RCRA HAZARDOUS WASTE FACILITY
COMPLIANCE EVALUATION INSPECTION CHECKLIST

Facility: MASTER METALS

USEPA I.D.: OHD 097 613 871 HWFB No.: _____

Street: 2850 WEST THIRD STREET

City: CLEVELAND State: OHIO Zip: 44113

County: CUYAHOGA Telphone: (216) 621-2361

Fax No: _____ PUCO No.: _____

Owner/Operator: SAME AS ABOVE

Street: _____

City: _____ State: _____ Zip: _____

Telephone: _____ Fax: _____

Inspection Date: 9/15,21,30/93 Time: 10^00 - 1^00

Advance notice of inspection given? (yes) ✓ (no) ____
If so, how far in advance? 1 week

	Name	Agency/Title	Phone
Inspectors:	URSULA SCHALER	OEPA/ENV. SPEC. II	(216) 425-9171
	FRANK POPOTNIK	OEPA/SUPERVISOR	"
	PAUL DOLENSKY	OEPA/ENV. SPEC. II	"
Facility Representative:	RUDY ZUPAN	MASTER METALS	(216) 621-2361

STATUS

Cond. Ex. SQG___ SQG___ Large Quantity Generator ✓
Treatment___ Storage___ Disposal___ Transporter___

Part A Permit: (yes) ✓ (no) ____ Part B Permit: (yes) ____ (no) ✓
LDR Checklist Attached: (yes) ✓ (no) ____

ACTIVITIES

Containers ✓
Tanks ✓
Wastepile___
Landfill___
Surface Impoundment___

Used oil burner___
Hazardous waste fuel burner/blender___
Incineration/Thermal treatment___
Land treatment___
Groundwater monitoring___

Revised: (5/29/92)
FINAL

REMARKS - GENERAL INFORMATION

Include a list of wastes being managed at the site and a brief description of site activity and waste handling procedures:

Master Metals, Inc. is a secondary lead smelting facility, that reclaims lead with two rotary furnaces. Master Metals accepts lead dross, Industrial batteries, scrap & other residues (D008), and lead baghouse dust (K069) from off-site. The battery scrap is exempt from manifesting. D002 is generated from the cracking of the batteries. Clean Harbors pumps the UST where the D002 is generated and takes it off-site for treatment. A revised Ohio Part B Permit was submitted April 1992.

Master Metals, Inc. is presently shut down by Ohio EPA Director's Order issued August 5, 1993.

FACILITY INSPECTION
WASTE MANAGEMENT ACTIVITIES SUMMARY

DESCRIPTION OF WASTE			ON SITE MANAGEMENT											OFF SITE MANAGEMENT
EPA WASTE CODE	QTY GEN PER MO.	PROCESS/ACTIVITY GENERATING WASTE	GENERATOR			TSD	TYPE OF ON-SITE TREATMENT (WHERE APPLICABLE)	RECYCLED	CONTAINER	IMPOUNDMENT	TANK	WASTE PILE	LANDFILL	DESCRIPTION OF OFF SITE MANAGEMENT
			LESS THAN 90 DAYS	LESS THAN 180 DAYS	LESS THAN 270 DAYS									
K069	?	receives Baghouse Flue Dust from off-site Secondary Pb smelter				✓			✓					
K069		Secondary lead flue dust generated on-site				✓			✓					
D008		mixture of Pb dross industrial batteries scrap & other residues				✓			✓					
D002		generate sulfuric acid <90 day storage acid from battery cracking	✓								✓			tote tank for accumulation Clean Harbors for treatment.

PERMIT STATUS

GENERAL REQUIREMENTS	Y/N/NA	RMK #
1. Has the owner/operator submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?	Y	
When was the owner/operator's Part A submitted: _____		
2. Is the owner/operator operating in compliance with the terms and conditions of its HWFB permit?	N/A	
If not, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51?	N/A	
If yes, what date was the PCR submitted? _____		
3. Has the owner/operator submitted a Part B?	Y	
PERMIT BY RULE REQUIREMENTS		
4. Has there been a rule or statute change which has caused the owner/operator to become subject to Ohio's hazardous waste facility permitting requirements?	Y	
a. If so, please describe the rule change below:		
b. What was the effective date of the rule or statute change in Ohio?		
c. Did the owner/operator submit a Part A to the Director in accordance with the requirements of OAC rule 3745-50-40(C)(D)?	Y	

NOTE: In accordance with 3745-50-40(D), owners/operators are required to submit the Part A within 30 days after the date they first become subject to Ohio's TSD facility standards. Small quantity generators who treat, store or dispose of wastes were required to submit a Part A by the effective date OAC Rule 3745-50-40. [See OAC Rule 3745-50-40]

d. Did the owner/operator notify the US EPA of its hazardous waste activity? [3745-50-40(C)(1)(a)]	Y	
i. What was the date of notification? _____		

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS

IDENTIFICATION NUMBER (OAC 3745-65-11)	Y/N/NA	RMK #
1. Has the facility owner/operator received an identification number from Ohio EPA (or US EPA) as required by OAC 3745-65-11?	Y	
ANNUAL REPORT REQUIREMENT (OAC 3745-65-75)		
2. Has the owner/operator submitted an annual Treatment-Storage-Disposal report to the Director of Ohio EPA by March 1st of each calendar year? [3745-65-75]	Y	
WASTE ANALYSIS/WASTE ANALYSIS PLAN (OAC 3745-65-13)		
3. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat, store or dispose of the waste as required by 3745-65-13(A)(1)?	N	waste analysis WPF's must be updated
4. Is the waste analysis repeated when a process or operation generating hazardous waste changes? [3745-65-13(A)(3)(a)]	N	waste analysis must be updated
5. **For off-site facilities;** Is the waste analysis repeated when results of inspections under 3745-65-13(A)(4) reveal hazardous waste received at the facility does not match the waste designated on the accompanying manifest? [3745-65-13(A)(3)(b)]	N	manifest #s 93015 & 93025 had waste codes D005, D006, D0 not authorized to accept.
6. Does o/o have a written waste analysis plan which includes the following information [3745-65-13(B)(1) through (6)]:		
a. The parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters? [3745-65-13(B)(1)]	Y	
b. The test methods to be used? [3745-65-13(B)(2)]	Y	
c. The sampling method which will be used, either one of the sampling methods described in Appendix I of 3745-51-20 or an equivalent method as defined in OAC 3745-50-10? [3745-65-13(B)(3)(a)(b)]	Y	
d. The frequency with which the initial analysis of the waste will be reviewed/repeated to ensure that the analysis is accurate and up-to-date? [3745-65-13(B)(4)]		
e. **FOR OFF-SITE FACILITIES:** The waste analysis that hazardous waste generators have agreed to supply? [3745-65-13(B)(5)]	Y	

	Y/N/NA	RMK #

f. **FOR OFF-SITE FACILITIES:** The sampling methods and procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identification of the waste on the manifest [3745-65-13(C)]? — Y

g. **FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER 3745-59-04(A):** — N/A

Does the waste analysis plan include procedures and schedules for:

i. The sampling of impoundment contents? [3745-65-13(B)(7)] — N/A

ii. The analysis of test data? [3745-65-13(B)(7)]

iii. The annual removal of residues which are not delisted or which exhibit the characteristic of a hazardous waste and either do not meet treatment standards (3745-59-44) or where no treatment standards have been established? [3745-65-13(B)(7)

h. **Where applicable:** The methods which will be used to meet the additional waste analysis requirements of rules 3745-59-07, 3745-67-25, 3745-67-52, 3745-67-73, 3745-68-14, 3745-68-41, 3745-68-75 and 3745-69-02 of the OAC? [3745-65-13(B)(6)]

WASTE ANALYSIS PLAN - LDR REQUIREMENTS

NOTE: The following requirements identified in Question #7 apply to both on-site and off-site TSD facilities.

7. In accordance with OAC Rule 3745-65-13(B)(6), does the the facility's waste analysis plan includes analytical procedures necessary to ensure compliance with the land disposal restriction requirements of Chapter 3745-59, including:

a. Procedures for conducting the TCLP for wastes which have a CCWE treatment standard? — Y

b. Procedures for conducting a total constituent analysis for wastes which have a CCWE treatment standard? — Y

OPERATING RECORD REQUIREMENTS (OAC 3745-65-73)	Y/N/NA	RMK #
1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73 which contains the following information:		
a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)]	Y	
b. As required by the Appendix to 3745-65-73, does the information specified in Question 1a include:		
i. Common name, EPA hazardous waste identification number and physical state (solid, liquid, gas) of the waste?	Y	
ii. The estimated (or actual) weight, volume or density of the waste?	Y	
iii. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745-65-73?	Y	
c. The present physical location of each hazardous waste within the facility and cross references to specific manifest document numbers?	Y	
d. Records of incidents which required implementation of the contingency plan?	N/A	
e. Records of any waste analyses and trial tests required to be performed?	Y	
f. Records of the inspections required by the general inspection requirements under 3745-65-15?	N	failed to inspect weekly
g. Records of any monitoring, or analytical data required under other subparts as referenced by 3745-65-73(B)(6)?	Y	
h. **FOR DISPOSAL FACILITIES**, location and quantity of each hazardous waste recorded on a facility map and cross-references to manifest document numbers? [3745-65-73(B)(2)]	N/A	
i. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required by OAC 3745-66?	N/A	

	Y/N/NA	RMK #
2. Does the operating record include documentation required to be maintained under the land disposal restriction requirements of Chapter 3745-59? [3745-65-73(b)(9) through (14)]	Y	

NOTE: The following recordkeeping requirements are applicable only to off-site TSDS.

3. Are manifests received by the facility signed and dated? [3745-65-71(A)(1)]	Y	
4. Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)]	Y	
a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)]?	N/A	
b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) noted in writing on the manifest document?	N	
5. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) or has the o/o submitted the required information to the Director?	N	manifest # 93015, 93025 have D005, D006 D007 waste codes not authorized to accept.
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) been submitted to the Director within 15 days?	N	

REMARKS - OPERATING RECORD REQUIREMENTS

GENERAL INSPECTION REQUIREMENTS (OAC 3745-65-15)	Y/N/NA	RMK #
1. Does the o/o inspect the facility on a weekly basis for malfunctions, deterioration, operator errors and discharges which may cause a release of hazardous waste or hazardous waste constituents or may pose a threat to human health? [3745-65-15(A)(1)(2)] If so,	Y	
a. Are the inspections recorded in an inspection log or summary as required by 3745-65-15(D)? [3745-65-15(A)]	Y	
b. Do records contain date and time of inspection, name of inspector, notation of observations made and date and nature of any repairs or remedial actions as required by 3745-65-15(D)? [3745-65-15(A)]	N	Week of July 19, 199 weekly inspection not completed.
c. Are inspection records maintained at the facility for at least (3) years as required by 3745-65-15(D)? [3745-65-15(A)]	N	"
2. Has the owner/operator developed a written inspection schedule for inspecting; monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment (e.g. dikes, sumps)? [3745-65-15(B)] If so,	Y	
a. Is the schedule kept at the facility? [3745-65-15(B)(2)]	Y	
b. Does the schedule identify the types of problems which are to be looked for during the inspection? [3745-65-15(B)(3)]	Y	
c. Does the schedule include inspection of areas subject to spills (i.e. loading and unloading areas) daily when in use and according to other applicable regulations when not in use? [3745-65-16(B)(4)]	Y	

NOTE: See Preparedness and Prevention checklist for additional testing/recordkeeping requirements applicable to emergency equipment.

REMARKS - GENERAL INSPECTION REQUIREMENTS

SECURITY REQUIREMENTS (OAC 3745-65-14)	Y/N/NA	RMK #
1. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)]	N/A	
b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)]	N/A	

IF BOTH 1A AND 1B ARE NO, MARK QUESTIONS 2 AND 3 NOT APPLICABLE.

2. Does the facility have -		
a. A 24-hour surveillance system, **or;**	Y	
b. An artificial or natural barrier <u>and</u> a means to control entry at all times? [3745-65-14(B)(2)(a)(b)]	Y	
3. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary? [3745-65-14(C)]	Y	

REMARKS - SECURITY REQUIREMENTS

PERSONNEL TRAINING (OAC 3745-65-16)	Y/N/NA	RMK #
1. Does the generator provide a personnel training program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan? [3745-52-34(A)(4)]	Y	
2. Does the generator provide personnel training to new employees within 6 months after the date of employment as required by 3745-65-16(B)? [3745-52-34(A)(4)]	N	need to put employee hire date on records.
3. Does the generator provide an annual refresher training course as required by 3745-65-16(B)? [3745-52-34(A)(4)]	Y	
4. Does the generator keep all the records required by 3745-65-16(D)(E) including; written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)]	Y	

REMARKS - PERSONNEL TRAINING REQUIREMENTS

CONTINGENCY PLAN (OAC 3745-65-50 THROUGH 3745-65-56)	Y/N/NA	RMK #
1. Does the o/o have a written contingency plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components: [3745-65-52(A)(B)(C)(D)(E)]		
a. Actions to be taken by personnel in the event of an emergency?	Y	
b. Arrangements or agreements with local or state emergency authorities?	Y	
c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?	Y	
d. A list of all emergency equipment including location, physical description and outline of capabilities?	Y	
e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)]?	Y	
2. Is the contingency plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51(A)]	Y	
3. Is a copy of the contingency plan and any plan revisions maintained on-site and has the plan been submitted to all local and state emergency authorities that might be required to participate in execution of the plan? [3745-65-53(A)(B)]	Y	
4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54]	Y	
5. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the contingency plan designated at all times (on-site or on-call)? [3745-65-55]	Y	
6. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the contingency plan and taken all of the actions and made all of the notifications necessary under 3745-65-56(A-J)?	Y	

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37) **Y/N/NA** **RMK #**

1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] — N

2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection? — N

   a. If yes, was the contingency plan implemented? [3745-65-51(B)]

NOTE: Small quantity generators are not required to maintain a contingency plan. Question #2(a) is, therefore, not applicable to SQGs.

