194) (320 IAC 4.1-24-4)	✓		
3. Daily freeboard and weekly dike inspection for surface impoundments? (See 265.226) (320 IAC 4.1-25-5)		N/A	
4. Landfills, Thermal treatment, Chemical, Physical, and Biological treatment should be inspected as determined by deterioration rate and daily at loading and unloading areas (where spills are likely) [See 265.15(b)(4) (320 IAC 4.1-16-6)]		N/A	
d. Does Owner or Operator follow the written inspection schedule as outlined? 265.15(b)(1) (320 IAC 4.1-16-6)	✓		
e. Are areas subject to spills inspected daily when in use? 265.15(b)(4) (320 IAC 4.1-16-6)	✓		
f. Does the owner or operator maintain an inspection log or summary of owner or operator inspections? 40 CFR 265.15(d) (320 IAC 4.1-16-6)	✓		
g. Does the inspection log contain the following information: 40 CFR 265.15(d) (320 IAC 4.1-16-6)			
i. the date and time of the inspection?	✓		
ii. the name ot the inspector?	✓		
iii. a notation of the observations made?	✓		
iv. the date and nature of any repairs or remedial actions?		✓ (1)	

(1) Actions taken to repair the problems have not been described.

	YES	NO	NI
4) Do personnel training records include:			
a. Job titles for the positions related to HWM 40 CFR 265.16(d)1 (320 IAC 4.1-16-7)	✓		
b. The name of the employees filling each job title? 40 CFR 265.16(d)(1) (320 IAC 4.1-16-7)	✓		
c. Job descriptions including the required skills, education, or other qualifications and the duties of the personnel assigned to the position? 40 CFR 265.16(d)2 (320 IAC 4.1-16-7)	✓		
d. Description of both introductory and continuing training required for each job? 40CFR 265.16(d)(3) (320 IAC 4.1-16-7)	✓		
e. Records of training required in (d)? 40 CFR 265.16(d)4 (320 IAC 4.1-16-7)	✓		
f. Did facility pesonnel receive the required training including:			
i) classroom or on the job	✓		
ii) within 6 months of hire			✓ (1)
iii) annual review of training?	✓		
g. Are all training records maintained for current personnel and for at least three years for former employees? 40 CFR 265.16(e) [320 IAC 4.1-16-7(e)]	✓		

(1) Training was over looked at the time of inspection

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

	YES	NO	NI
1) Does the Contingency Plan contain the following information:			
a. The actions facility personnel must take to comply with 265.51 (4.1-18-2) and 265.56 (4.1-18-7) in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill-Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable).	✓		
b. Arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services 320 IAC 4.1-18-3	✓		
c. Names, addresses, and phone numbers of all persons qualified to act as emergency coordinators?	✓		
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? 40 CFR 265.52(e) (320 IAC 4.1-18-3)	✓		
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must decribe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.) 40 CFR 265.52(f) (320 IAC 4.1-18-3)	✓		
2) Emergency Coordinator:			
a. Is the facility Emergency Coordinator identified? 40 CFR 265.52(d) (320 IAC 4.1-18-3)	✓		
b. Is coordinator familiar with all aspects of site operation and emergency procedures? 40 CFR 265.55 (320 IAC 4.1-18-6)	✓		
c. Does Emergency Coordinator have the authority to carry out the Contingency Plan? 40 CFR 265.55 (320 IAC 4.1-18-6)	✓		

Preparedness and Prevention

	YES	NO	NI
1) Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility? 40 CFR 265.37 (320 IAC 4.1-17-7)	✓		
2) Are copies of the Contingency Plan available at the site and local emergency organizations? 40 CFR 265.53 (320 IAC 4.1-18-4)	✓		
3) Emergency Procedures If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56 (320 IAC 4.1-18-7)?		N/A	

MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING:

	YES	NO	NI
4) Use of Manifest System:			
a. Does the facility follow the procedures listed in 265.71 (4.1-19-2) for processing each manifest? (Particularly sending a copy of the signed manifest back to thegenerator within 30 days after delivery.)	✓		
b. Are records of past shipments retained for 3 years? 40 CFR 265.71(b)5 (320 IAC 4.1-19-2)	✓		
5) Does the owner or operator meet requirements regarding manifest discrepancies? (Off-site facilities only) 40 CFR 265.72 (320 IAC 4.1-19-3)	✓		

	YES	NO	NI
3) Operating Record:			
a. Does owner or operator have a operating record? 40 CFR 265.73(a)	✓		
b. Does the owner or operator maintain an operating record that contains the following information?			
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR 265 Appendix I (320 IAC 4.1-32-2)? 40 CFR 265.73(b)(1) (320 IAC 4.1-19-4)	✓		
ii. The location and quantity of each hazardous waste within the facility? (This information shall be cross referenced to a specific manifest number if the waste was accompanied by manifest.) 40 CFR 265.73(b)(2) (320 IAC 4.1-19-4)	✓		
iii. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross referenced to specific manifest number, if accompanied by a manifest.) 40 CFR 265.73(b)(2) (320 IAC 4.1-19-4)		N/A	
iv. Records and results of all waste analyses, trial tests, monitoring data, and operating inspections? 40 CFR 265.73(b)(3)(5)(6) (320 IAC 4.1-19-4)	✓		
v. Reports detailing all incidents that required implementation of the Contingency Plan? 40 CFR 265.73(b)(4) (320 IAC 4.1-19-4)		N/A	
vi. All closure and post closure costs as applicable? 40 CFR 265.73(b)(7) (320 IAC 4.1-19-4)	✓		

	YES	NO	NI
4) Unmanifested Waste Reports: (applies only to Off-site facilities)			
a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 (4.1-8-1) without a manifest or shipping paper? 40 CFR 265.76 (320 IAC 4.1-19-7)		✓	
b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type and date received for each unmanifested hazardous waste shipment.			
c. Has the facility submitted 8700-13B (unmanifested waste report)?			

6) Closure/Post-Closure:			
a. Is the closure plan available for inspection? 40 CFR 265.112(a) (320 IAC 4.1-21-3)	✓		
b. Is the post-closure plan available for inspection? (for disposal facilities only) 40 CFR 265.118(a) (320 IAC 4.1-21-8)		N/A①	

① For currently regulated RCRA TSD activities this is not applicable at this site.