3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)]

   a. Internal alarm system? — Y

   b. Access to telephone, radio or other device for summoning emergency assistance? — Y

   c. Portable fire control equipment, spill control and decontamination equipment? — Y

   d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers? — Y

4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33] — N — week of July 19 weekly inspection was not completed

   a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, name of person conducting the test, observations made, and date and nature of any repairs? — Y

5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] — Y

6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35] — N — Drum storage area is not maintained with 3 foot aisle space between drum rows

	Y/N/NA	RMK #
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)]	Y	
8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented? [3745-65-37(B)]	N	

REMARKS - CONTINGENCY PLAN/PREPAREDNESS AND PREVENTION REQUIREMENTS

USE AND MANAGEMENT OF CONTAINERS (OAC 3745-66-70 TO 3745-66-77)	Y/N/NA	RMK #
1. Are hazardous wastes stored in containers which are:		
a. Closed? [3745-66-73(A)]	N	
b. In good condition? [3745-66-71]	N	
c. Compatible with wastes stored in them? [3745-66-72]	Y	
2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)]	N	drum lids not secu on drums in storage area
3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)]	N	drum lids not secured on drums storage area
4. Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74]	Y	daily inspection
5. Is the facility recording inspections described in Question #4 in an inspection log or inspection summary as required by OAC 3745-66-74(B) which contains the following information:		
a. Date and time of inspections?	Y	
b. Name of inspector?	Y	
c. Notation of observations made during the inspection?	Y	
d. The date and nature of any repairs or other remedial action?	Y	
6. Are ignitable and/or reactive hazardous waste(s) being managed at the facility? If so,	N/A	
a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	N/A	
b. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)]	N/A	

NOTE: Small Quantity Generators are not required to comply with OAC Rule 3745-66-67 (except for wastes being accumulated in satellite accumulation areas). [See OAC Rules 3745-52-34(D)(2) and (C)(1)(a)]

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23) **Y/N/NA RMK #**

1. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:

   a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, US EPA form 8700-22 in compliance with 3745-52-20(A)? Y ____

   b. The manifest contains all information required by 3745-52-20 and the minimum number of copies required by 3745-52-22? Y ____

   c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E)? Y ____

   d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23 (A)(1)(2)? Y ____

2. Has the generator received a return copy of each completed manifest within thirty-five (35) days of the date the waste was accepted by the initial transporter? Y ____

   a. If not, has the generator complied with the manifest exception reporting requirements in 3745-52-42? ____ ____

NOTE: The manifest exception reporting requirement identified in Question #2 above is applicable to large quantity generators only. See Question #3 for manifest exception reporting requirements for small quantity generators.

3. If the generator is acting as a small quantity generator, (> 100 kg but < 1000 kg of hazardous waste in a calendar month) has the generator received a return copy of each completed manifest within sixty days of receipt by the initial transporter? [3745-52-42(B)] N/A ____

   a. If not, did the generator submit a legible copy of the manifest with some indication that the generator has not received confirmation of delivery to the Ohio EPA? [3745-52-42(B)] ____ ____

4. Are signed copies of all hazardous waste manifests and any documentation required for Exception Reports retained for at least 3 years as required by 3745-52-40? Y ____

OAC 3745-66 CLOSURE AND POST CLOSURE

	Y/N/NA	RMK #
1. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12]?	Y	Continuing to be revised by Master Metals, INC
a. A description of how each hazardous waste management unit will be closed in accordance with 3745-66-11?		
b. A description of how final closure will meet the requirements of 3745-66-11?		
c. An estimate of the maximum amount of hazardous waste ever in inventory?		
d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues?		
e. The year closure is expected to begin and a schedule for the various phases of closure?		
f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control?		
2. Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)]		
3. Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director 180 days prior to beginning the closure process? [3745-66-12(D)]		
4. Has the closure plan (and post-closure plan, if applicable) for any non land disposal unit(s) been submitted to the Director 45 days prior to beginning the closure process? [3745-66-12(D)]		
5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)]		
6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)]		
7. Did the owner/operator submit to the Director, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15]		

	Y/N/NA	RMK #
8. Did the owner/operator submit to the local zoning authority and the Director a survey plat in accord- and with OAC 3745-66-16?	_____	_____
9. What permitted units at the facility have been closed in accordance with an approved closure plan?		
_____		
_____		
10. If closure was partial, list the regulated units which remain in use at the faciilty:		
_____		
_____		
11. If required, has the facility prepared a written post-closure plan? [3745-66-18]	_____	_____
If so, does the post-closure plan include:		
a. A description of proposed ground water monitoring?	_____	_____
b. A description of planned maintenance activities?	_____	_____
c. The name, address and phone number of person/office to contact during the post-closure period?	_____	_____
12. **For disposal facilities;** has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19]	_____	_____
13. Has the owner of the property <u>on which a disposal unit is located</u> recorded on the deed that:		
a. The land has been used to manage hazardous waste and the type, quantity and location of waste?	_____	_____
b. Land use is restricted under closure and post-closure rules? [3745-66-19]	_____	_____

REMARKS - CLOSURE/POST CLOSURE REQUIREMENTS

OAC 3745-58-70 SPENT LEAD ACID BATTERIES BEING RECLAIMED

	Y/N/NA	RMK #
1. Does the facility reclaim spent batteries and store them before reclaiming them?	Y	Presently Master metals is closed, per OEPA Director's Orders of August 5, 1993.
a. If so, has the facility notified US EPA under Section 3010 of RCRA?		

Note: In addition to the above, the facility is subject to the applicable provisions of Chapters 3745-55 and 3745-66, Rules 3745-56-20 to 3745-56-59 and 3745-67-20 to 3745-57-57, all provisions of Chapters 3745-54 and 3745-65 except Rules 3745-54-13 and 3745-65-13, 3745-54-71 and 3745-65-71 and 3745-54-72 and 3745-65-72, and all applicable provisions of Rule 3745-50-44. [3745-58-70(B)] Please complete the appropriate checklists to document compliance with these requirements.

OAC CHAPTER 3745-59 - LDR GENERAL REQUIREMENTS

CASE-BY-CASE EXTENSIONS | **Y/N/NA** | **RMK#**

1. Has the entity received an extension for compliance with land disposal restrictions from US EPA pursuant to 40 CFR 268.5? If yes, N/A _____

   (a) List the waste(s) affected:

   (b) Has the extension been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-05(C)] N/A _____

   (c) When does the extension expire? _____

NOTE: A case-by-case extension can be granted for up to one year. The extension is renewable once (by US EPA) for an additional year. Until receiving approval of the extension by US EPA and recognition of the extension by the Director of Ohio EPA, the entity must continue to manage the waste in accordance with all applicable LDR requirements.

VARIANCE FROM A TREATMENT STANDARD

2. Has the entity been granted a variance from a treatment standard by US EPA pursuant to 40 CFR 268.44? If yes, N/A _____

   (a) List the waste(s) affected:

   (b) Has the variance been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-44(C)] N/A _____

NOTE: Until the variance has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

NO MIGRATION PETITION | **Y/N/NA** | **RMK#**

3. Has the entity received a variance from US EPA to allow for continued land disposal of untreated LDR wastes based upon a demonstration that there will be no migration from the disposal unit pursuant to 40 CFR 268.6? If yes, N/A _____

   (a) List the waste(s) affected:

   (b) Has the entity's "no migration" demonstration been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-06(C)] N/A _____

NOTE: Until the no migration petition has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

PROHIBITION AGAINST DILUTION

4. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [O.A.C. Rule 3745-59-03; 40 CFR 268.3]

   (a) As a substitute for adequate treatment to achieve compliance with LDR treatment standards? N/A _____

   (b) To circumvent the effective date of a prohibition (e.g. to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)? N/A _____

   (c) To otherwise avoid a prohibition in O.A.C. Rules 3745-59-30 through 3745-59-35 (40 CFR 268.30 through 268.35)? N/A _____

   (d) To otherwise avoid a prohibition imposed by Section 3004 of RCRA? N/A _____

NOTE: If the answer to any of the Questions 4(a) through 4(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of O.A.C. Rule 3745-59-03 (40 CFR 268.3).

NOTE: Dilution of wastes is permissible under some conditions. See O.A.C. Rule 3745-59-03(B) (40 CFR 268.3) and the Third Third final rule preamble for additional information.

LDR - GENERATOR REQUIREMENTS

NOTE: The following requirements apply only to large quantity generators and small quantity generators. Conditionally exempt small quantity generators are exempt from land disposal restriction requirements as referenced in O.A.C. Rules 3745-59-01(E)(1) (40 CFR 268.1(e)(1)) and 3745-51-05(B) (40 CFR 261.5(b)).

EVALUATION OF WASTES/DETERMINING APPROPRIATE TREATMENT STANDARDS	Y/N/NA	RMK#
1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]	Y	
(a) **For determinations based solely on knowledge of the waste:** Is supporting data used to make this determination being retained on-site? [O.A.C. Rule 3745-59-07(A)(5); 40 CFR 268.7(a)(5)]	Y	
(b) **For determinations based upon analytical testing:** Is a copy of waste analysis data being retained on-site? [O.A.C. Rule 3745-59-07(A)(5); 40 CFR 268.7(a)(5)]	Y	
2. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g. wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]	Y	
3. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]	N	
4. Does the entity generate any listed waste(s) which are restricted from land disposal? If so,		
(a) Do such wastes also exhibit hazardous waste characteristics as identified in O.A.C. Rules 3745-51-20 to 3745-52-24? (40 CFR 261.20 through 261.24)?		
(b) **For listed wastes which also exhibit a characteristic:** Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [O.A.C. Rule 3745-59-09(A); 40 CFR 268.9(a)]		

NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g. a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See O.A.C. Rule 3745-59-09(B); 40 CFR 268.9(b)]

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE	Y/N/NA	RMK#
5. Does the generator treat characteristic hazardous waste(s) in a RCRA-exempt unit to render such wastes non-hazardous?	N	
(a) If so, are treated waste(s) sent to a licensed solid waste disposal facility?		
i. If so, with each shipment of waste, does the generator submit a notification and certification to the Regional Administrator/Director which contains the following:		
a. Name and address of the facility receiving the waste? [O.A.C. Rule 3745-59-09(D)(1)(a); 40 CFR 268.9(d)(1)(i)]		
b. A description of the waste as initially generated, including EPA hazardous waste numbers and treatability group? [O.A.C. [Rule 3745-59-09(D)(1)(b); 40 CFR 268.9 (d)(1)(ii)]		
c. The treatment standards applicable to the waste at the initial point of generation? [O.A.C. Rule 3745-59-09(D)(1)(c); 40 CFR 268.9(d)(1)(iii)]		
ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07(B)(5)(a) (40 CFR 268.7 (b)(5)(i)? [O.A.C. Rule 3745-59-09(D)(2); 40 CFR 268.9(d)(2)]		

NOTE: An example of a RCRA-exempt unit would include an elementary neutralization unit or a wastewater treatment unit as defined by O.A.C. Rule 3745-50-10. [See O.A.C. Rule 3745-65-01]

REMARKS

NOTIFICATION/CERTIFICATION	Y/N/NA	RMK#
6. **For wastes that do not meet treatment standards:** Does the generator notify the treatment/storage facility receiving the wastes, in writing, that wastes being received do not meet treatment standards? [O.A.C. Rule 3745-59-07(A)(1); 40 CFR 268.7(a)(1)]	N	
If so, does the notification include the following:		
(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A)(1)(a); 40 CFR 268.7(a)(1)(i)]	N	
(b) Appropriate treatment standard for the waste? [O.A.C. Rule 3745-59-07(A)(1)(b); 40 CFR 268.7(a)(1)(ii)]	N	
(c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A)(1)(c); 40 CFR 268.7(a)(i)(iii)]	N	
(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(1)(d); 40 CFR 268.7(a)(1)(iv)]	N	
7. Is the notification identified in Question #6 submitted with each shipment of waste? [O.A.C. Rule 3745-59-07(A)(1); 40 CFR 268.7(a)(1)]	N	
8. **For wastes that meet treatment standards:** Does the generator submit a written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [O.A.C. Rule 3745-59-07(A)(2); 40 CFR 268.7(a)(2)]		
If so, does the notice/certification include the following:		
(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A)(2)(a)(i); 40 CFR 268.7(a)(2)(i)(A)]	N	
(b) The corresponding treatment standards and applicable prohibitions for the waste? [O.A.C. Rule 3745-59-07(A)(2)(a)(ii); 40 CFR 268.7(a)(2)(i)(B)]	N	
(c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A)(2)(a)(iii); 40 CFR 268.7(a)(2)(i)(C)]	N	
(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(2)(a)(iv); 40 CFR 268.7(a)(2)(i)(D)]	N	
(e) Is the certification signed by the generator or an authorized representative? [O.A.C. Rule 3745-59-07(A)(2)(b); 40 CFR 268.7(a)(2)(ii)]	N	

		Y/N/NA	RMK#
9.	Is the notification/certification identified in Question #8 submitted with each shipment of waste? [O.A.C. 3745-59-07 (A)(2); 40 CFR 268.7(a)(2)]	N	
10.	**For wastes subject to a case-by-case extension, exemption or a variance:** Does the generator provide written notice to the facility receiving the waste that the waste is not prohibited from land disposal? [O.A.C. Rule 3745-59-07 (A)(3); 40 CFR 268.7(a)(3)]	N/A	
	If so, does the notice contain the following information:		
	(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07 (A)(3)(a); 40 CFR 268.7(a)(3)(i)]		
	(b) The corresponding treatment standard and applicable prohibitions? [O.A.C. Rule 3745-59-07(A)(3)(b); 40 CFR 268.7(a)(3)(ii)]		
	(c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A)(3)(c); 40 CFR 268.7(a)(3)(iii)]		
	(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(3)(d); 40 CFR 268.6(a)(3)(iv)]		
	(e) The date the waste is subject to the prohibitions? [O.A.C. Rule 3745-59-07(A)(3)(e); 40 CFR 268.7(a)(3)(v)]		
11.	Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least five years? [O.A.C. Rule 3745-59-07(A)(6); 40 CFR 268.7(a)(7)]	Y	

REMARKS

LDR - TREATMENT FACILITY REQUIREMENTS

REQUIRED TREATMENT	Y/N/NA	RMK#
1. Does the facility treat any restricted wastes for which a specified technology (or technologies) has/have been established as the LDR treatment standard?	N/A	
(a) If so, is the facility using the appropriate technology as required by O.A.C. Rule 3745-59-42 (40 CFR 268.42)?		
(b) If not, has US EPA granted the facility approval to use an alternative treatment method other than the required technology? [O.A.C. Rule 3745-59-42(B); 40 CFR 268.42(b)]		
2. Does the facility treat restricted wastes for which a concentration level has been established as the LDR treatment standard?		
If so, does the treatment facility test its waste treatment residues according to the following requirements:		
(a) For wastes with treatment standards expressed as a concentration in the waste extract (a CCWE standard found in O.A.C. Rule 3745-59-41; 40 CFR 268.41):		
Following treatment, does the treatment facility test the treatment residues or an extract of such residues using the TCLP test to assure that the residues or extract meet the applicable treatment standard? [O.A.C. Rule 3745-59-07(B)(1); 40 CFR 268.7(b)(1)]		
(b) For wastes with treatment standards expressed as concentrations in the waste (a CCW standard found in Rule 3745-59-43; 40 CFR 268.43):		
Does the treatment facility test treatment residues (not an extract of such residues) using a total constituent analysis to assure that the residues meet applicable treatment standards? [O.A.C. Rule 3745-59-07(B)(3); 40 CFR 268.7(b)(3)]		
3. Does the treatment facility combine waste streams together for the purposes of treatment which have a concentration based LDR treatment standard for the same constituent(s)?		
(a) If so, does the treatment facility ensure that the more stringent standard for the mixture is met? [O.A.C. Rule 3745-59-41(B) and 3745-59-43(B); 40 CFR 268.41(b) and 268.43(b)]		

OFF-SITE SHIPMENTS - NOTIFICATION/CERTIFICATION REQS.	Y/N/NA	RMK#
4. **For all restricted wastes:** Does the treatment facility have hazardous waste and/or treatment residues shipped off-site for land disposal?	N/A	
If so, does the treatment facility provide the land disposal facility with a written notice containing the following:		
(a) EPA hazardous waste number? [3745-59-07(B)(4)(a); 40 CFR 268.7(b)(4)(i)]		
(b) The corresponding treatment standards and applicable prohibitions for each waste? [3745-59-07(B)(4)(b); 40 CFR 268.7(b)(4)(ii)]		
(c) The manifest number associated with the shipment of waste? [3745-59-07(B)(4)(c); 40 CFR 268.7(b)(4)(iii)]		
(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(B)(4)(d); 40 CFR 268.7(b)(4)(iv)]		
5. Does the facility have any wastes and/or treatment residues shipped off-site for disposal which have been generated from treatment of a restricted waste to meet treatment standards? If so,	N/A	
For wastes and/or treatment residues generated from the treatment of a waste which has a **concentration based** treatment standard:		
(a) Does the treatment facility also submit a written certification with each shipment of waste or treatment residue stating that the waste has been treated in compliance with applicable treatment standards? [O.A.C. Rule 3745-59-07(B)(5); 40 CFR 268.7(b)(5)]		
(b) Does the certification contain the language as required by O.A.C. Rule 3745-59-07(B)(5)(a) (40 CFR 268.7(b)(5)(i))?		
For wastes and/or treatment residues generated from the treatment of a waste which has a **technology based** treatment standard:		
(c) With each shipment of treatment residue shipped off-site for disposal, does the treatment facility submit a certification stating that the waste has been treated in accordance with the appropriate treatment technology as specified in O.A.C. Rule 3745-59-42 (40 CFR 268.42)? [O.A.C. Rule 3745-59-07(B)(5); 40 CFR 268.7(b)(5)]		

	Y/N/NA	RMK#
(d) Is the certification signed by an authorized representative and does it contain the language as specified in O.A.C. Rule 3745-59-07(B)(5)(b) (40 CFR 268.7(b)(5)(ii)?	N/A	
6. Does the treatment facility have wastes shipped off-site that do not meet treatment standards and/or wastes that must be further managed at a different treatment or storage facility? If so,	N/A	
(a) Is the facility complying with the generator notification requirements? [O.A.C. Rule 3745-59-07(B)(6); 40 CFR 268.7(b)(6)]		

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

7. Does the facility treat characteristic hazardous waste(s) to render such waste(s) non-hazardous?	N	
(a) If so, are treated waste(s) sent to a licensed solid waste disposal facility?		
i. If so, with each shipment of waste, does the generator submit a notification/certification to the Regional Administrator/Director which contains the following:		
a. Name and address of the facility receiving the waste? [O.A.C. Rule 3745-59-09(D)(1)(a); 40 CFR 268.9(d)(1)(i)]		
b. A description of the waste as initially generated, including EPA hazardous waste numbers and treatability group? [O.A.C. Rule 3745-59-09(D)(1)(b); 40 CFR 268.9(d)(1)(ii)]		
c. The treatment standards applicable to the waste at the initial point of generation? [O.A.C. Rule 3745-59-09(D)(1)(c); 40 CFR 268.9(d)(1)(iii)]		
ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07(B)(5)(a) (40 CFR 268.7(b)(5)(i)? [O.A.C. Rule 3745-59-09(D)(2); 40 CFR 268.9(d)(2)]		

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

LDR - LAND DISPOSAL FACILITY REQUIREMENTS

		Y/N/NA	RMK#
1.	Does the land disposal facility retain copies of LDR notices and certifications? [O.A.C. Rule 3745-59-07(C)(1); 40 CFR 268.7(c)(1)]	N/A	
2.	Does the land disposal facility test the waste or an extract of the waste or treatment residue received in accordance with the the facility's waste analysis plan to ensure compliance with applicable LDR treatment standards, including: [O.A.C. Rule 3745-59-07(C)(2); 40 CFR 268.7(c)(2)]		
	(a) Conducting the TCLP to test waste/residues which have a CCWE concentration based treatment standard? [O.A.C. Rule 3745-59-07(C)(2); 40 CFR 268.7(c)(2)]		
	(b) Conducting a total constituent analysis to test waste/residues which have a CCW concentration based treatment standard? [O.A.C. Rule 3745-59-07(C)(2); 40 CFR 268.7(c)(2)]		
	(c) Is testing specified in 2(a) and 2(b) conducted in accordance with the frequency set forth in the facility's waste analysis plan? [O.A.C. Rule 3745-59-07(C)(2); 40 CFR 268.7(c)(2)]		
NOTE:	Analytical testing of residues which have been generated from treatment of a waste which has a technology based treatment standard only is not required.		
3.	Where applicable, does the land disposal facility ensure that only restricted wastes/residues which meet applicable concentration based treatment standards of O.A.C. rules 3745-59-41 or 3745-59-43 (268.41 or 268.43) are disposed of? [O.A.C. Rule 3745-59-40(A),(C); 40 CFR 268.40(a),(c)]		
4.	Where applicable, does the land disposal facility ensure that only restricted wastes/residues which have been treated using the specified technology of O.A.C. Rule 3745-59-42 (40 CFR 268.42) are disposed of? [O.A.C. Rule 3745-59-40(B); 40 CFR 268.40(b)]		

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

Y/N/NA RMK#

(g) The owner/operator has submitted a written certification to the Director which states that the surface impoundment meets the above requirements referenced in Questions 1(a) through (f)? [O.A.C. Rule 3745-59-04(A)(4); 40 CFR 268.4(a)(4)] N/A

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

REMARKS

RCRA HAZARDOUS WASTE FACILITY
COMPLIANCE EVALUATION INSPECTION CHECKLIST

Facility: MASTER METALS

USEPA I.D.: OHD 097 613 871 HWFB No.: _____

Street: 2850 WEST THIRD STREET

City: CLEVELAND State: OH Zip: 44113

County: CUYAHOGA Telphone: (216) 621-2361

Fax No: _____ PUCO No.: _____

Owner/Operator: SAME AS ABOVE

Street: _____

City: _____ State: _____ Zip: _____

Telephone: _____ Fax: _____

Inspection Date: 9/28/29/92 Time: 9:00AM 3:00P.M

Advance notice of inspection given? (yes) ✓ (no) ____
If so, how far in advance? 1 week

	Name	Agency/Title	Phone
Inspectors:	Ursula Schaler	OEPA/Env. Spec. II	(216) 425-9171
	Paul Anderson	OEPA/Supervisor	(216) 425-9171
	Scott Williams	OEPA/Env. Spec. II	(216) 425-9171
Facility Representative:	Bob Casarona	Master Metals Attorney	

STATUS

Cond. Ex. SQG___ SQG___ Large Quantity Generator ✓
Treatment___ Storage___ Disposal___ Transporter___

Part A Permit: (yes) ✓ (no) ___ Part B Permit: (yes) ___ (no) ✓
LDR Checklist Attached: (yes) ✓ (no) ___

ACTIVITIES

Containers ✓
Tanks ✓
Wastepile___
Landfill___
Surface Impoundment___

Used oil burner___
Hazardous waste fuel burner/blender___
Incineration/Thermal treatment___
Land treatment___
Groundwater monitoring___

Revised: (5/29/92)
FINAL

REMARKS - GENERAL INFORMATION

Include a list of wastes being managed at the site and a brief description of site activity and waste handling procedures:

Master Metals, Inc. is a secondary lead smelting facility, that reclaims lead with two rotary furnaces. Master Metals accepts lead dross, Industrial batteries, scrap & other residues (D008), and lead baghouse dust (K069) from off-site. The battery scrap is exempt from manifesting. D002 is generated from the cracking of the batteries. Clean Harbors pumps the UST where the D002 is generated and takes it off-site for treatment. A revised Ohio Part B Permit was submitted April 1992.

Master Metals, Inc. is presently shut down by Ohio EPA Findings and Orders from the Air and Hazardous Waste Divisions, issued August 1992.

(5/29/92)
FINAL

FACILITY INSPECTION
WASTE MANAGEMENT ACTIVITIES SUMMARY

DESCRIPTION OF WASTE			ON SITE MANAGEMENT											OFF SITE MANAGEMENT
EPA WASTE CODE	QTY GEN PER MO.	PROCESS/ACTIVITY GENERATING WASTE	GENERATOR: LESS THAN 90 DAYS	GENERATOR: LESS THAN 180 DAYS	GENERATOR: LESS THAN 270 DAYS	TSD	TYPE OF ON-SITE TREATMENT (WHERE APPLICABLE)	RECYCLED	CONTAINER	IMPOUNDMENT	TANK	WASTE PILE	LANDFILL	DESCRIPTION OF OFF SITE MANAGEMENT
K069		receives baghouse fine dust from offsite secondary Pb smelter				✓			✓					
K069		secondary lead flue dust generated on-site				✓			✓					
D008		mixture of Pb dross, industrial batteries, scrap & other residues.				✓			✓					
D002		generate sulfuric acid <90 day storage acid from battery crackers	✓								✓			tote tank for accumulation Clean Harbors for treatment.

PERMIT STATUS

GENERAL REQUIREMENTS	Y/N/NA	RMK #
1. Has the owner/operator submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?	Y	
When was the owner/operator's Part A submitted: _____		
2. Is the owner/operator operating in compliance with the terms and conditions of its HWFB permit?	N/A	
If not, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51?	N/A	
If yes, what date was the PCR submitted? _____		
3. Has the owner/operator submitted a Part B?	Y	
PERMIT BY RULE REQUIREMENTS		
4. Has there been a rule or statute change which has caused the owner/operator to become subject to Ohio's hazardous waste facility permitting requirements?	Y	
a. If so, please describe the rule change below:		
b. What was the effective date of the rule or statute change in Ohio?		
c. Did the owner/operator submit a Part A to the Director in accordance with the requirements of OAC rule 3745-50-40(C)(D)?	Y	

NOTE: In accordance with 3745-50-40(D), owners/operators are required to submit the Part A within 30 days after the date they first become subject to Ohio's TSD facility standards. Small quantity generators who treat, store or dispose of wastes were required to submit a Part A by the effective date OAC Rule 3745-50-40. [See OAC Rule 3745-50-40]

d. Did the owner/operator notify the US EPA of its hazardous waste activity? [3745-50-40(C)(1)(a)]	Y	
i. What was the date of notification? _____		

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS

IDENTIFICATION NUMBER (OAC 3745-65-11)	Y/N/NA	RMK #
1. Has the facility owner/operator received an identification number from Ohio EPA (or US EPA) as required by OAC 3745-65-11?	Y	
ANNUAL REPORT REQUIREMENT (OAC 3745-65-75)		
2. Has the owner/operator submitted an annual Treatment-Storage-Disposal report to the Director of Ohio EPA by March 1st of each calendar year? [3745-65-75]	Y	
WASTE ANALYSIS/WASTE ANALYSIS PLAN (OAC 3745-65-13)		
3. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat, store or dispose of the waste as required by 3745-65-13(A)(1)?	N	Waste analysis on WPFIs must be updated
4. Is the waste analysis repeated when a process or operation generating hazardous waste changes? [3745-65-13(A)(3)(a)]	N	Waste analysis must be updated
5. For off-site facilities; Is the waste analysis repeated when results of inspections under 3745-65-13(A)(4) reveal hazardous waste received at the facility does not match the waste designated on the accompanying manifest? [3745-65-13(A)(3)(b)]	Y	
6. Does o/o have a written waste analysis plan which includes the following information [3745-65-13(B)(1) through (6)]:		
a. The parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters? [3745-65-13(B)(1)]	Y	
b. The test methods to be used? [3745-65-13(B)(2)]	Y	
c. The sampling method which will be used, either one of the sampling methods described in Appendix I of 3745-51-20 or an equivalent method as defined in OAC 3745-50-10? [3745-65-13(B)(3)(a)(b)]	Y	
d. The frequency with which the initial analysis of the waste will be reviewed/repeated to ensure that the analysis is accurate and up-to-date? [3745-65-13(B)(4)]	N	Waste analysis must be updated
e. FOR OFF-SITE FACILITIES: The waste analysis that hazardous waste generators have agreed to supply? [3745-65-13(B)(5)]	Y	

Y/N/NA RMK #

f. FOR OFF-SITE FACILITIES: The sampling methods and procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identification of the waste on the manifest [3745-65-13(C)]? Y

g. FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER 3745-59-04(A): N/A

Does the waste analysis plan include procedures and schedules for:

i. The sampling of impoundment contents? [3745-65-13(B)(7)]

ii. The analysis of test data? [3745-65-13(B)(7)]

iii. The annual removal of residues which are not delisted or which exhibit the characteristic of a hazardous waste and either do not meet treatment standards (3745-59-44) or where no treatment standards have been established? [3745-65-13(B)(7)

h. Where applicable: The methods which will be used to meet the additional waste analysis requirements of rules 3745-59-07, 3745-67-25, 3745-67-52, 3745-67-73, 3745-68-14, 3745-68-41, 3745-68-75 and 3745-69-02 of the OAC? [3745-65-13(B)(6)] Y

WASTE ANALYSIS PLAN - LDR REQUIREMENTS

NOTE: The following requirements identified in Question #7 apply to both on-site and off-site TSD facilities.