PHYSICAL FACILITY INSPECTION

	YES	NO	NI
1) Security - Do security measures include: (If applicable)			
See 40 CFR 265.14 (320 IAC 4.1-16-5) for the following			
a. 24- hour surveillance? or		✓	
b. i. Artificial or natural barrier around facility? and	✓		
ii. Controlled entry?	✓		
c. Danger sign(s) at entrance?	✓		

Preparedness and Prevention:

Part 265 Subpart C

	YES	NO	NI
2) Maintenace and Operation of Facility			
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 40 CFR 265.31 (320 IAC 4.1-17-2)		✓	
3) If required, does the facility have the following equipment:			
a. Internal communications or alarm systems? 40 CFR 265.32(a) & 40 CFR 265.34(a) (320 IAC 4.1-17-3 & 5)	✓		
b. Telephone or 2-way radios at the scene of operations? 40 CFR 265.32(b) & 40 CFR 265.34(b) (320 IAC 4.1-17-3 & 5)	✓		
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic spinklers or water spray equipment available? (Please specify) 40 CFR 265.32(c) [320 IAC 4.1-17-3(c)]	✓		

	YES	NO	NI
3) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? 40 CFR 265.34(a) (320 IAC 4.1-17-5)		✓ (1)	
4) Testing and Maintenace of Emergency Equipment:			
a. Has the owner or operator established testing and maintenace procedures for emergency equipment? 40 CFR 265.33 (320 IAC 4.1-17-4)	✓		
b. Is emergency equipment maintained in operable condition? 40 CFR 265.33 (320 IAC 4.1-17-4)	✓		
5) Does the owner or operator maintain adequate aisle space for inspections, movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas) 40 CFR 265.35 (320 IAC 4.1-17-6)		✓ (2)	

(1) Personnel working in the drum storage area do not have immediate access to an alarm or communication device.

(2) In the drum storage area there were 4 rows of drums stacked next to one another, hence preventing access to the center 2 rows of drums.

Use and Management of Containers

40 CFR 265 Subpart I

	YES	NO	NI
1) Are containers in good condition? 40 CFR 265.170 (320 IAC 4.1-23-1)	✓		
2) Are containers compatible with waste in them? 40 CFR 265.172 (320 IAC 4.1-23-3)	✓		
3) Are containers managed to prevent leaks? 40 CFR 265.173(b) (320 IAC 4.1-23-4)	✓		
4) Are containers stored closed? 40 CFR 265.173(d) (320 IAC 4.1-23-4)		✓	(1)
5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). 40 CFR 265.176 (320 IAC 4.1-23-6)	✓		
6) Are incompatable wastes stored in separate containers? (If not the provisions of 265.17(b) apply) 40 CFR 265.177(a) (320 IAC 4.1-23-7)		N/A	
7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? 40 CFR 265.177(c) (320 IAC 4.1-23-7)		N/A	
8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 40 CFR 265.17(a) (320 IAC 4.1-16-8)			
a. Special handling?	✓		
b. No Smoking signs?	✓ (2)		
c. Separation and protection from ignition sources?	✓		
9) Does the container storage area have adequate aisle space so that containers can be inspected for leaks or deterioration without moving the containers during the inspection (about 2.5 feet)? 320 IAC 4.1-23-4(c)		✓	(3)

(1) ~~of~~ There were three 55 gallon drums stored with the bungs removed and a funnel in the bung. ~~of~~ These were closed in my presence.

(2) Posted at the facility entrance

(3) See note on previous page.

Tanks

40 CFR 265 Subpart J

	YES	NO	NI
1) Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 40 CFR 265.192(b) (320 IAC 4.1-24-2)	✓		
2) Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures? 40 CFR 265.192(c) (320 IAC 4.1-24-2)		N/A	
3) Do continuous feed systems have a waste-feed cut-off? 40 CFR 265.192(d) (320 IAC 4.1-24-2)		N/A	
4) Are reactive & ignitable wastes in tanks protected or rendered nonreactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 40 CFR 265.198 (320 IAC 4.1-24-6)	✓ ignitable		

5) Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?
40 CFR 265.198(b) (320 IAC 4.1-24-6)

Tank capacity: 309,700 gallons total

Tank diameter: varies feet per tank

Distance of tank from property line 105 feet

(See table 2-1 through 2-6 of NFPA's "Flammable and Combustable Liquids Code -1977" to determine compliance.)

6) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?
40 CFR 265.17(a) (320 IAC 4.1-16-8)

	YES	NO	NI
a. Special handling?		N/A	
b. No Smoking signs?	✓		
c. Separation and protection from ignition sources?	✓		

Surface Impoundments

40 CFR 265, Subpart K

	YES	NO	NI
1) Do surface impoundments have at least 60 cm (2 feet) or freeboard? 40 CFR 265.222 (320 IAC 4.1-25-2)			✓ ①
2) Do earthen dikes have protective covers? 40 CFR 265.223 (320 IAC 4.1-25-3)			
3) Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 40 CFR 265.229 (320 IAC 4.1-25-7)			
4) Are incompatable wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) 40 CFR 265.230 (320 IAC 4.1-25-8)			
5) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 40 CFR 265.17(a) (320 IAC 4.1-16-8)			
a. Special handling?			
b. No Smoking signs?			
c. Separation and protection from ignition sources?			

① There is a large pond on site which has not, per Mr. Tarpo, received hazardous waste. Because this facility is being evaluated under CERCLIS as a potential Super fund site, I believe further investigation of the constituents of this pond should be conducted under these program areas.

GROUNDWATER MONITORING

40 CFR Subpart F

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

	YES	NO	NI
1) Has the owner or operator of the facility implemented a groundwater monitoring system? 40 CFR 265.90(a) (320 IAC 4.1-20-1)			✓
2) Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in 265.90(d) (320 IAC 4.1-20-1)?			✓

APPENDIX GN

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Manifest Requirements:	YES	NO	NI
1) Does the operator have copies of the manifest available for review? 40 CFR 262.40 (320 IAC 4.1-10-1)	✓		
2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period		3	
3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record infomation from, manifest(s) that do not contain the critical elements). 40 CFR 262.21 (320 IAC 4.1-8-1)			
a. Manifest document number? (A sequential number for all manifests before September 20, 1984 and a five digit unique number after September 20, 1984.)		✓ ①	
b. Name, mailing address, telephone number, and EPA ID number of generator?	✓		
c. Name, telephone number (4.1-14-3) and EPA ID Number of Transporter(s)?	✓		
d. Name, Address, telephone number (4.1-14-3) and EPA ID Number of designated permitted facility?	✓		
e. The description of the waste(s)(DOT shipping name, DOT hazard class, DOT identification number)?	✓		
f. The total quantity of waste(s) and the type and number of containers loaded?	✓		
g. Required certification?	✓		
h. Required signatures?	✓		
i. EPA hazardous waste number (4.1-14-3)?		✓	②