7. In accordance with OAC Rule 3745-65-13(B)(6), does the the facility's waste analysis plan includes analytical procedures necessary to ensure compliance with the land disposal restriction requirements of Chapter 3745-59, including:

a. Procedures for conducting the TCLP for wastes which have a CCWE treatment standard? Y

b. Procedures for conducting a total constituent analysis for wastes which have a CCWE treatment standard? Y

OPERATING RECORD REQUIREMENTS (OAC 3745-65-73)	Y/N/NA	RMK. #
1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73 which contains the following information:		
a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)]	Y	
b. As required by the Appendix to 3745-65-73, does the information specified in Question 1a include:		
i. Common name, EPA hazardous waste identification number and physical state (solid, liquid, gas) of the waste?	Y	
ii. The estimated (or actual) weight, volume or density of the waste?	Y	
iii. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745-65-73?	Y	
c. The present physical location of each hazardous waste within the facility and cross references to specific manifest document numbers?	Y	
d. Records of incidents which required implementation of the contingency plan?	N/A	
e. Records of any waste analyses and trial tests required to be performed?	Y	
f. Records of the inspections required by the general inspection requirements under 3745-65-15?	N	failed to inspect daily
g. Records of any monitoring, or analytical data required under other subparts as referenced by 3745-65-73(B)(6)?	Y	
h. FOR DISPOSAL FACILITIES, location and quantity of each hazardous waste recorded on a facility map and cross-references to manifest document numbers? [3745-65-73(B)(2)]	N/A	
i. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required by OAC 3745-66?	N/A	

	Y/N/NA	RMK #
2. Does the operating record include documentation required to be maintained under the land disposal restriction requirements of Chapter 3745-59? [3745-65-73(b)(9) through (14)]	N	NO LAND BAN FORMS ATTACHED TO THE MANIFESTS.
NOTE: The following recordkeeping requirements are applicable only to off-site TSDS.		
3. Are manifests received by the facility signed and dated? [3745-65-71(A)(1)]	N	PA Manifest # PAC 7502036 7/20/92
4. Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)]	Y	
a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)]?	N/A	
b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) noted in writing on the manifest document?	N	
5. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) or has the o/o submitted the required information to the Director?	N	
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) been submitted to the Director within 15 days?	N	

REMARKS - OPERATING RECORD REQUIREMENTS

GENERAL INSPECTION REQUIREMENTS (OAC 3745-65-15) Y/N/NA RMK #

1. Does the o/o inspect the facility on a weekly basis for malfunctions, deterioration, operator errors and discharges which may cause a release of hazardous waste or hazardous waste constituents or may pose a threat to human health? [3745-65-15(A)(1)(2)] If so, Y

   a. Are the inspections recorded in an inspection log or summary as required by 3745-65-15(D)? [3745-65-15(A)] Y

   b. Do records contain date and time of inspection, name of inspector, notation of observations made and date and nature of any repairs or remedial actions as required by 3745-65-15(D)? [3745-65-15(A)] N — Some inspections were not completed repairs were never completed.

   c. Are inspection records maintained at the facility for at least (3) years as required by 3745-65-15(D)? [3745-65-15(A)] N — Some inspections were not filled out

2. Has the owner/operator developed a written inspection schedule for inspecting; monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment (e.g. dikes, sumps)? [3745-65-15(B)] If so, N — Master Metals must develop a written inspection schedule

   a. Is the schedule kept at the facility? [3745-65-15(B)(2)] N

   b. Does the schedule identify the types of problems which are to be looked for during the inspection? [3745-65-15(B)(3)] N

   c. Does the schedule include inspection of areas subject to spills (i.e. loading and unloading areas) daily when in use and according to other applicable regulations when not in use? [3745-65-16(B)(4)] N

NOTE: See Preparedness and Prevention checklist for additional testing/recordkeeping requirements applicable to emergency equipment.

REMARKS - GENERAL INSPECTION REQUIREMENTS

PERSONNEL TRAINING (OAC 3745-65-16) Y/N/NA RMK #

1. Does the facility provide a personnel training program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan?	N	No training records for Joe Sheldon plant manager
2. Does the facility provide personnel training to new employees within 6 months after the date of their employment as required by 3745-65-16(B)?	N	↓
3. Does the facility provide an annual training program refresher course as required by 3745-65-16(B)?	N	No training records for Joe Sheldon
4. Does the facility keep all of the records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records?	N	Contingency plan & and job titles descriptions do not coincide

REMARKS - PERSONNEL TRAINING

CASE-BY-CASE EXTENSIONS Y/N/NA RMK#

1. Has the entity received an extension for compliance with land disposal restrictions from US EPA pursuant to 40 CFR 268.5? If yes, N/A

   (a) List the waste(s) affected:

   (b) Has the extension been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-05(C)] N/A

   (c) When does the extension expire? _____

NOTE: A case-by-case extension can be granted for up to one year. The extension is renewable once (by US EPA) for an additional year. Until receiving approval of the extension by US EPA and recognition of the extension by the Director of Ohio EPA, the entity must continue to manage the waste in accordance with all applicable LDR requirements.

VARIANCE FROM A TREATMENT STANDARD

2. Has the entity been granted a variance from a treatment standard by US EPA pursuant to 40 CFR 268.44? If yes, N/A

   (a) List the waste(s) affected:

   (b) Has the variance been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-44(C)] N/A

NOTE: Until the variance has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

NO MIGRATION PETITION Y/N/NA RMK#

3. Has the entity received a variance from US EPA to allow for continued land disposal of untreated LDR wastes based upon a demonstration that there will be no migration from the disposal unit pursuant to 40 CFR 268.6? If yes, N/A

(a) List the waste(s) affected:

(b) Has the entity's "no migration" demonstration been recognized by the Director of Ohio EPA? [O.A.C. Rule 3745-59-06(C)] N/A

NOTE: Until the no migration petition has been approved by US EPA and recognized by the Director of Ohio EPA, the entity must continue to manage the waste in compliance with the LDR requirements.

PROHIBITION AGAINST DILUTION

4. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [O.A.C. Rule 3745-59-03; 40 CFR 268.3]

(a) As a substitute for adequate treatment to achieve compliance with LDR treatment standards? N/A

(b) To circumvent the effective date of a prohibition (e.g. to dilute a "non-wastewater" waste to a "wastewater" to avoid complying with the "non-wastewater" treatment standard)? N/A

(c) To otherwise avoid a prohibition in O.A.C. Rules 3745-59-30 through 3745-59-35 (40 CFR 268.30 through 268.35)? N/A

(d) To otherwise avoid a prohibition imposed by Section 3004 of RCRA? N/A

NOTE: If the answer to any of the Questions 4(a) through 4(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of O.A.C. Rule 3745-59-03 (40 CFR 268.3).

NOTE: Dilution of wastes is permissible under some conditions. See O.A.C. Rule 3745-59-03(B) (40 CFR 268.3) and the Third Third final rule preamble for additional information.

LDR - GENERATOR REQUIREMENTS

NOTE: The following requirements apply only to large quantity generators and small quantity generators. Conditionally exempt small quantity generators are exempt from land disposal restriction requirements as referenced in O.A.C. Rules 3745-59-01(E)(1) (40 CFR 268.1(e)(1)) and 3745-51-05(B) (40 CFR 261.5(b)).

EVALUATION OF WASTES/DETERMINING APPROPRIATE TREATMENT STANDARDS	Y/N/NA	RMK#
1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]	Y	
(a) For determinations based solely on knowledge of the waste: Is supporting data used to make this determination being retained on-site? [O.A.C. Rule 3745-59-07(A)(5); 40 CFR 268.7(a)(5)]	Y	
(b) For determinations based upon analytical testing: Is a copy of waste analysis data being retained on-site? [O.A.C. Rule 3745-59-07(A)(5); 40 CFR 268.7(a)(5)]	Y	
2. Has the generator determined the correct "treatability group" for each waste restricted from land disposal (e.g. wastewater, non-wastewater, high arsenic, low arsenic, high zinc, low zinc, etc.)? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]	Y	
3. Has the generator correctly determined if restricted wastes meet or exceed treatment standards? [O.A.C. Rule 3745-59-07(A); 40 CFR 268.7(a)]	Y	
4. Does the entity generate any listed waste(s) which are restricted from land disposal? If so,	N	
(a) Do such wastes also exhibit hazardous waste characteristics as identified in O.A.C. Rules 3745-51-20 to 3745-52-24? (40 CFR 261.20 through 261.24)?		
(b) For listed wastes which also exhibit a characteristic: Does the generator also identify the appropriate treatment standard for the constituent(s) which cause the waste to exhibit the characteristic(s)? [O.A.C. Rule 3745-59-09(A); 40 CFR 268.9(a)]		

NOTE: The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g. a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See O.A.C. Rule 3745-59-09(B); 40 CFR 268.9(b)]

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE	Y/N/NA	REMK#
5. Does the generator treat characteristic hazardous waste(s) in a RCRA-exempt unit to render such wastes non-hazardous?	N	
(a) If so, are treated waste(s) sent to a licensed solid waste disposal facility?		
i. If so, with each shipment of waste, does the generator submit a notification and certification to the Regional Administrator/Director which contains the following:		
a. Name and address of the facility receiving the waste? [O.A.C. Rule 3745-59-09(D)(1)(a); 40 CFR 268.9(d)(1)(i)]		
b. A description of the waste as initially generated, including EPA hazardous waste numbers and treatability group? [O.A.C. [Rule 3745-59-09(D)(1)(b); 40 CFR 268.9 (d)(1)(ii)]		
c. The treatment standards applicable to the waste at the initial point of generation? [O.A.C. Rule 3745-59-09(D)(1)(c); 40 CFR 268.9(d)(1)(iii)]		
ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07(B)(5)(a) (40 CFR 268.7 (b)(5)(i)? [O.A.C. Rule 3745-59-09(D)(2); 40 CFR 268.9(d)(2)]		

NOTE: An example of a RCRA-exempt unit would include an elementary neutralization unit or a wastewater treatment unit as defined by O.A.C. Rule 3745-50-10. [See O.A.C. Rule 3745-65-01]

REMARKS

6. For wastes that do not meet treatment standards: Does the generator notify the treatment/storage facility receiving the wastes, in writing, that wastes being received do not meet treatment standards? [O.A.C. Rule 3745-59-07(A)(1); 40 CFR 268.7(a)(1)] N

If so, does the notification include the following:

(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A)(1)(a); 40 CFR 268.7(a)(1)(i)] N

(b) Appropriate treatment standard for the waste? [O.A.C. Rule 3745-59-07(A)(1)(b); 40 CFR 268.7(a)(1)(ii)] N

(c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A)(1)(c); 40 CFR 268.7(a)(i)(iii)] N

(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(1)(d); 40 CFR 268.7(a)(1)(iv)] N

7. Is the notification identified in Question #6 submitted with each shipment of waste? [O.A.C. Rule 3745-59-07(A)(1); 40 CFR 268.7(a)(1)] N

8. For wastes that meet treatment standards: Does the generator submit a written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [O.A.C. Rule 3745-59-07(A)(2); 40 CFR 268.7(a)(2)]

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

(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07(A)(2)(a)(i); 40 CFR 268.7(a)(2)(i)(A)] N

(b) The corresponding treatment standards and applicable prohibitions for the waste? [O.A.C. Rule 3745-59-07(A)(2)(a)(ii); 40 CFR 268.7(a)(2)(i)(B)] N

(c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A)(2)(a)(iii); 40 CFR 268.7(a)(2)(i)(C)] N

(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(2)(a)(iv); 40 CFR 268.7(a)(2)(i)(D)] N

(e) Is the certification signed by the generator or an authorized representative? [O.A.C. Rule 3745-59-07(A)(2)(b); 40 CFR 268.7(a)(2)(ii)] N

	Y/N/NA	RMK#
9. Is the notification/certification identified in Question #8 submitted with each shipment of waste? [O.A.C. 3745-59-07 (A)(2); 40 CFR 268.7(a)(2)]	N	
10. For wastes subject to a case-by-case extension, exemption or a variance: Does the generator provide written notice to the facility receiving the waste that the waste is not prohibited from land disposal? [O.A.C. Rule 3745-59-07 (A)(3); 40 CFR 268.7(a)(3)]	N/A	
If so, does the notice contain the following information:		
(a) EPA hazardous waste number? [O.A.C. Rule 3745-59-07 (A)(3)(a); 40 CFR 268.7(a)(3)(i)]		
(b) The corresponding treatment standard and applicable prohibitions? [O.A.C. Rule 3745-59-07(A)(3)(b); 40 CFR 268.7(a)(3)(ii)]		
(c) The manifest number associated with the shipment of waste? [O.A.C. Rule 3745-59-07(A)(3)(c); 40 CFR 268.7(a)(3)(iii)]		
(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(3)(d); 40 CFR 268.6(a)(3)(iv)]		
(e) The date the waste is subject to the prohibitions? [O.A.C. Rule 3745-59-07(A)(3)(e); 40 CFR 268.7(a)(3)(v)]		
11. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least five years? [O.A.C. Rule 3745-59-07(A)(6); 40 CFR 268.7(a)(7)]	Y	

REMARKS

LDR - TREATMENT FACILITY REQUIREMENTS

REQUIRED TREATMENT	Y/N/NA	RMK#
1. Does the facility treat any restricted wastes for which a specified technology (or technologies) has/have been established as the LDR treatment standard?	N/A	
(a) If so, is the facility using the appropriate technology as required by O.A.C. Rule 3745-59-42 (40 CFR 268.42)?		
(b) If not, has US EPA granted the facility approval to use an alternative treatment method other than the required technology? [O.A.C. Rule 3745-59-42(B); 40 CFR 268.42(b)]		
2. Does the facility treat restricted wastes for which a concentration level has been established as the LDR treatment standard?		
If so, does the treatment facility test its waste treatment residues according to the following requirements:		
(a) For wastes with treatment standards expressed as a concentration in the <u>waste extract</u> (a CCWE standard found in O.A.C. Rule 3745-59-41; 40 CFR 268.41):		
Following treatment, does the treatment facility test the treatment residues or an extract of such residues using the TCLP test to assure that the residues or extract meet the applicable treatment standard? [O.A.C. Rule 3745-59-07(B)(1); 40 CFR 268.7(b)(1)]		
(b) For wastes with treatment standards expressed as concentrations in the <u>waste</u> (a CCW standard found in Rule 3745-59-43; 40 CFR 268.43):		
Does the treatment facility test treatment residues (not an extract of such residues) using a total constituent analysis to assure that the residues meet applicable treatment standards? [O.A.C. Rule 3745-59-07(B)(3); 40 CFR 268.7(b)(3)]		
3. Does the treatment facility combine waste streams together for the purposes of treatment which have a concentration based LDR treatment standard for the same constituent(s)?		
(a) If so, does the treatment facility ensure that the more stringent standard for the mixture is met? [O.A.C. Rule 3745-59-41(B) and 3745-59-43(B); 40 CFR 268.41(b) and 268.43(b)]		

4. For all restricted wastes: Does the treatment facility have hazardous waste and/or treatment residues shipped off-site for land disposal? N/A

If so, does the treatment facility provide the land disposal facility with a written notice containing the following:

(a) EPA hazardous waste number? [3745-59-07(B)(4)(a); 40 CFR 268.7(b)(4)(i)]

(b) The corresponding treatment standards and applicable prohibitions for each waste? [3745-59-07(B)(4)(b); 40 CFR 268.7(b)(4)(ii)]

(c) The manifest number associated with the shipment of waste? [3745-59-07(B)(4)(c); 40 CFR 268.7(b)(4)(iii)]

(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(B)(4)(d); 40 CFR 268.7(b)(4)(iv)]

5. Does the facility have any wastes and/or treatment residues shipped off-site for disposal which have been generated from treatment of a restricted waste to meet treatment standards? If so, N/A

For wastes and/or treatment residues generated from the treatment of a waste which has a concentration based treatment standard:

(a) Does the treatment facility also submit a written certification with each shipment of waste or treatment residue stating that the waste has been treated in compliance with applicable treatment standards? [O.A.C. Rule 3745-59-07(B)(5); 40 CFR 268.7(b)(5)]

(b) Does the certification contain the language as required by O.A.C. Rule 3745-59-07(B)(5)(a) (40 CFR 268.7(b)(5)(i))?