① They did not use a unique manifest document number on manifests 034127 and 034145 ~~Copies are needed~~

② The facility has been shipping F003/F005 derived hazardous waste with a manifest that indicates it is D001 (see manifest number AR 93060)

	YES	NO	NI
4) Reportable exceptions: 40 CFR 262.42 (320 IAC 4.1-10-3)			
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. 0			
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) (320 IAC 4.1-10-3) to the Regional Administrator.			
5) If required, are placards available to transporters of hazardous waste? 40 CFR 262.33 (320 IAC 4.1-9-4)	✓		

INTERNATIONAL SHIPMENTS:

1) Has the installation imported or exported hazardous waste? 40 CFR 262.50 (320 IAC 4.1-11-1) (If answered Yes, complete the following as applicable.)		✓	
a. Exzporting hazardous waste; has a generator:			
i. Notified the administrator in writing?			
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?			
iii. Met the Manifest requirements?			
b. Importing hazardous waste; has the generator met the manifest requirements?			

PRE-TRANSPORT REQUIREMENTS:

	YES	NO	NI
1) Is waste packaged in accordance with DOT regulations? (required prior to movement of hazardous waste off-site) 40 CFR 262.30 (320 IAC 4.1-9-1)	___	___	✓
2) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 40 CFR 262.31-261.32 (320 IAC 4.1-9-2 & 3)	___	___	✓

3) On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b) (320 IAC 4.1-15-1)] or (B) in accordance with 40 CFR 262.34 (320 IAC 4.1-9-5) [see 265.1(c)(7) (320 IAC 4.1-15-1)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this blank ✓ and skip to RECORDKEEPING AND REPORTING. If the installation elects option B, complete the following observations:

	YES	NO	NI
a. Is the container clearly marked with the start of accumulation date? 40 CFR 262.34 (320 IAC 4.1-9-5)	___	___	___
b. Are all containers visible for inspection? 40 CFR 262.34(a)(2) (320 IAC 4.1-9-5)	___	___	___
c. Have more than 90 days elapsed since the date inspected in (a)? 40 CFR 262.34 (320 IAC 4.1-9-5)	___	___	___
d. Do wastes remain in accumulation tanks for more than 90 days? 40 CFR 262.34 (320 IAC 4.1-9-5)	___	___	___
e. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"? 40 CFR 262.34 (320 IAC 4.1-9-5)	___	___	___

	YES	NO	NI
RECORDKEEPING AND REPORTING:			
1) Has the generator made a proper hazardous waste determination for all solid wastes generated at the facility? 40 CFR 262.11 (320 IAC 4.1-7-2)		✓ (1)	
2) Have all all test results and analyses needed for hazardous waste determination been done? Are they retained on-site for at least three years? 40 CFR 262.11 (4.1-7-2) & 40 CFR 262.40 (4.1-7-2)		✓ (2)	
3) Has the generator submitted biennial reports and exception reports as required? 320 IAC 4.1-10-2 and 320 IAC 4.1-10-3	✓		
4) Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 40 CFR 262.40 (320 IAC 4.1-10-1)		N/A	

(1) The facility has not made a proper hazardous waste determination for the hazardous waste derived fuel it ships with a manifest indicating it is D001, when, in fact, the waste is derived from F003/F005 spent solvent waste

(2) All of the hazardous waste managed at this facility is either listed or ignitable hazardous waste. There is no reason I can find to suspect that the condensate water is a hazardous waste because it is a non contact coolant.

APPENDIX TR

SCOPE:	YES	NO	NI
1) Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10 (320 IAC 4.1-10-1)			
2) Does the transporter transport hazardous waste into the U.S. from abroad?			
3) Does the transporter transport hazardous waste out from the U.S.?			
4) Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?			
MANIFEST SYSTEM AND RECORDKEEPING:			
1) Are copies of completed manifests available for review and retained for three years? 40 CFR 263.22 (320 IAC 4.1-13-3)			
2) Estimate the number of manifests for shipments completed during the past 6 months.			
3) Examine a representative number of manifests. Indicate number examined.			
4) Did the transporter properly sign and date the manifests examined? 40 CFR 263.20 (320 IAC 4.1-13-1)			
5) Do any manifests indicate shipments delivered to other than the designated facility?			
(If (5) is "NO", skip 6 and 7.)			
6) Do any manifests indicate shipments delivered to other than an alternate facility?			
7) Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility? 40 CFR 263.21 (320 IAC 4.1-13-2)			

DRAW A SITE MAP; identify site of all hazardous waste activity, i.e. accumulation areas, storage areas, treatment areas, etc.

Remember to take photos and document as well as possible all violations!!!

Notice of Deficiency
Second Technical Review/Part B
American Chemical Service, Inc.
Griffith, Indiana
IND 016360265

B-2 Topographical Map: 320 IAC 4.1-34-5(b)

Provide a wind rose of the facility.

Provide a plan of the entire facility which indicates the position of each RCRA tank and the piping and process flow between all hazardous waste processing and/or storage locations. Include the storage pit for spills from the solvent recovery operation and describe how material enters/leaves this location. Also, include the former solids mixing area and detail methods used to close this area, i.e., the closure plan.

Explain the discrepancy between the tank storage data in the original Part B and the revision regarding the injectant tank farm. Tanks 202, 205, and 206 of the revision have either different numbers or dimensions in the original Part B application.

C-1 Chemical and Physical Analyses: 320 IAC 4.1-34-5(b)(2) and 41-4(a)

This section is technically inadequate. Each waste stored, treated, or disposed of must be described and identified for hazardous characteristics and represented by proper examples of laboratory analyses. The laboratory results should also reflect a proper QA/QC program which does not appear here.

C-1a Containerized Wastes: 320 IAC 4.1-34-6(b)(1)

Describe the secondary containment system for containerized wastes. This item is technically inadequate without it.

C-1b Waste in Tanks: 320 IAC 4.1-49-2(a)

Provide the maximum specific gravity of wastes for each tank.

C-2b Test Methods: 320 IAC 4.1-41-4(b)(2)

This item is technically incorrect inasmuch as test T8 and T9 both refer to being "similar to #8010, 8020 (SW-946)" which is for GC analysis of organics. T8 is referred to as "pH" testing not organics. Please clarify this apparent discrepancy.