For wastes and/or treatment residues generated from the treatment of a waste which has a technology based treatment standard:

(c) With each shipment of treatment residue shipped off-site for disposal, does the treatment facility submit a certification stating that the waste has been treated in accordance with the appropriate treatment technology as specified in O.A.C. Rule 3745-59-42 (40 CFR 268.42)? [O.A.C. Rule 3745-59-07(B)(5); 40 CFR 268.7(b)(5)]

Y/N/NA RMK#

(d) Is the certification signed by an authorized representative and does it contain the language as specified in O.A.C. Rule 3745-59-07(B)(5)(b) (40 CFR 268.7(b)(5)(ii)? N/A

6. Does the treatment facility have wastes shipped off-site that do not meet treatment standards and/or wastes that must be further managed at a different treatment or storage facility? If so, N/A

(a) Is the facility complying with the generator notification requirements? [O.A.C. Rule 3745-59-07(B)(6); 40 CFR 268.7(b)(6)]

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

7. Does the facility treat characteristic hazardous waste(s) to render such waste(s) non-hazardous? N

(a) If so, are treated waste(s) sent to a licensed solid waste disposal facility?

i. If so, with each shipment of waste, does the generator submit a notification/certification to the Regional Administrator/Director which contains the following:

a. Name and address of the facility receiving the waste? [O.A.C. Rule 3745-59-09(D)(1)(a); 40 CFR 268.9(d)(1)(i)]

b. A description of the waste as initially generated, including EPA hazardous waste numbers and treatability group? [O.A.C. Rule 3745-59-09(D)(1)(b); 40 CFR 268.9(d)(1)(ii)]

c. The treatment standards applicable to the waste at the initial point of generation? [O.A.C. Rule 3745-59-09(D)(1)(c); 40 CFR 268.9(d)(1)(iii)]

ii. Is the certification signed by an authorized representative and does it contain the language in O.A.C. Rule 3745-59-07(B)(5)(a) (40 CFR 268.7(b)(5)(i)? [O.A.C. Rule 3745-59-09(D)(2); 40 CFR 268.9(d)(2)]

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

LDR - LAND DISPOSAL FACILITY REQUIREMENTS

	Y/N/NA	RMK#
1. Does the land disposal facility retain copies of LDR notices and certifications? [O.A.C. Rule 3745-59-07(C)(1); 40 CFR 268.7(c)(1)]	N/A	
2. Does the land disposal facility test the waste or an extract of the waste or treatment residue received in accordance with the the facility's waste analysis plan to ensure compliance with applicable LDR treatment standards, including: [O.A.C. Rule 3745-59-07(C)(2); 40 CFR 268.7(c)(2)]		
(a) Conducting the TCLP to test waste/residues which have a CCWE concentration based treatment standard? [O.A.C. Rule 3745-59-07(C)(2); 40 CFR 268.7(c)(2)]		
(b) Conducting a total constituent analysis to test waste/residues which have a CCW concentration based treatment standard? [O.A.C. Rule 3745-59-07(C)(2); 40 CFR 268.7(c)(2)]		
(c) Is testing specified in 2(a) and 2(b) conducted in accordance with the frequency set forth in the facility's waste analysis plan? [O.A.C. Rule 3745-59-07(C)(2); 40 CFR 268.7(c)(2)]		

NOTE: Analytical testing of residues which have been generated from treatment of a waste which has a technology based treatment standard only is not required.

3. Where applicable, does the land disposal facility ensure that only restricted wastes/residues which meet applicable concentration based treatment standards of O.A.C. rules 3745-59-41 or 3745-59-43 (268.41 or 268.43) are disposed of? [O.A.C. Rule 3745-59-40(A),(C); 40 CFR 268.40(a),(c)]		
4. Where applicable, does the land disposal facility ensure that only restricted wastes/residues which have been treated using the specified technology of O.A.C. Rule 3745-59-42 (40 CFR 268.42) are disposed of? [O.A.C. Rule 3745-59-40(B); 40 CFR 268.40(b)]		

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

TREATMENT OF LDR WASTES IN SURFACE IMPOUNDMENTS

	Y/N/NA	RMK#
1. Does the owner/operator treat wastes which are prohibited from land disposal in a surface impoundment or series of impoundments? If so, are the following conditions met:	N/A	
(a) The residues from treatment are analyzed to determine if they meet applicable treatment standards? [O.A.C. Rule 3745-59-04(A)(2)(a); 40 CFR 268.4(a)(2)(i)]		
(b) The sampling method is designed so that representative samples of the sludge and the supernatant are tested separately rather than mixed to form homogeneous samples? [O.A.C. Rule 3745-59-04(A)(2)(a); 40 CFR 268.4(a)(2)(i)]		
(c) Treatment residues (including any liquid waste) which do not meet treatment standards or prohibition levels are removed from the impoundment at least annually? [O.A.C. Rule 3745-59-04(A)(2)(b); 40 CFR 268.4(a)(2)(ii)]		
i. Such residues are not placed in any other surface impoundment? [O.A.C. Rule 3745-59-04(A)(2)(c); 40 CFR 268.7(a)(2)(iii)]		
(d) Procedures and schedules for sampling the impoundment contents, analysis of test data and removal of residues which do not meet treatment standards have been established? [O.A.C. Rule 3745-59-04(A)(2)(d); 40 CFR 268.4(a)(2)(iv)]		
i. Such procedures and schedules are specified in the facility's waste analysis plan as required by O.A.C. Rule 3745-65-13 (265.13)? [O.A.C. Rule 3745-59-04(A)(2)(d); 40 CFR 268.4(a)(2)(iv)]		
ii. A copy of the waste analysis plan has been submitted to the Director? [O.A.C. Rule 3745-59-04(A)(4); 40 CFR 268.4(a)(4)]		
(e) The impoundment meets the design requirements of O.A.C. Rule 3745-56-21(C) (40 CFR 264.221(c)) or 3745-67-21(A) (40 CFR 265.221(a))? [O.A.C. Rule 3745-59-04(A)(3); 40 CFR 268.4(a)(3)]		
(f) The impoundment meets groundwater monitoring requirements (unless exempt from such requirements)? [O.A.C. Rule 3745-59-04(A)(3); 40 CFR 268.4(a)(3)]		

Y/N/NA RMK#

(g) The owner/operator has submitted a written certification to the Director which states that the surface impoundment meets the above requirements referenced in Questions 1(a) through (f)? [O.A.C. Rule 3745-59-04(A)(4); 40 CFR 268.4(a)(4)] N/A

NOTE: Please see the waste analysis/waste analysis plan portion of the CEI checklist for additional questions regarding LDR requirements.

REMARKS

STORAGE OF LAND DISPOSAL RESTRICTED WASTES

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

NOTE: The LDR storage prohibition does not apply to wastes which are subject to a national capacity variance, variance from the treatment standard or case-by-case extension during the period of extension/variance. The LDR storage prohibition also does not apply to wastes subject to a no-migration petition or to wastes which meet treatment standards. [O.A.C. Rule 3745-59-50(E); 40 CFR 268.50(e)]

	Y/N/NA	RMK#
1. Is the owner/operator storing land disposal restricted wastes in containers? If so, is each container marked with the following information in accordance with O.A.C. Rule 3745-59-50(A)(2)(a) (40 CFR 268.50(a)(2)(i)):	N/A	
(a) The identification of the contents?		
(b) The date which accumulation began?		
2. Is the owner/operator storing land disposal restricted wastes in tanks? If so, is each tank marked with the following information in accordance with O.A.C. Rule 3745-59-50(A)(2)(b) (40 CFR 268.50(a)(2)(ii)):		
(a) A description of its contents?		
(b) The quantity of each hazardous waste received?		
(c) The date each period of accumulation begins? or;		
(d) Is the information required by 2(a), 2(b) and 2(c) being recorded and maintained in the facility's operating record? [O.A.C. Rule 3745-59-50(A)(2)(b); 40 CFR 268.50(a)(2)(ii)]		
3. Are land disposal restricted wastes being stored at the facility for greater than one year? If so,		
(a) Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [O.A.C. Rule 3745-59-50(A)(1); 40 CFR 268.50(a)(1)]		

NOTE: A TSD facility may store Land Disposal Restricted wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [O.A.C. Rule 3745-59-50(B)] During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.

The requirements of O.A.C. Rule 3745-59-50(C) (40 CFR 268.50(c)) found in Question #3 do not apply to those facilities that store hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm. Please go to Question #4 for applicable requirements.

	Y/N/NA	RMK#
4. Does the owner/operator store liquid hazardous wastes which also contain PCBs at concentrations greater than or equal to 50 ppm for greater than 90 days (180/270 days if SQG)? If so,	N/A	
(a) Does the facility remove from storage and treat or dispose of such PCB hazardous wastes within one year from the date that the wastes were initially placed in storage? [O.A.C. Rule 3745-59-50(F); 40 CFR 268.50(f)]		

NOTE: In addition to complying with the requirement found in Question 4(a), the facility must also meet the requirements of 40 CFR 761.65(b). [O.A.C. Rule 3745-59-50(F); 40 CFR 268.50(f)]

REMARKS

CONTINGENCY PLAN (OAC 3745-65-50 THROUGH 3745-65-56) Y/N/NA PMK #

1. Does the o/o have a written contingency plan which contains the following [3745-65-52(A)(B)(C)(D)(E)]:

   a. Actions to be taken by personnel in the event of an emergency? Y

   b. Arrangements or agreements with local or state emergency authorities? Y

   c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? Y

   d. A list of all emergency equipment including location, physical description and outline of capabilities? Y

   e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)]? Y

2. Is the contingency plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51(A)] Y

3. Is a copy of the contingency plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in execution of the plan? [3745-65-53(A)(B)] Y

4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] Y

5. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the contingency plan designated at all times (on-site or on-call)? [3745-65-55] N — Doug Mizbey & Rudy Zupan need training

6. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the contingency plan and taken all of the actions and made all of the notifications necessary under 3745-65-56(A-J)? Y

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)	Y/N/NA	RMK #
1. Is the facility operated to minimize the possibilty of fire, explosion, or non-planned release of hazardous waste? [3745-65-31]	Y	
2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection?	N	
a. If yes, was the contingency plan implemented? [3745-65-51(B)]		
3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)]		
a. Internal alarm system?	Y	
b. Access to telephone, radio or other device for summoning emergency assistance?	Y	
c. Portable fire control equipment, spill control and decontamination equipment?	Y	
d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	Y	
4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33(A)]	N	some inspection forms were not completed
a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, observations made, and date and nature of any repairs?	N	
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device? [3745-65-34]	Y	
6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35]	Y	
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)]	Y	

Y/N/NA RMK #

8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented? [OAC 3745-65-37(B)] N

REMARKS - CONTINGENCY PLAN/PREPAREDNESS AND PREVENTION REQUIREMENTS

SECURITY REQUIREMENTS (OAC 3745-65-14) Y/N/NA RMK #

1. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)] N/A

   b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] N/A

IF BOTH 1A AND 1B ARE NO, MARK QUESTIONS 2 AND 3 NOT APPLICABLE.

2. Does the facility have -

   a. A 24-hour surveillance system, or; Y

   b. An artificial or natural barrier <u>and</u> a means to control entry at all times? [3745-65-14(B)(2)(a)(b)] Y

3. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary? [3745-65-14(C)] Y

REMARKS - SECURITY REQUIREMENTS

USE AND MANAGEMENT OF CONTAINERS (OAC 3745-66-70 TO 3745-66-77) Y/N/NA RMK #

1. Are hazardous wastes stored in containers which are:

   a. Closed? [3745-66-73(A)] Y

   b. In good condition? [3745-66-71]

   c. Compatible with wastes stored in them? [3745-66-72] Y

2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] Y

3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] Y

4. Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] N some inspection were not complete

5. Is the facility recording inspections described in Question #4 in an inspection log or inspection summary as required by OAC 3745-66-74(B) which contains the following information:

   a. Date and time of inspections? Y

   b. Name of inspector? Y

   c. Notation of observations made during the inspection? Y

   d. The date and nature of any repairs or other remedial action? Y

6. Are ignitable and/or reactive hazardous waste(s) being managed at the facility? If so, N

   a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]

NOTE: OAC Rule 3745-66-76 as referenced in Question 6.a. does not apply to Small Quantity Generators (except for wastes accumulated in a satellite accumulation area). [See OAC Rules 3745-52-34(D)(2) and (C)(1)(a)]

   b. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)]

OAC 3745-66 CLOSURE AND POST CLOSURE

	Y/N/NA	RMK #
1. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12]?	Y	Currently being revised by Master Metals, Inc.
a. A description of how each hazardous waste management unit will be closed in accordance with 3745-66-11?		
b. A description of how final closure will meet the requirements of 3745-66-11?		
c. An estimate of the maximum amount of hazardous waste ever in inventory?		
d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues?		
e. The year closure is expected to begin and a schedule for the various phases of closure?		
f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control?		
2. Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)]		
3. Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director 180 days prior to beginning the closure process? [3745-66-12(D)]		
4. Has the closure plan (and post-closure plan, if applicable) for any non land disposal unit(s) been submitted to the Director 45 days prior to beginning the closure process? [3745-66-12(D)]		
5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)]		
6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)]		
7. Did the owner/operator submit to the Director, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15]		

	Y/N/NA	RMK #
8. Did the owner/operator submit to the local zoning authority and the Director a survey plat in accord- and with OAC 3745-66-16?	____	____
9. What permitted units at the facility have been closed in accordance with an approved closure plan?		
_____		
_____		
10. If closure was partial, list the regulated units which remain in use at the faciilty:		
_____		
_____		
11. If required, has the facility prepared a written post-closure plan? [3745-66-18]	____	____
If so, does the post-closure plan include:		
a. A description of proposed ground water monitoring?	____	____
b. A description of planned maintenance activities?	____	____
c. The name, address and phone number of person/office to contact during the post-closure period?	____	____
12. For disposal facilities; has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19]	____	____
13. Has the owner of the property on which a disposal unit is located recorded on the deed that:		
a. The land has been used to manage hazardous waste and the type, quantity and location of waste?	____	____
b. Land use is restricted under closure and post-closure rules? [3745-66-19]	____	____

REMARKS - CLOSURE/POST CLOSURE REQUIREMENTS

RCRA HAZARDOUS WASTE FACILITY
COMPLIANCE EVALUATION INSPECTION CHECKLIST

Facility: MASTER METALS

USEPA I.D.: OHD 097 613 871 HWFB No.: _____

Street: 2350 WEST 3rd ST.