C-2c Sampling Methods: 320 IAC 4.1-41-4(b)(3) and 6-5, Appendix I

This item is technically inadequate since the sampling methods include a caveat to forego sampling if "the samples appear physically similar in viscosity, odor, and color to previous shipments . . . ." Visual inspection of waste material is not an acceptable method of testing. Please revise.

C-2e Additional Requirements for Wastes Generated Off-site: 320 IAC 4.1-41-4(c)

This item is technically inadequate. Please describe the procedures used to analyze wastes received from off-site, including procedures to identify wastes and sampling methods used. As noted earlier, visual inspection will not be technically adequate here.

C-2f Additional Requirements for Ignitable, Reactive, or Incompatible Wastes: 320 IAC 4.1-41-4(b) and 41-8

This item is technically inadequate. Please describe the methods used to analyze properly for ignitability and reactivity (cyanides and sulfides) in wastes to be treated, stored, or disposed of.

D-1a(1) Description of Containers: 320 IAC 4.1-41-8-2 and 48-3

Please describe dimensions, materials of construction, and compatibility of waste with containers (drums). No description or specifics were found for this item, making it technically inadequate.

D-1a(2) Container Management Practices: 320 IAC 4.1-48-4

The layout of the container storage area does not specify the location of the different waste types as per comment B3 of the May 19, 1985, EPA Notice of Deficiency (hereafter referred to as the NOD).

D-1a(3)(a) Requirement of the Base or Liner to Contain Liquids: 320 IAC 4.1-34-6(a)(1)

Describe the construction materials and dimensions of the sump.

D-1a(3)(c) Containment System Capacity: 320 IAC 4.1-34-(a)(3), 320 IAC 4.1-48-6(b)(3)

Determine the maximum depth of liquid if the containment system contains ten percent of the total volume of the containers. Consider any displacement due to containers or equipment.

D-1a(4) Removal of Liquids from Containment Systems:
320 IAC 4.1-34-6(a)(5), 320 IAC 4.1-48-6(b)(5)

The revision states that the sump will not be emptied until it is approximately 75 percent full. This would result in what amounts to an open container holding more waste than one of the drums. To alleviate a potential health hazard from fumes and possible ignitable wastes, a lower volume is to be proposed.

The sump must be inspected on a daily basis. The Part B application must reflect this.

D-1b(1) Test for Free Liquids: 320 IAC 4.1-34-6(b)(1)

Please state whether or not facility receives wastes that do not contain free liquids. If they do, then document test procedures for free liquids. This item is unclear and assumed to be technically inadequate.

D-1b(2) Description of Containers: 320 IAC 4.1-48-2 and 48-3

As in D-1a(1), please give container (drum) specifics if D-1b(1) (storage of wastes free of free liquids) is true. This item is related to response of D-1b(1) and is also unclear and assumed to be technically inadequate.

D-1b(4) Container Storage Area Drainage: 320 IAC 4.1-34-6(a)(2), 4.1-48-6(b)(2)

The inspection of February 18, 1986, by staff of the Division of Land Pollution Control revealed that the floor of the container storage area does not sufficiently drain liquids to the central sump. Demonstrate how the floor can be changed to promote drainage or how the containers will be managed to prevent contact with standing liquids.

D-2a Description of Tanks: 320 IAC 4.1-34-7, 320 IAC 4.1-49-2

Provide the following details regarding the blending tank and straining bin at the southwest corner of the drum storage area: dimensions, design capacity, age, construction materials, shell thickness, how shell thickness was determined (see below), previous use, filling/emptying procedures, overfill prevention measures, and foundation materials.

Provide the following information about the remaining storage tanks: age, original thickness, steel grade, and previous use. Also, describe how the shell thicknesses were determined, i.e., number and locations of measured points, and how the final reported results were calculated.

D-2b Tank Corrosion and Erosion: 320 IAC 4.1-34-7, 320 IAC 4.1-49-3(a)

Maximum shell thicknesses as per comment C6 of the NOD were not provided. Instead, a maximum specific gravity of waste per tank per year was established. The object of the tank corrosion data is to provide a minimum tank shell thickness that may be reached before replacement. The specific gravity used in this calculation is to be based on the maximum specific gravity of waste to be reasonably expected, not back calculated from the original thickness. Specific calculations may have to be provided for each tank based on such factors as size, past use, construction material, and use of agitators.

Sheet No. 30 of the Tank Storage section of the response states that API 650 A4.1 was used as a standard in the shell thickness calculations. However, API 650 A4.2 limits the minimum tank shell thickness of such tanks to 0.1875 inches. As some tank shells are now thinner than this standard permits, they would have to be replaced or a demonstration provided that the tanks will support the waste and will not suffer from normal operational procedures.

D-2c Tank Management Practices: 320 IAC 4.1-34-7(d) and (e), 320 IAC 4.1-49-3(b)

Provide the venting capacities of the breather valves. The statement on page TS-3 that the valves are sized to provide emergency venting is not sufficient. Provide the calculations and data to support this statement.

Provide the operating temperature ranges of tank venting and overfill prevention equipment.

Provide the location of the signal control panel shown on Sheet No. 31 of the Tank Storage section of the revision to the Part B application.

F-2a General Inspection Requirements: 320 IAC 4.1-34-5(b)(5); 41-6(a) and (b); 42-4

Describe the facility schedule for inspection of monitoring equipment, safety and emergency equipment, security devices, and operating and structual equipment that are vital to prevent, detect, or respond to environmental or human health hazards. The schedule must be kept at the facility.

F-2a(1) Types of Problems: 320 IAC 4.1-41-6(b)(3)

The schedule must identify the types of problems to look for during the inspection.

F-2a(2) Frequency of Inspections: 320 IAC 4.1-41-6(b)(4)

Describe the frequency of inspection for items on the schedule. The frequency of inspection should be based on the rate of possible deterioration of equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or operator error goes undetected between inspections. Areas subject to spills, such as loading and unloading areas, must be inspected daily when in use.

F-2b(2)(d) Tank Monitoring Data: 320 IAC 4.1-49-4(a)(2)

Data gathered from tank monitoring devices (e.g., pressure and temperature gauges) must be inspected daily to ensure that the tank is operating according to design specifications.

F-2b(2)(f) Tank Condition Assessment: 320 IAC 4.1-49-4(b)

Provide the schedule and procedure for determining the condition of each tank. The procedure must be adequate to detect cracks, leaks, or wall thinning to less than the sufficient shell thickness. If original shell thicknesses or past uses are unknown, an inspection schedule more frequent than annually may be necessary to determine the rate of corrosion.

F-2b(2)(g) Tank Inspection: 320 IAC 4.1-49-4(b)

Document established procedures for emptying tanks to allow entry and interior inspection to detect corrosion or erosion of tank sides and bottoms.

F-3a(4) Water for Fire Control: 320 IAC 4.1-42-3(d)

Water at adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers, or water spray systems. What are the volumes and pressures of all these systems?

F-3b Aisle Space Requirement: 320 IAC 4.1-42-3(d)

Demonstrate that the facility maintains sufficient aisle space to allow the unobstructed movement of personnel, fire protection equipment, or spill control equipment to any area of facility operation in an emergency. Requests for a waiver of the aisle space requirement must be accompanied by a demonstration that aisle space is not needed for any or all of these purposes.

F-4 Preventive Procedures, Structures, and Equipment: 320 IAC 4.1-34-5(b)(8)

Provide a description of how spills and/or other contaminated runoff from all loading/unloading areas and from blending (thinning) operations at the southwest corner of the container storage area are prevented from leaving these locations.

F-4c Water Supplies: 320 IAC 4.1-34-5(b)(8)(iii)

Address prevention of contamination of water supplies.

F-4d Equipment and Power Failure: 320 IAC 4.1-34-5(b)(8)(iv)

Address the mitigation of effects of equipment failure and power outage.

F-4e Personnel Protection Equipment: 320 IAC 4.1-34-5(b)(8)(v)

This item is technically inadequate because it is not provided. Please describe procedures to prevent undue exposure of personnel to hazardous wastes (hard hats, safety glasses, gloves, protective clothing, respirators, etc.).

F-5a Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Wastes: 320 IAC 4.1-5-4(a)

This item is inadequate because the definition of reactive wastes refers to wastes capable of reacting and releasing hydrogen sulfide or hydrogen cyanide gas. The testing necessary to disprove reactivity is not addressed by the facility.

F-5b General Precautions for Handling Ignitable or Reactive Waste and Mixing of Incompatible Wastes: 320 IAC 4.1-34-5(b)(9) and 41-8(b)

This item is inadequate because the precautions are not provided. Please describe the precautions taken by the facility to prevent reactions that: (1) generate extreme heat or pressure, fire or explosions, or violent reactions; (2) produce uncontrolled flammable fumes, dusts, or gases; (3) produce uncontrolled flammable fumes, or gases in quantities to pose a risk of fire or explosions; (4) damage the structual integrity of the device or facility; (5) by similar means threaten human health or the environment.

F-5c Management of Ignitable or Reactive Wastes in Containers: 320 IAC 4.1-34-6(c) and 48-7

This item is technically inadequate since it is not provided. Please provide sketches, drawings, or data to demonstrate containers of identified ignitable or reactive wastes are at least 50 feet from the property line.

F-5d Management of Incompatible Wastes in Containers: 320 IAC 4.1-34-6-(d) and 48-8

This item is technically inadequate because of the lack of description for identifying incompatible wastes. Please give exact procedures to ensure that incompatible wastes are not stored in the same container or that an unwashed container with incompatible waste is used. If incompatible wastes are stored in nearby tanks or containers, document that the wastes are separated by a dike or wall.

F-5e Management of Ignitable or Reactive Wastes in Tanks: 320 IAC 4.1-49-6 and 34-7(f)

This item is unclear and therefore assumed to be technically inadequate. Please describe the operational procedures used for storing such wastes in tanks that includes specific information on: (1) how the waste is treated, rendered or mixed before or immediately after the placement in the tank so that it is no longer considered ignitable and complies with 264.17(b), or the waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to react or ignite, or the tank is used solely for emergencies; (2) how facilities that treat and store ignitable or reactive wastes in covered tanks comply with the National Fire Prevention Association's buffer zone requirement for tanks.

F-5f Management of Incompatible Wastes in Tanks: 320 IAC 4.1-34-7(f) and 49-7(b)

This item is inadequate because no reference is made to management of incompatible wastes in tanks. Please state whether or not such wastes are stored in this manner and if so, how they are managed.

G-3 Implementation: 320 IAC 4.1-43-3(a), 320 IAC 4.1-43-7(d)

Define the term "containment area."

Define the term "major spill."

G-4b Identification of Hazardous Wastes: 320 IAC 4.1-43-7(b)

This item is inadequate since no definition of major spill is given and no clarification is given for identifying hazardous wastes. Describe how to determine wastes as hazardous.

G-4f Spill Control Plan-Storage and Treatment of Released Materials: 320 IAC 4.1-43-7(g)

Provide an updated facility plan which indicates the run-off system and holding ponds currently in use and how this system is designed to prevent further releases.

I-1a Closure Performance Standard: 320 IAC 4.1-46-2(a) and (b)

Describe how closure minimizes the need for post-closure maintenance and minimizes releases of wastes.

J. OTHER FEDERAL LAWS: 320 IAC 4.1-33-3

Demonstrate compliance with the requirements of applicable Federal laws such as the Wild and Scenic Rivers Act, National Historic Preservation Act of 1966, Endangered Species Act, Coastal Zone Management Act, and Fish and Wildlife Coordination Act.

K. PART B CERTIFICATION: 320 IAC 4.1-34-2(a) and (b)

Applications must be accompanied by a certification letter as specificed in 270.11(d). The required signatures are as follows: (1) for a corporation, a prinicpal executive officer (at least at the level of vice-president); (2) for a partnership or sole proprietorship, a general partner or the proprietor, respectively; (3) for a municipal, state, federal, or other agency, either a principal executive officer or ranking elected official.

1B1

TSD RCRA Inspection Report

EPA Identification Number: I N D 0 1 6 3 6 0 2 6 5

Installation Name: American Chemical Services

Location Address: P.O. Box 190 (Colfax Ave.)

City: Griffith ZIP 46319

Date of Inspection: 10/22/84 Time of Inspection 9:00 A

Person(s) interviewed	Title	Telephone
Mr. James Tarpo	President	219/924-4370
Ray Murphy	Chemist	

Inspector(s)	Agency	Telephone
Ted Warner	ISBH	633/243/5111

Installation Processes by Process Code (EPA Form 3510-3)

- S01 X Container (barrel, drum, etc.)
- S02 X Tanks
- S04 ___ Surface impoundment
- D84 ___ Surface impoundment closed as a landfill
- S03 ___ Waste Pile
- D81 ___ Landfill
- D80 ___ Underground injection

Has fire pond which has drains from container process area.