City: CLEVELAND State: OH Zip: 44113

County: CUYAHOGA Telphone: (216) 621-2361

PUCO No.: _____

Owner/Operator: same

Street: _____

City: _____ State: _____ Zip: _____

Telephone: _____

Inspection Date: 8/9/91 8/12/91 8/16/91 Time: 1:30 - 3:30 11:30 - 12:30 9:00 - 4:00

Advance notice of inspection given? (yes) ____ (no) ✓
If so, how far in advance? _____

	Name	Agency/Title	Phone
Inspectors:	LINDA LAGUNZAD	OHIO EPA	
	SHERRY SLONE	"	(216) 425-9171
	PAUL DOLENSKY	"	
	KRIS SWITZER	"	
	TOM ROTH	"	
Facility Representative:	DOUG MICKEY	MASTER METALS	(216) 621-2361
	MIKE CYPHERT	"	"
	RUDY ZUPAN	"	
	TOM HELMS		
	JIM AMMONS	STATUS	"

Cond. Ex. SQG___ SQG___ Large Quantity Generator ✓
Treatment___ Storage___ Disposal___ Transporter___

Part A Permit: (yes) ✓ (no) ___ Part B Permit: (yes) ___ (no) ✓
LDR Checklisc Attached: (yes) ✓ (no) ___

ACTIVITIES

Containers ✓
Tanks ✓
Wastepile ✓
Landfill___
Surface Impoundment___

Used oil burner___
Hazardous waste fuel burner/blender___
Incineration/Thermal treatment___
Land treatment___
Groundwater monitoring___

Revised: 1/7/91

FACILITY INSPECTION
WASTE MANAGEMENT ACTIVITIES SUMMARY

DESCRIPTION OF WASTE			ON SITE MANAGEMENT											OFF SITE MANAGEMENT	
EPA WASTE CODE	QTY GEN PER MO.	PROCESS/ACTIVITY GENERATING WASTE	GENERATOR: LESS THAN 90 DAYS	GENERATOR: LESS THAN 180 DAYS	GENERATOR: LESS THAN 270 DAYS	TSD	TYPE OF ON-SITE TREATMENT (WHERE APPLICABLE)	RECYCLER	CONTAINER	IMPOUNDMENT	TANK	WASTE PILE	LANDFILL	DESCRIPTION OF OFF SITE MANAGEMENT	DISPOSAL FACILITY
K069		receives Baghouse flue dust from off-site secondary Pb smelters				✓	reclamation		✓						
K069		Secondary lead flue dust generated on-site.				✓	reclamation		✓						
D008		Mixture of Pb dross, industrial batteries, scrap + other residues				✓	reclamation		✓						
D002		generate sulfuric acid <90 day storage (from batteries)	✓				none				✓				Clean Harbors

REMARKS - GENERAL INFORMATION

Include list of wastes being managed at the site and a brief description of site activity and waste handing procedures:

THIS FACILITY IS A SECONDARY LEAD SMELTING FACILITY. IT RECLAIMS LEAD WITH TWO ROTARY FURNACES. IT ACCEPTS FROM OFF-SITE LEAD DROSS, INDUSTRIAL BATTERIES, SCRAP & OTHER RESIDUALS (D008), AS WELL AS LEAD BAGHOUSE DUST (K069). THE BATTERY SCRAP IS EXEMPT FROM MANIFESTING. OHIO PART B WAS SUBMITTED APRIL, 1990. THE FACILITY HAS AN ELEMENTARY NEUTRALIZATION OPERATION FOR THE BATTERY ACID TANK, WHICH IS ALSO EXEMPT.

DUE TO THE CRACKING OF BATTERIES IN THE BATTERY CRACKING AREA, D002 WASTE IS GENERATED. IT DRAINS TO A DRAIN -> SUMP -> PIPELINE -> UNDERGROUND STORAGE TANK. PERIODICALLY CLEAN HARBORS PUMPS OUT THIS LIQUID D002 + TAKES IT OFF-SITE. THE SLUDGE REMAINING IS PLACED INTO THE ON-SITE CHARGE BIN, PRIOR TO BURNING IN KILN.

ON:

1) 9/26/90: 1 TT (1700 gal) OF D002 shipped to Clean Harbors Manifest # 00100.

2) 11/1/90: 1 TT (323 gal) OF D002 shipped to Clean Harbors Manifest # 00101.

3) 5/7/91: 1 TT (4,400 gal) OF D002 shipped to Clean Harbors Manifest # 00102.

PERMIT STATUS

	Y/N/NA	RMK#
1. Has the facility submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?	Y	
When was the facility's Part A submitted: _____		
2. Is the facility operating in compliance with the terms conditions of its HWFB permit?	NA	
If not, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51?	NA	
If yes, what date was the PCR submitted? _____		
3. Has the facility submitted a Part B?	Y	4/9/90

REMARKS - PERMIT STATUS

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS

IDENTIFICATION NUMBER (OAC 3745-65-11)	Y/N/NA	RMK #
1. Has the facility owner/operator notified U.S. EPA of hazardous waste activity and obtained a U.S. EPA identification number [OAC 3745-65-11]?	Y	
ANNUAL REPORT REQUIREMENT (OAC 3745-65-75)		
2. Has the owner/operator submitted an annual Treatment-Storage-Disposal Operating Report to the Director of the Ohio EPA by March 1st of each calendar year? [3745-65-75]	Y	
WASTE ANALYSIS/WASTE ANALYSIS PLAN (OAC 3745-65-13)		
3. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat, store or dispose of the waste as required by 3745-65-13(A)(1)?	N	
4. Is the waste analysis repeated when a process or operation generating hazardous waste changes? [3745-65-13(A)(3)(a)]	N	this is not addressed in WA Plan
5. For off-site facilities; Is the waste analysis repeated when results of inspections under 3745-65-13(A)(4) reveal hazardous waste received at the facility does not match the waste designated on the accompanying manifest? [3745-65-13(A)(3)(b)]	Y	
6. Does o/o have a written waste analysis plan which includes the following information [OAC 3745-65-13(B)(1) through (6)]:		
a. The parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters? [3745-65-13(B)(1)	N	totally missing from WA Plan
b. The test methods to be used? [3745-65-13(B)(2]	N	none for pH
c. The sampling method which will be used, either one of the sampling methods described in Appendix I of 3745-51-20 or an equivalent method as defined in OAC 3745-50-10? [3745-65-13(B)(3)(a)(b)]	N	totally missing from WA Plan
d. The frequency with which the initial analysis of the waste will be reviewed/repeated to ensure that the analysis is accurate and up-to-date? [3745-65-13(B)(4)]	Y	

	Y/N/NA	RMK #
e. **FOR OFF-SITE FACILITIES:** The waste analysis that hazardous waste generators have agreed to supply? [3745-65-13(B)(5)]	N	totally missing from WA Plan
f. **FOR OFF-SITE FACILITIES:** The sampling methods and procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identification of the waste on the manifest [3745-65-13(C)]?	N	does not include description of new tracking system
g. **FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER 3745-59-04(A):**	N/A	
Does the waste analysis plan include procedures and schedules for:		
i. The sampling of impoundment contents? [3745-65-13(B)(7)]		
ii. The analysis of test data? [3745-65-13(B)(7)]		
iii. The annual removal of residues which are not delisted or which exhibit the characteristic of a hazardous waste and either do not meet treatment standards (3745-59-44) or where no treatment standards have been established? [3745-65-13-(7)		
h. **Where applicable:** The methods which will be used to meet the additional waste analysis requirements of rules 3745-59-07, 3745-67-25, 3745-67-52, 3745-67-73, 3745-68-14, 3745-68-41, 3745-68-75 and 3745-69-02 of the OAC? [3745-65-13(B)(6)]		

REMARKS - **WASTE ANALYSIS REQUIREMENTS**

OPERATING RECORD REQUIREMENTS (OAC 3745-65-73) Y/N/NA RMK #

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) which contains the following information:

a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)]	N	- unlabeled drums - slag bin amts - charge bin amts
b. Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?	Y	
c. The estimated (or actual) weight, volume or density of the waste material?	Y	
d. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745?	Y	
e. The present physical location of each hazardous waste within the facility and cross references to specific manifest document numbers?	N	not for charge bin
f. Records of incidents which required implementation of the Contingency Plan?	NA	
g. Records of any waste analyses and trial tests required to be performed?	Y	
h. Records of the inspections required under the General Inspection Requirements under 3745-65-15?	Y	
i. Records of any monitoring, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6)?	Y	
j. FOR DISPOSAL FACILITIES, location and quantity of each hazardous waste recorded on a facility map and cross-references to manifest document numbers? [3745-65-73(B)(2)]	NA	
k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required by OAC 3745-66?	↓	

NOTE: THE FOLLOWING RECORDKEEPING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.

	Y/N/NA	RMK #
2. Are manifests received by the facility signed and dated? [3745-65-71(A)(1)]	Y	
3. Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)]	Y	
a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)]?	NA	
b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) noted in writing on the manifest document?	Y	
4. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) or has the o/o submitted the required information to the Director?	NA	
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) been submitted to the Director within 15 days?	NA	

REMARKS - OPERATING RECORD REQUIREMENTS

GENERAL INSPECTION REQUIREMENTS (OAC 3745-65-15) Y/N/NA RMK #

1. Does the o/o inspect the facility on a weekly basis for malfunctions, deterioration, operator errors and discharges which may cause a release of hazardous waste or hazardous waste constituents or may pose a threat to human health? [3745-65-15(A)(1)(2)] If so, Y

   a. Are the inspections recorded in an inspection log or summary as required by 3745-65-15(D)? [3745-65-15(A)] Y
   b. Do records contain date and time of inspection, name of inspector, notation of observations made and date and nature of any repairs or remedial actions as required by 3745-65-15(D)? [3745-65-15(A)] N battery cracking pad
   c. Are inspection records maintained at the facility for at least (3) years as required by 3745-65-15(D)? [3745-65-15(A)] Y

2. Has the owner/operator developed a written inspection schedule for inspecting; monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment (e.g. dikes, sumps)? [3745-65-15(B)] If so, N not for emergency equipment

   a. Is the schedule kept at the facility? [3745-65-15(B)(2)] Y
   b. Does the schedule identify the types of problems which are to be looked for during the inspection? [3745-65-15(B)(3)] N
   c. Does the schedule include inspection of areas subject to spills (i.e. loading and unloading areas) daily when in use and according to other applicable regulations when not in use? [3745-65-16(B)(4)] N -not of sump area in battery cracking area -not for all unloading/loading areas

REMARKS - GENERAL INSPECTION REQUIREMENTS

PERSONNEL TRAINING (OAC 3745-65-16) Y/N/NA RMK #

1. Does the facility provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan?	N	fails to provide description of such Program
2. Does the facility provide Personnel Training to new employees within 6 months after the date of their employment as required by 3745-65-16(B)?	Y	
3. Does the facility provide an annual training program refresher course as required by 3745-65-16(B)?	Y	*
4. Does the facility keep all of the records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records?	N	not for job descriptions

REMARKS - PERSONNEL TRAINING

* MM is due for annual training in September 1991.

CONTINGENCY PLAN (OAC 3745-65-50 THROUGH 3745-65-56) Y/N/NA RMK #

1. Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components: [3745-65-52(A)(B)(C)(D)(E)]

   a. Actions to be taken by personnel in the event of an emergency? Y *

   b. Arrangements or agreements with local or state emergency authorities? Y

   c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? Y

   d. A list of all emergency equipment including location, physical description and outline of capabilities? Y

   e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)]? Y

2. Is the Contingency Plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51(A)] Y

3. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has the plan been submitted to all local and state emergency authorities that might be required to participate in execution of the plan? [3745-65-53(A)(B)] N 11-27-90 Plan not sent to OEPA until OEPA requested for it during inspection

4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] Y

5. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-55] N Doug Mickey not familiar w/plan or facility operations

* NOV. 27, 1990 REVISED CONTINGENCY PLAN REC'D BY THE AGENCY ON AUG. 28, 1991 WAS REVIEWED FOR COMPLIANCE WITH THE REQUIREMENTS OF THIS SECTION.

	Y/N/NA	REMARK #
ergency situation has occurred, has the emergency tor implemented all or part of the Contingency taken all of the actions and made all of the tions necessary under 3745-65-56(A-J)?	NA	

TINGENCY PLAN REQUIREMENTS

SECURITY REQUIREMENTS (OAC 3745-65-14) Y/N/NA RMK #

1. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)] Y

   b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] Y

IF BOTH 1A AND 1B ARE NO, MARK QUESTIONS 2 AND 3 NOT APPLICABLE.

2. Does the facility have -

   a. A 24-hour surveillance system, or; N

   b. An artificial or natural barrier <u>and</u> a means to control entry at all times? [3745-65-14(B)(2)(a)(b)] Y

3. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary? [3745-65-14(C)] N missing along Southern fence

REMARKS - SECURITY REQUIREMENTS

SPECIAL REQUIREMENTS FOR IGNITABLE/REACTIVE/INCOMPATIBLE WASTES (OAC 3745-65-17)	Y/N/NA	RMK #
1. If ignitable, reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17]		
a. Wastes are protected from sources of ignition and/or reaction?	NA	
b. Physical separation of incompatible waste materials?		
c. "No Smoking" or "No Open Flames" signs are placed near areas where ignitable or reactive wastes are handled?		
d. Commingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B)?		

REMARKS - IGNITABLE/REACTIVE/INCOMPATIBLE WASTE REQUIREMENTS

OAC 3745-66 CLOSURE AND POST CLOSURE

	Y/N/NA	RMK #
1. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12]?	Y	
a. A description of how each hazardous waste management unit will be closed in accordance with 3745-66-11?	Y	
b. A description of how final closure will meet the requirements of 3745-66-11?	Y	
c. An estimate of the maximum amount of hazardous waste ever in inventory?	Y	
d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues?	Y	
e. The year closure is expected to begin and a schedule for the various phases of closure?	Y	
f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control?	Y	
2. Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)]	Y	
3. Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director 180 days prior to beginning the closure process? [3745-66-12(D)]	Y	
4. Has the closure plan (and post-closure plan, if applicable) for tank, container storage or incinerator units been submitted to the Director 45 days prior to beginning the closure process? [3745-66-12(D)]	NA	
5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)]	NA	
6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)]	NA	
7. Did the owner/operator submit to the Director, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15]	NA	

	Y/N/NA	RMK #
8. Did the owner/operator submit to the local zoning authority and the Director a survey plat in accordance with OAC 3745-66-16?	Y	
9. What permitted units at the facility have been closed in accordance with an approved Closure Plan?		