If Part A process codes are not listed above please check 40 CFR 265 Appendix I, Table 2 for correct code number. List codes below.

Other activities

Generator ___ Appendix GN

Transporter ___ Appendix TR

1. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

2. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

General Facility Standards (paperwork)

	YES	NO	NI
1) Has the Regional Administrator/Environmental Management Board been notified regarding:			
a. Receipt of hazardous waste from a foreign source? 40 CFR 265.12(a)		X	
b. Facility expansion? 40 CFR 122.23(c)		X	
c. Change of owner or operator? 40 CFR 265.12(b)		X	

OK

2) General Waste Analysis:

a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste? 40 CFR 265.13(a)1	X		
b. Does the owner or operator have a detailed waste analysis plan on file at the facility? 40 CFR 265.13(b)	X		

Does the waste analysis plan contain:

1. parameters
2. test methods
3. sampling method for representative sample
4. frequency of analysis
5. for off-site facilities: waste analysis from generators
6. Where applicable (additional waste analysis needed)
   a. 265.193 When chemically or treating different waste or using a different process or storing waste in different type of containers.
   b. 265.225 Surface impoundment (same as above)
   c. 265.252 Waste Pile (same as above)
   d. 265.273 Land Treatment Facility (same as above)
   e. 265.341 Incinerators (same as above)
   f. 265.375 Thermal Treatment (same as above)
   g. 265.402 Chemical, Physical, Biological Treatment (same as above)

Barrett - 4 straight to fuel

OK

	YES	NO	NI
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? 40 CFR 265.13(c)	X		

OK

3) Owner or Operator Inspections:

a. Does the owner or operator inspect the facility for deterioration, malfunctions, operator errors, and discharges of hazardous waste that may affect human health or the environment? 40 CFR 265.15(a)	X		
b. Does the owner or operator have an inspection schedule at the facility? 40 CFR 265.15(b)2	X		
c. If storage in tanks or containers is used does the inspection schedule require a weekly inspection? 40 CFR 265.194 tanks, 265.174 containers, 265.226(a)2 impoundments	X		

OK

	YES	NO	NI
d. If so, does the schedule address the inspection of the following items: 40 CFR 265.15(b)1			
i. monitoring equipment?	X		
ii. safety and emergency equipment?	X		
iii. security devices (including fences)?		X	
iv. operating and structural equipment (ie. dikes, pumps, etc.)?	X		
v. type of problems to be looked for during the inspection (e.g. leaky fittings, defective pump, etc.)? 40 CFR 265.15(b)(2)	X		
vi. inspection frequency (based upon the possible deterioration rate of the equipment)? 40 CFR 265.15(b)(4)	X		
vii. Must include:			
1. Weekly container storage? 265.174	X		
2. Daily and Weekly Tank Storage? 265.194	X		
3. Daily freeboard and weekly dike inspection for surface impoundments? 265.226			X
4. Landfills, Thermal treatment, Chemical, Physical, and Biological treatment should be inspected as determined by deterioration rate and daily at loading and unloading areas (where spills are likely) 265.15(b)(4)			X
e. Are areas subject to spills inspected daily when in use? 265.15(b)(4)	X		

Security devices are not included in the inspection schedule.

	YES	NO	NI
f. Does the owner or operator maintain an inspection log or summary of owner or operator inspections? 40 CFR 265.15(d)	X		
g. Does the inspection log contain the following information: 40 CFR 265.15(d)			
i. the date and time of the inspection?	X		
ii. the name ot the inspector?	X		
iii. a notation of the observations made?	X		
iv. the date and nature of any repairs or remedial actions?	X		

ok

4) Do personnel training records include:

	YES	NO	NI
a. Are all facility personnel included in the records? 40 CFR 265.16(a)(1)	X		
b. Job titles? 40 CFR 265.16(d)1	X		
c. Job descriptions? 40 CFR 265.16(d)2	X		
d. Description of training? 40 CFR 264.16(d)3	X		
e. Records of training? 40 CFR 265.16(d)4	X		
f. Did facility pesonnel receive the required training including:			
i) classroom or on the job	X		
ii) within 6 months of hire	X		
iii) annual review of training?	X		

ok

Preparedness and Prevention

	YES	NO	NI
1) Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility? 40 CFR 265.37	X		

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

	YES	NO	NI
1) Does the Contingency Plan contain the following information:			
a. The actions facility personnel must take to comply with 265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable).	X		
b. Arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to 265.37?	X		
c. Names, addresses, and phone numbers of all persons qualified to act as emergency coordinators?	X		
2) Emergency Coordinator:			
a. Is the facility Emergency Coordinator identified? 40 CFR 265.52(d)	X		
b. Is coordinator familiar with all aspects of site operation and emergency procedures? 40 CFR 265.55	X		
c. Does Emergency Coordinator have the authority to carry out the Contingency Plan? 40 CFR 265.55	X		
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? 40 CFR 265.52(e)	X		
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must decribe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.) 40 CFR 265.52(f)	X		

OK

	YES	NO	NI
3) Are copies of the Contingency Plan available at the site and local emergency organizations? 40 CFR 265.53	X		

OK

4) Emergency Procedures

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?			X

MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING:

1) Use of Manifest System:

a. Does the facility follow the procedures listed in 265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	X		
b. Are records of past shipments retained for 3 years? 40 CFR 265.71(b)5	X		
2) Does the owner or operator meet requirements regarding manifest discrepancies? (Off-site facilities only) 40 CFR 265.73(a)	X		

OK

	YES	NO	NI
3) Operating Record:			
a. Does the owner or operator maintain an operating record as required in 265.73?	X		
b. Does the operating record contain the following information:			
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR 265 Appendix I? 40 CFR 265.73(b)(1)	X		
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross referenced to specific manifest number if the waste was accompanied by manifest.) 40 CFR 265.73(b)(2)	X		
iii. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross referenced to specific manifest number, if accompanied by a manifest.) 40 CFR 265.73(b)(2)			X
iv. Records and results of all waste analyses, trial tests, monitoring data, and operating inspections? 40 CFR 265.73(b)(3)(5)(6)	X		
v. Reports detailing all incidents that required implementation of the Contingency Plan? 40 CFR 265.73(b)(4)			X
vi. All closure and post closure costs as applicable? 40 CFR 265.73(b)(7)	X		