NA - Master Metals has yet to implement closure of the waste piles

10. If closure was partial, list the regulated units which remain in use at the faciilty:

_____

_____

11. If required, has the facility prepared a written post-closure plan? [3745-66-18]	NA	
If so, does the post-closure plan include:		
a. A description of proposed ground water monitoring?		
b. A description of planned maintenance activities?		
c. The name, address and phone number of person/office to contact during the post-closure period?		
12. For **disposal facilities**; has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19]	NA	
13. Has the owner of the property <u>on which a disposal unit is located</u> recorded on the deed that:		
a. The land has been used to manage hazardous waste and the type, quantity and location of waste?		
b. Land use is restricted under closure and post-closure rules? [3745-66-19]		

REMARKS - CLOSURE/POST CLOSURE REQUIREMENTS

OAC 3745-58-70 SPENT LEAD ACID BATTERIES BEING RECLAIMED

	Y/N/NA	RMK #
1. Does the facility reclaim spent batteries and store them before reclaiming them?	Y	
a. If so, has the facility notified USEPA under Section 3010 of RCRA?	Y	

Note: In addition to the above, the facility is subject to the applicable provisions of Chapters 3745-55 and 3745-66, Rules 3745-56-20 to 3745-56-59 and 3745-67-20 to 3745-57-57, all provisions of Chapters 3745-54 and 3745-65 except Rules 3745-54-13 and 3745-65-13, 3745-54-71 and 3745-65-71 and 3745-54-72 and 3745-65-72, and all applicable provisions of Rule 3745-50-44. [3745-58-70(B)] Please complete the appropriate checklists to document compliance with these requirements.

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)	Y/N/NA	RMK #
1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31]	N	Bin doors open, tarps not secure
2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection?	N	
a. If yes, was the contingency plan implemented? [3745-65-51(B)]	NA	
3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)]		
a. Internal alarm system?	Y	
b. Access to telephone, radio or other device for summoning emergency assistance?	Y	
c. Portable fire control equipment, spill control and decontamination equipment?	Y	
d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	Y	
4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33]	N	
a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, observations made, and date and nature of any repairs?	N	facility does not have equipment log
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34]	Y	
6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35]	N	in drum storage area.
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)]	Y	

USE AND MANAGEMENT OF CONTAINERS (OAC 3745-66-70 TO 3745-66-77)	Y/N/NA	RMK #
1. Are hazardous wastes stored in containers which are:		
a. Closed? [3745-66-73(A)]	N	drums with ripped plastic covers
b. In good condition? [3745-66-71]	Y	
c. Compatible with wastes stored in them? [3745-66-72]	Y	
2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)]	N	drums with ripped plastic covers
3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)]	N	drums with ripped plastic covers
4. Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74]	Y	
5. Is the facility recording inspections described in Question #4 in an inspection log or inspection summary as required by OAC 3745-66-74(B) which contains the following information:		
a. Date and time of inspections?	Y	
b. Name of inspector?	Y	
c. Notation of observations made during the inspection?	Y	
d. The date and nature of any repairs or other remedial action?	Y	
6. Are ignitable and/or reactive hazardous waste(s) being managed at the facility? If so,	NA	
a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]		
b. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)]		

REMARKS - CONTAINER MANAGEMENT REQUIREMENTS

SATELLITE ACCUMULATION AREA REQUIREMENTS **Y/N/NA RMK #**
(OAC 3745-52-34(C))

1. Has the facility elected to accumulate hazardous waste at or near a point of generation which is under the control of the operator of the process generating the waste? (defined as satellite accumulation) Y

   If so, are the following requirements of OAC 3745-52-34(C) being met:

   a. Quantities of waste accumulated do not exceed 55 gallons at any time? N*
   b. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time? NA
   c. The generator has marked the containers with words "Hazardous Waste" or with other words identifying the contents of the container? N*

If the facility is maintaining satellite accumulation areas as identified in 1.a. and 1.b. above, OAC 3745-52-34(C) also requires that the container(s) in these areas be managed in compliance with the "Container Management" requirements of OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76 and 3745-66-77. Please complete the **Use and Management of Containers** checklist to document compliance with these requirements.

2. Is the facility accumulating hazardous waste(s) in excess of the amounts listed in either 1.a or 1.b? Y

   a. If so, did the generator comply with 3745-52-34(A) within three (3) days? **and;** NA

   b. Upon accumulating > 55-gallons of waste, did the generator mark the container holding the excess hazardous waste with the date the excess began accumulating? ↓

REMARKS - SATELLITE ACCUMULATION REQUIREMENTS

* At the time of the inspection large bags or "superbags" were used to collect flue dust from the Master Metals' baghouses. These bags can hold well over 55 gal of material. The bag that was presently holding flue dust was at a total accumulation of < 55 gal. It was not labeled in any way.

GENERATOR ACCUMULATION IN CONTAINERS AND TANKS (OAC 3745-52-34) — Y/N/NA — RMK #

1. If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a permit as provided under 3745-52-34, are the following requirements met:

   a. The containers or tanks are clearly marked with the words "Hazardous Waste"? [OAC 3745-52-34(A)(3)] — N
   b. The date that accumulation began is clearly marked on each container? [OAC 3745-52-34(A)(2)] — NA

In addition, OAC 3745-52-34(A)(1) also requires generators accumulating hazardous waste(s) in containers < 90 days to comply with the "Container Management" Rules of OAC 3745-66-70 to 3745-66-77. If the generator is accumulating hazardous waste(s) in containers, please complete **Management of Containers** checklist to document compliance with these requirements.

2. Is the generator accumulating hazardous waste(s) in tanks? — Y

   If so, OAC 3745-52-34(A)(1) requires generators to comply with Rules 3745-66-90 to 3745-66-992 except Paragraph (c) of rule 3745-66-97 and rule 3745-66-991.

   If the generator is accumulating hazardous waste(s) in tanks, complete the Storage and Treatment in Tanks checklist to document compliance with these requirements.

3. Has the generator accumulated hazardous wastes in excess of ninety (90) days?

   a. If so, has the generator been granted an extension by the Director for accumulation in excess of (90) days?

   *

REMARKS - GENERATOR ACCUMULATION REQUIREMENTS

* UNABLE TO DETERMINE SINCE MM DOES NOT PERFORM DAILY INSPECTIONS OR KNOW THE AGE OF THE TANK OR RECORD ACCUMULATION LEVELS.

STORAGE AND TREATMENT IN TANKS (OAC 3745-66-91 TO 3745-66-991)

NOTE: Tanks used to store or treat wastes containing no free liquids (as determined by the Paint Filter Liquid Test) that are located inside a building with an impermeable floor are exempt from secondary containment requirements of 3745-66-93. Tank systems including sumps that serve as part of a secondary containment system are also exempt from 3745-66-93.

For generators who store wastes in tanks for less than 90 days use all items except 24. Compliance with the closure requirement of 3745-66-97(C) and the waste analysis requirement of 3745-66-991 is not required.

NEW TANK SYSTEM - Installation commencing after July 14, 1986.
EXISTING TANK SYSTEM - Installation or operation commencing on or before July 14, 1986.

	Y/N/NA	RMK #
1. Is the generator operating any of the following classifications of tank systems for the management of hazardous waste(s):		
a. **New tank system(s)**? If so,	N	
Did the o/o install secondary containment meeting the requirements of 3745-66-93 for the unit(s) prior to putting each into service? [3745-66-93(A)(1)]	NA	
b. **Existing tank system(s)** used to manage: F020, F021, F022, F023, F026 or F027 hazardous wastes? If so,	N	
Did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the tank by January 12, 1989? [3745-66-93(A)(2)	NA	
c. **Existing tank system(s)** of known, documentable age?	N	

i. If so, has the tank reached 15 years of age?
(yes) _____ (no) _____

If the answer to 1.c.i. above is **no**, the tank is not required to have secondary containment until the unit reaches 15 years of age.

If the answer to 1.c.i. above is **no**, when is the unit required to have secondary containment?

_____

If the answer to 1.c.i. above is **yes**, did the o/o provide secondary containment for the unit when it reached 15 years of age or; by January 12, 1989 (whichever came later)? [3745-66-93(A)(3)]	NA	

	Y/N/NA	RMK #
d. **Existing tank system(s)** for which the age cannot be documented? If so,	Y	RUDY ZUPAN COULD NOT provide document-ation of age of UST at battery crack area.

i. Is the facility greater than 7 years of age?
(yes) ✓ (no) ____

If the facility is < 7 years of age, secondary containment for the tank is not required until January 12, 1995.

ii. If the facility is > 7 years of age, is the facility also > 15 years of age?

(yes) ✓ (no) ____

If the answer to 1.d.ii above is no, the o/o is not required to provide secondary containment for the tank until the facility reaches 15 years of age.

If the answer to 1.d.ii above is no, when is the secondary containment required for the tank(s)?

_____

If the answer to 1.d.ii. above is **yes**, did the o/o provide secondary containment for the tank when the facility reached 15 years of age or; by January 12, 1989 (whichever came later)? [3745-66-93(A)(4)]	N	RUDY ZUPAN indicated UST had no 2° containment
2. Is the o/o operating a tank system which is used to manage a material that became a hazardous waste after January 12, 1987? If so,	N	
a. Has the o/o provided secondary containment meeting the requirements of 3745-66-93 for the unit as required in questions 1.a. through 1.d.? (NOTE: The date the material became a hazardous waste must be used in place of January 12, 1989) [3745-66-93(A)(5)	NA	
3. Has the owner/operator obtained a variance from secondary containment requirements of 3745-66-93 from Director in accordance with 3745-66-93(G)(1)?	N	

Note: **If the tank system has no secondary containment, or a variance from secondary containment requirements has been granted, skip to page 9 of this Tank Systems Checklist.**

	Y/N/NA	RMK #

4. Is the secondary containment provided for the tank system one of the following, as described in 3745-66-93:

a. **External Liner**? If so, — NA

1. Is the liner designed or operated to contain 100% of the capacity of the largest tank within its boundary? [3745-66-93(1)(a)] — NA

2. Is the liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? [3745-66-93(1)(b) — NA

3. Is the liner free of cracks and gaps? [3745-66-93(1)(c)] — NA

4. Does the liner completely surround the tank and cover all earth likely to be contacted by waste during a release? [3745-66-93(1)(d)] — NA

** Is the liner concrete? If so, — NA

5. Are chemically resistant water stops in place at all joints? — NA

6. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? — NA

** NOTE: Federal Register Preamble language (Sept. 2, 1988 FR pp. 34084) specifies that concrete liner systems must also be provided with with chemical resistant water stops and compatible interior coating.

b. **Vault System**? If so,

1. Is the vault system designed to contain 100% of the capacity of the largest tank within its boundary? [3745-66-93(2)(a)] — N — MM could not provide such data

2. Is the vault system designed and operated to prevent run-off and infiltration into the vault system, or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? [3745-66-93(2)(b)] — N — MM could not provide such data

3. Are chemically resistant water stops in place at all joints? [3745-66-93(2)(c)] — N — MM could not provide such data

	Y/N/NA	RMK #
4. Is there a compatible interior coating to prevent migration into the concrete? [3745-66-93(2)(d)]	N	Rudy Zupan indicated this was done, but could not provide documentation
5. If ignitable or reactive waste is being managed, is the vault system provided with a means to prevent against the formation or ignition of vapors? [3745-66-93(2)(e)]	N	
6. Is the vault system provided with an exterior moisture barrier? [3745-66-93(2)(f)]	N	MM could not provide data
c. **Doubled-Walled Tank**? If so,	NA	
1. Is the doubled-walled tank designed as an integral structure to contain any release from the inner tank? [3745-66-93(3)(a)]		
2. If metal, are the primary tank interior and outer shell exterior surfaces protected from corrosion? [3745-66-93(3)(b)]		
3. Is the double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time? [3745-66-93(c)]		
5. Is the secondary containment system for the tank(s) an equivalent device as described in 3745-66-93(D)(4) which has been approved by the Director? [3745-66-93(D)(E)]		

REMARKS - SECONDARY CONTAINMENT REQUIREMENTS

SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION (OAC 3745-66-93(B)(C))	Y/N/NA	RMK #
6. Has each secondary containment system been designed, installed and operated to prevent <u>any</u> migration of wastes or liquid to the soil, ground water, or surface water and is it capable of <u>detecting</u> and <u>collecting</u> releases and accumulated liquids? [3745-66-93(B)]	N	Rudy Zupan: UST does not have 2° containment
7. Does the secondary containment system meet the following minimum requirements of 3745-66-93(C):		
a. Is it constructed or lined with compatible materials of sufficient strength to prevent failure? [3745-66-93(C)(1)]	N	
b. Is it placed on a foundation or base capable of providing support? [3745-66-93(C)(2)]	N	
c. Is it provided with a leak detection system that is designed/operated to detect failure of primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time? [3745-66-93(C)(3)]	N	
d. Is it sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? [3745-66-93(C)(4)]	N	
e. Is any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner? [3745-66-93(C)(4)]	N	

REMARKS - SECONDARY CONTAINMENT REQUIREMENTS

ANCILLARY EQUIPMENT REQUIREMENTS (OAC 3745-66-93(F))	Y/N/NA	RMK #
8. Is tank system ancillary equipment provided with secondary containment such as double-walled piping, jacketing or trench? [3745-66-93(F)]	NA	
9. If the answer to #8 is NO, is ancillary equipment:		
a. Inspected daily? **AND;**	NA	
b. Is ancillary equipment one of the following;		
i. Above ground piping (exclusive of flanges, joints, valves and conntections)?	NA	
ii. Welded flanges, welded joints and/or welded connections?	NA	
iii. Sealless or magnetic coupling pumps and/or sealless valves?	NA	
iv. Pressurized above ground piping systems with automatic shut-off devices (e.g. excess flow check valves, flow metering shutdown devices, and.or loss of pressure-actuated shut-off devices)?	NA	