Closure Cost estimate $139,024.92

	YES	NO	NI
4) Availability of Records:			
Are all facility records required under 40 CFR 265 available for inspection? 40 CFR 265.74	X		
5) Unmanifested Waste Reports: (applies only to Off-site facilities)			
a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or shipping paper? 40 CFR 265.76			X
b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type and date received for each unmanifested hazardous waste shipment.			
c. Has the facility submitte 8700-13B (unmanifested waste report)?			X

OK

6) Closure/Post-Closure:			
a. Is the closure plan available for inspection? 40 CFR 265.112(a)	X		
b. Is the post-closure plan available for inspection? (for disposal facilities only) 40 CFR 265.118(a)			X

OK

PHYSICAL FACILITY INSPECTION

1) Security - Do security measures include:
(If applicable)

See 40 CFR 265.14 for the following

	YES	NO	NI
a. 24- hour surveillance?			
or			
b. i. Artificial or natural barrier around facility?	X		
and			
ii. Controlled entry?	X		
c. Danger sign(s) at entrance?	X		

OK

Preparedness and Prevention:

Part 265 Subpart C

1) Maintenace and Operation of Facility

	YES	NO	NI
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 40 CFR 265.31	X		

2) If required, does the facility have the following equipment:

	YES	NO	NI
a. Internal communications or alarm systems? 40 CFR 265.34(a) & 40 CFR 265.32(a)	X		
b. Telephone or 2-way radios at the scene of operations? 40 CFR 265.32(b) & 40 CFR 265.34(b)	X		
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? 40 CFR 265.32(c)	X		

Indicate the volume of water and/or foam available for fire control:

fire pond - 50,000 for reclaimed area
+ deep wells

	YES	NO	NI
3) Testing and Maintenace of Emergency Equipment:			
a. Has the owner or operator established testing and maintenace procedures for emergency equipment? 40 CFR 265.33	X		
b. Is emergency equipment maintained in operable condition? 40 CFR 265.33	X		
4) Has owner or operator provided immediate access to internal alarms? (If needed) 40 CFR 265.34(a)	X		
5) Does the owner or operator maintain adequate aisle space for movement of personnel, fire protection equipment, spill control equipment, and decontamination equpment? (This applies to access for this equipment to reach hazardous waste management areas) 40 CFR 265.35	X		

Hoosier fire G. + pump
phone dial (7) - sets off alarm

Use and Management of Containers

40 CFR 265 Subpart I

		YES	NO	NI
1)	Are containers in good condition? 40 CFR 265.170	X		
2)	Are containers compatible with waste in them? 40 CFR 265.172	X		
3)	Are containers managed to prevent leaks? 40 CFR 265.173(b)	X		
4)	Are containers stored closed? 40 CFR 265.173(d)	X		
5)	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). 40 CFR 265.176	X		
6)	Are incompatable wastes stored in separate containers? (If not the provisions of 265.17(b) apply) 40 CFR 265.177(a)			X
7)	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? 40 CFR 265.177(c)			X
8)	If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 40 CFR 265.17(a)			
	a. Special handling?	X		
	b. No Smoking signs?	X		
	c. Separation and protection from ignition sources?	X		
9)	Is there adequate aisle space for unobstructed movement? 40 CFR 265.35	X		

Drum inventory is very low (only 60 containers)

Tanks

40 CFR 265 Subpart J

	YES	NO	NI
1) Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 40 CFR 265.192(b)	X		
2) Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures? 40 CFR 265.192(c)			X
3) Do continuous feed systems have a waste-feed cut-off? 40 CFR 265.192(d)			X
4) Are reactive & ignitable wastes in tanks protected or rendered nonreactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 40 CFR 265.198			X

5) Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes? 40 CFR 265.198(b) OK over 10%

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line over 50 ft. feet

(See table 2-1 through 2-6 of NFPA's "Flammable and Combustable Liquids Code -1977" to determine compliance.)

6) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 40 CFR 265.17(a)

	YES	NO	NI
a. Special handling?	X		
b. No Smoking signs?	X		
c. Separation and protection from ignition sources?	X		

OK

APPENDIX GN

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Manifest Requirements:	YES	NO	NI
1) Does the operator have copies of the manifest available for review? 40 CFR 262.40	___	___	N/A
2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period		___	
3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record infomation from, manifest(s) that do not contain the critical elements). 40 CFR 262.21			
a. Manifest document number?	___	___	___
b. Name, mailing address, telephone number, and EPA ID number of generator?	___	___	___
c. Name and EPA ID Number of Transporter(s)?	___	___	___
d. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	___	___	___
e. The description of the waste(s)(DOT shipping name, DOT hazard class, DOT identification number)?	___	___	___
f. The total quantity of waste(s) and the type and number of containers loaded?	___	___	___
g. Required certification?	___	___	___
h. Required signatures?	___	___	___

_____

_____

_____

	YES	NO	NI
4) Reportable exceptions: 40 CFR 262.42			
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. _____			
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. _____			
5) If required, are placards available to transporters of hazardous waste? 40 CFR 262.33	___	___	___

INTERNATIONAL SHIPMENTS:

1) Has the installation imported or exported hazardous waste? 40 CFR 262.50 (If answered Yes, complete the following as applicable.)	___	___	___
a. Exzporting hazardous waste; has a generator:			
i. Notified the administrator in writing?	___	___	___
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	___	___	___
iii. Met the Manifest requirements?	___	___	___
b. Importing hazardous waste; has the generator met the manifest requirements?	___	___	___

PRE-TRANSPORT REQUIREMENTS:

	YES	NO	NI
1) Is waste packaged in accordance with DOT regulations? (required prior to movement of hazardous waste off-site) 40 CFR 262.30	___	___	N/A
2) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 40 CFR 262.31-261..32	___	___	___

3) On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this blank ____ and skip to RECORDKEEPING AND REPORTING. If the installation elects option B, complete the following observations:

	YES	NO	NI
a. Is the container clearly marked with the start of accumulation date? 40 CFR 262.34	___	___	___
b. Are all containers visible for inspection? 40 CFR 262.34(a)(2)	___	___	___
c. Have more than 90 days elapsed since the date inspected in (a)? 40 CFR 262.34	___	___	___
d. Do wastes remain in accumulation tanks for more than 90 days? 40 CFR 262.34	___	___	___
e. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"? 40 CFR 262.34	___	___	___
f. Is waste packaged in accordance with DOT regulations? 320 IAC 4-4-1	___	___	___

	YES	NO	NI
g. Are waste packages marked in accordance with applicable DOT regulations on hazardous materials under 49 CFR Part 172? 320 IAC 4-4-1	___	___	N/A
h. Are waste packages labeled in accordance with applicable DOT regulations on hazardous materials under 49 CFR Part 172? 320 IAC4-4-1	___	___	___

RECORDKEEPING AND REPORTING:

1) Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 40 CFR 262.40	___	___	___

APPENDIX TR

	YES	NO	NI
SCOPE:			
1) Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263..10	___	___	N/A
2) Does the transporter transport hazardous waste into the U.S. from abroad?	___	___	___
3) Does the transporter transport hazardous waste out from the U.S.?	___	___	___
4) Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	___	___	___
MANIFEST SYSTEM AND RECORDKEEPING:			
1) Are copies of completed manifests available for review and retained for three years? 40 CFR 263.22	___	___	___
2) Estimate the number of manifests for shipments completed during the past 6 months.	_____		
3) Examine a representative number of manifests. Indicate number examined.	_____		
4) Did the transporter proerly sign and date the manifests examined? 40 CFR 263.20	___	___	___
5) Do any manifests indicate shipments delivered to other than the designated facility?	___	___	___
(If (5) is "NO", skip 6 and 7.)			
6) Do any manifests indicate shipments delivered to other than an alternate facility?	___	___	___
7) Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility? 40 CFR 263.21	___	___	___

_____

_____

_____

Briefly Describe Site Activity

American Chemical Services recovers spent solvents by solvent distillation. The company also mixes flammables to produce a secondary fuel for industrial use.

What is the status of the facility, if different from original notification, explain! (copy all pertinent documents)

10% Bond - Jeff Stevens letter discussed
Mr. Tarpo will provide needed information.

V. Open Burning

Only complete this part if the facility open burns hazardous waste.

	Yes	No	Not Inspected	See Remark #:
1. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned.)	____	____	____	____
2. If this facility open-burns waste explosive, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)?	____	____	____	____

Inspector(s): Richard A. Shandross 12/15/80 (Sign and Date)

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1.250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,001 to 30,000.....	690 m	2,260 ft

11/6/80

2. Documented, written data may be substituted for analysis for these. Are either present for:

	Yes	No	Not Inspected	See Remark #:
a. Lead?		✓		
b. Mercury?		✓		

B. Other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested for.)

	See Remark #:
1.	
2.	
3.	
4.	
5.	

IV. Monitoring and Inspections

	Yes	No	Not Insp.	See Remark #:
A. Combustion/emission control instruments monitored at least every 15 minutes?			NA	
B. Steady state maintained or corrections attempted?			NA	
C. Stack plume observed at least hourly for normal color and opacity?			NA	
D. Did any stack observations made by owner or operator show a plume different than normal?*			NA	
E. If yes to D above, were corrections made to return emissions to normal appearance?*			NA	
F. Complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	✓			
G. Emergency shutdown controls, system alarms checked daily for proper operation?			NA	

* cify in Remarks for what period of time this was checked.

11/6/80

IND016360265
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 1 - General Facility Standards

I. General Information:

(A) Facility Name: American Chemical Service Inc.

(B) Street: 420 S. Colfax Ave

(C) City: Griffith (D) State: IN (E) Zip Code: 46319

(F) Phone: (219) 924-4370 (G) County: Lake

(H) Operator: James Tarpo

(I) Street: See above

(J) City: (K) State: (L) Zip Code:

(M) Phone: (N) County:

(O) Owner: James Tarpo

(P) Street: see above

(Q) City: (R) State: (S) Zip Code:

(T) Phone: (U) County:

(V) Type of Ownership: ___ Federal ___ Municipal ✓ Private ___ State ___ County

(W) Date of Inspection: 12/4/80 (Q) Time of Inspection (From) 3 pm (To) 5:30 pm
12/8/80 10am to 4:30pm

(X) Weather-Conditions: 12/4 ~40°F. Fair
12/8 ~45°F. Rain

(Y) Person(s) Interviewed	Title	Telephone
James Tarpo	President	(219) 924-4370
Jim Murphy	Plant manager	(219) 924-4370

(Z) Inspection Participants	Title	Telephone
Richard Shardross	Environmental Engineer	(312)886-6146

II. Description of Site Activity

(A) ____ Generator (Form 2)

(B) ____ Transporter (Form 3)

(C) ✓ Chemical, Physical and Biological Treatment (Form 4)

(D) ✓ Storage (Form 5)

(E) E Landfill (Form 6)

(F) ____ Incineration (Form 7)

(G) ____ Land Treatment (Form 4)

(H) ✓ Thermal Treatment (Form 7)

(I) Comments: (C) & (H) apply to ~~set~~ reclaiming of wastes, but put in Part A.

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

	Yes	No	Not Inspected	See Remark Number
(J) Has this facility Submitted a Part A Permit Application?	✓			

IND016360265
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
SUPPLEMENTAL FORM 5 FOR STORAGE FACILITY INSPECTIONS

I. General Information

(A) Facility Name: American Chemical Service

(B) Street: 420 S. Colfax Ave

(C) City: Griffith (D) State: In (E) ZIP Code 46319

(F) Date of Inspection: 12/4/80

II. Storage Facility Standards (Part 265)

A. Facilities which store containers of hazardous waste (Subpart I)

	YES	NO	NOT INSPECTED	REMARK #
1. Are containers in good condition?	✓			
2. Are containers compatible with waste in them?	✓			
3. Are containers stored closed?	✓			
4. Are containers managed to prevent leaks?	✓			
5. Are containers inspected weekly for leaks and defects?	✓			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line?	✓			
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)			NA	
8. Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance?			NA	

B. Facilities which store hazardous waste in tanks (Subpart J)

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	✓			
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?			NA	

Continued on next page

	YES	NO	NOT IN-SPECTED	REMARK #
3. Do continuous feed systems have a waste-feed cutoff?			NA	
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?			NA	
5. Are required daily and weekly inspections done?	✓			
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)			NA	
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)			NA	
C. Facilities which store hazardous waste in surface impoundments (Subpart K)				
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?				
2. Do earthen dikes have protective cover?				
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?				
4. Is the freeboard level inspected at least daily?				
5. Are the dikes inspected weekly for evidence of leaks or deterioration?				
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)				
D. Facilities which store hazardous waste in waste piles (Subpart L)				
1. Are waste piles covered or protected from the wind?				
2. Is each in-coming movement of waste analyzed before being added to the waste pile?				
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981.)				
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				

Continued on next page