REMARKS - ANCILLARY EQUIPMENT REQUIREMENTS

NEW TANK SYSTEM REQUIREMENTS (OAC 3745-66-92)	Y/N/NA	RMK #
1. For new tank systems has the o/o obtained a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-66-92(A)]	NA	
Does the written assessment meet the following requirements of OAC 3745-66-92:		
a. Has the assessment been certified by an independent, registered, Professional Engineer? [3745-66-92(A)]		
b. Does the assessment include consideration of the design standards of the system? [3745-66-92(A)(1)]		
c. Does the assessment include consideration of the hazardous characteristics of the waste(s) to be handled? [3745-66-91(A)(2)]		
d. If the external system or components of the system are metal, does the assessment include a evaluation of the system by a corrosion expert to determine the potential of system corrosion? [3745-66-96(A)(3)]		
e. For underground tank components, does the written assessment include a determination of design and operational measures that will be needed to protect the tank system from potential damage? [3745-66-96(A)(4)]		
f. Does the assessment include design considerations to ensure that the tank foundations will maintain the load of a full tank? [3745-66-96(A)(5)(a)]		
g. For tanks situated in a seismic fault zone or saturated zone, does the assessment include design considerations for anchoring the unit to prevent floatation? [3745-66-96(A)(5)(b)]		
h. Does the assessment include design considerations to ensure that the tank system will withstand the effects of frost heave? [3745-66-96(A)(5)(c)]		

REMARKS - NEW TANK SYSTEM ASSESSMENT REQUIREMENTS

	Y/N/NA	RMK #
2. Does the o/o have on file at the facility, written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)]	NA	
Do the written statements address all of the following requirements of 3745-66-92(G):		
a. Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)]		
b. A statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)]?		
c. Proper backfilling? [3745-66-92(C)]		
d. Tightness test; if the tank was found not to be tight, does the statement indicate that proper repairs were made? [3745-66-92(D)]		
e. Proper support and protection of ancillary equipment? [3745-66-92(E)]		
f. Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)]		

REMARKS - NEW TANK SYSTEM REQUIREMENTS

TANK SYSTEMS WITHOUT SECONDARY CONTAINMENT (OAC 3745-66-91) Y/N/NA RMK #

1. For existing tank system, without secondary containment that meets 3745-66-93 standards, does the o/o have a written assessment of the tank system on file at the facility which meets all of the following requirements: [3745-66-91(A)(B)]

   a. Design standards have been considered? [3745-66-91(B)(1)] NA

   b. The characteristics of hazardous waste(s) that have been or will be handled have been considered? [3745-66-91(B)(2)]

   c. Corrosion protection measures have been considered? [3745-66-91)(B)(3)]

   d. The age of the tank system has been estimated or documented? [3745-66-91(B)(4)]

   e. A leak test for non-enterable underground tanks has been conducted? [3745-66-91(B)(5)(a)]

   f. A leak test or an internal inspection by qualified P.E. for other than non-enterable underground tanks has been conducted? [3745-66-91(B)(5)(b)]

   g. Is the assessment certified by an independent, registered, Professional Engineer? [3745-66-91(A)]

2. Have the tests specified in 1e and 1f been conducted annually until secondary containment is provided? [3745-66-93(I)(4)]

3. For tanks without secondary containment used to store or treat wastes which become hazardous wastes after July 14, 1986, has the o/o done the assessment within 12 months after the date the waste became a hazardous waste? [3745-66-91(C)]

REMARKS - TANK SYSTEMS WITHOUT SECONDARY CONTAINMENT

TANK SYSTEM - GENERAL OPERATING REQUIREMENTS	Y/N/NA	RMK #
1. Does the o/o follow the general operating requirements below: [3745-66-94]		
a. Does the o/o prevent the placement of hazardous waste or treatment reagents in the tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail? [3745-66-94(A)]	N	
b. Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, high level alarms)? [3745-66-94(1)(2)]	N	
c. Has the o/o complied with 3745-66-96 when a leak or spill has occurred? [3745-66-94(C)]	N	

TANK SYSTEM - INSPECTION REQUIREMENTS		
2. Has the o/o documented the inspections required in 3745-66-95, in the operating record of the facility, including inspection of the following:		
a. Spill control equipment (daily)? [3745-66-95(A)(1)]	N	
b. Above ground portion of tank (daily)? [3745-66-95(A)(2)]	N	
c. Data from leak detection equipment (daily)? [3745-66-95(A)(3)]	N	
d. Construction materials and area immediately surrounding the tank for signs of erosion of release of hazardous waste (daily)? [3745-66-95(A)(4)]	N	
e. The cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(B)(1)]	NA	
f. All sources of impressed current at least bi-monthly? [3745-66-95(B)(2)]	NA	

REMARKS - TANK SYSTEM GENERAL OPERATING AND INSPECTION REQUIREMENTS

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES **Y/N/NA RMK #**
(OAC 3745-66-98 AND 3745-66-99)

1. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with one of the following: [3745-66-98(A)]

   a. Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-65-17(B)? [3745-66-98(A)(1)] NA

   OR;

   b. Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A)(2)]

   OR;

   c. The tank is used solely for emergencies? [3745-66-97(A)(3)]

2. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA flammable or combustible code (1977 or 1981)? [3745-66-98(B)]

3. Has the o/o placed incompatible wastes or materials into the same tank system or into a tank system that has not been decontaminated and which previously held an incompatible waste or material [3745-66-99]?

   a. If so, have the requirements of 3745-65-17(B) been met?

REMARKS - IGNITABLE/INCOMPATIBLE WASTE REQUIREMENTS

TANK SYSTEM - WASTE ANALYSIS REQUIREMENTS (OAC 3745-66-991) | Y/N/NA | RMK #

1. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-991]

   a. Conducted waste analysis and trial treatment storage tests? [3745-66-991(A)] — NA

   OR;

   b. Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-991(B)] — NA

REMARKS - TANK SYSTEM WASTE ANALYSIS REQUIREMENTS

TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE
(OAC 3745-66-96)

	Y/N/NA	RMK #
1. Has the o/o found any tank system(s) to be leaking or unfit for use as a result of the above tests or daily inspections?	N *	
If so, did the owner/operator:		
a. Immediately ceased flow of material into tank and investigate the cause of the release? [3745-66-96(A)]		
b. Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time? [3745-66-96(B)(1)]		
c. Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment? [3745-66-96(B)(2)]		
d. Immediately conducted a visual inspection of the release? [3745-66-96(C)]		
e. Prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C)(1)]		*
f. Properly dispose of any visible contamination of the soil or surface water? [3745-66-96(C)(2)]		
g. Report the release to the Director within 24 hours unless it was less than 1 lb. and was cleaned up immediately? [3745-66-96(D)(1)(2)]		
h. Submitted a written report of the incident to the Director within 30 days of the release? [3745-66-96(C)(3)]		
i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96-(E)]		
j. For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)]		

Note: The requirements noted in 1.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.

* a-j: cannot be determined because MM does not do tank inspections

	Y/N/NA	RMK #
2. In the event that the repairs to the tank system were major (replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from a registered, Professional Engineer attesting that the repaired unit is capable of handing hazardous waste? [3745-66-96(F)]	____	____
Was a copy of the certification submitted to the Director within seven days after returning the system to use? [3745-66-96(F)]	____	____
3. If the o/o was unable to repair and return the unit to service as described in 1.a. through 1.e., was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)]	____	____
4. Has the o/o of a tank system **with a variance from secondary containment** from which a release has occurred but <u>has not</u> migrated beyond the zone of engineering control complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G)(3)]	NA	____
If soils cannot be removed, has the tank been closed? [3745-66-93(G)(3)]	NA	____
5. Has the o/o of a tank system **with a variance from secondary containment** from which a release has occurred and <u>has</u> migrated from the zone of engineering control complied with 3745-66-96(A) through (D) and prevented migration and decontaminated soil? [3745-66-93(G)(4)]	NA	____

*

REMARKS - TANK SYSTEMS FOUND LEAKING OR UNFIT FOR USE

* Unable to determine since MM does not perform daily inspections or know the age of the tank.

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: MASTER METALS, INC.

U.S. EPA ID No.: OHD 097 613 871

Street: 2850 WEST THIRD ST.

City: CLEVELAND State: OH Zip: 44113

Telephone: (216) 621-2361

Inspection Date: 4/16/91 Time: 1:00 (am/pm)

Weather Conditions: _____

	Name	Agency/Title	Telephone
Inspectors:	LINDA LAGUNZAD	OEPA	(216) 425-9171
	MARK BERGMAN	OEPA	(216) 425-9171

Facility Representatives: _____

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

	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents					
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]				✓ D008 K069	

* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

THIS FACILITY IS A 2° LEAD SMELTING FACILITY. IT RECLAIMS LEAD WITH 2 ROTARY FURNACES. IT ACCEPTS FROM OFF-SITE LEAD DROSS, INDUSTRIAL BATTERIES, SCRAP & OTHER RESIDUALS (D008), AS WELL AS LEAD BAGHOUSE DUST (K069). THE BATTERY SCRAP IS EXEMPT FROM MANIFESTING. OHIO PART B SUBMITTED APRIL 1990. THE FACILITY HAS AN ELEMENTARY NEUTRALIZATION OPERATION, FOR THE BATTERY ACID TANK, WHICH IS ALSO EXEMPT.

LDR Waste Management:

FROM THE INDUSTRIAL BATTERIES: when they are "cracked" sulfuric acid drains to a nearby drain then to a sump then from an open pipe to an underground storage tank. The material in the tank is a mixture of rainwater, sulfuric acid, and sludge. It is pumped out periodically by Clean Harbors of Ohio. Clean Harbors does the analyses on these shipments.

Summary:

Signature: Linda G Laguzzad

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:

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]**:
   D008, K069

*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 _____

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.

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
___	___	___
___	___	___
___	___	___

*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
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

* 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 $\geq$50 ppm

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ 50 to 500 ppm PCBs
___ $\geq$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)]

_____

_____

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 ___

*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 ✓

*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 ✓ (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 ✓ (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 ✓ (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 ✓

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 ___

(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 ✓

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 ✓

*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 ✓ 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
____	_____
____	_____
____	_____

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

Yes ___ 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 ✓

b. Is a notification 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 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 ✓ (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 ✓ (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 ___ 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 ✓

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 ✓

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

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes
K039	rotary kiln furnace	

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 RESTRICTION 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 ___	No ___	NA ___
F020-F023 and F026-F028 Dioxins	Yes ___	No ___	NA ___
California List Wastes	Yes ___	No ___	NA ___
First, Second, and Third Third Wastes	Yes ✓	No ___	NA ___

Comments_____

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

Yes ___ No ___ NA ✓

3. What date was the waste analysis plan last revised? 4/9/90

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 ___ No ✓

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

___ Generator provides data
___ Facility performs analyses in 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 ___ 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 ___

*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, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (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 ___

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, 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 ✓

If yes, list the wastes for which PELT 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 ___ 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 ___ 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 ___

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 ___

*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 ___ 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 ___ No ___

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

Yes ___ No ___ (If No, go to 2.)

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

Yes ___ No ___

If yes, state how:_____

2. Are prohibited wastes stored on site in tanks?

Yes ___ No ✓ (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 Yes, go to 3.)

Can the facility show that such accumulation is neccesary 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 ___ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(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 ✓ (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___

Can the facility show that such accumulation is neccesary 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 ___ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(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 ✓ (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 non-hazardous 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 fol'' ing 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]** NA

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

   Yes ___ No ✓ (If No, 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 ✓ (If No, 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 ___ 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 ___

b. If characteristic wastes are treated 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 ___

*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 (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?

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

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

Waste Code	Receiving Facility
____	_____
____	_____
____	_____

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

Yes ___ 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 ___

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

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

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

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

b. 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 5.)

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) amd 268.7(b)(5)?

Yes ___ No ___

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

a. Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?

Yes ___ No ___ (If No, go to 6.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

b. Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]

Yes ___ No ___

6. 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 ___ (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 22665-22666]

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

Check appropriate category:

___Dilutes to meet treatment standards
___Dilutes to render waste non-hazardous

Do 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, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ___

Comments_____

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

_____
_____
_____
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LAND DISPOSAL RESTRICTIONS INSPECTION

V. TRANSPORTER REQUIREMENTS NA

A. Does the transporter accumulate restricted wastes for more than 10 days? [40 CFR 268.50(a)(3)]

Yes ___ No ✓

If yes, check the appropriate regulatory status:

___ Interim status for storage
___ RCRA permit for storage

(The TSD checklist must also be completed.)

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

_____
_____
_____

B. Does the transporter mix or combine restricted wastes of different DOT shipping descriptions? [40 CFR 263.10(c)(2)]?

Yes ___ No ___

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

_____
_____
_____

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

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

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units or Process

Are treatment residuals generated from these units?

Yes ___ No ___

Comments_____

Are residuals further treated, stored for greater than 10 days, or disposed on site?

Yes ___ No ___ NA ___

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

WEEKLY FACILITY INSPECTION FORM

INSPECTOR NAME: Tom Adams DATE: 7/18/90

This inspection for must be filed WEEKLY as reuired by 40CFR Part 265.15. Master Metlas must inspect the facility for malfunctions, deterioration, operator errors and discharges which may be causing or lead to; a release of hazardous materials to the environments, or a threat to human health & safety.

	**** CONDITION ****			
	Good	Fair	Repair	Describe
DRUM STORAGE AREA:				
Aisle Space/Access		✓		
Condition of Drums		✓		

Are any containers open, falling, punctured or leaking (YES) NO
If Yes, describe: A few Drums
Are containers labelled with the Receiving Number? (YES) NO
If No, Describe:

CONCRETE SURFACES:				
Drum Storage Area	✓			
Road/Aisleways	✓			
Furnace Loading Area	✓			
EMISSION CONTROL SYSTEM:				
Furnace Air Ducts	✓			
Furnace Door	✓			
Alloy Mixing Pots Hoods	✓			
Air Ducts to Baghouse	✓			
Baghouse .....Fan	✓			
.....Walls	✓			
.....Bags				
SECURITY SYSTEM:				
Security Fences:				
Northern	✓			
Southern	✓			
Eastern	✓			
Western	✓			
Warning Signs	✓			
Main Gate & Entrance	✓			
Outdoor Lighting	✓			

WEEKLY FACILITY INSPECTION FORM

INSPECTOR NAME: Chris Tywon DATE: 7/6/90

This inspection for must be filed WEEKLY as reuired by 40CFR Part 265.15. Master Metlas must inspect the facility for malfunctions, deterioration, operator errors and discharges which may be causing or lead to; a release of hazardous materials to the environments, or a threat to human health & safety.

	**** CONDITION ****			
	Good	Fair	Repair	Describe
DRUM STORAGE AREA:				
Aisle Space/Access		✓		
Condition of Drums	✓			

Are any containers open, falling, punctured or leaking YES (NO)
If Yes, describe:
Are containers labelled with the Receiving Number? (YES) NO
If No, Describe:

CONCRETE SURFACES:				
Drum Storage Area	✓			
Road/Aisleways	✓			
Furnace Loading Area	✓			
EMISSION CONTROL SYSTEM:				
Furnace Air Ducts	✓			
Furnace Door	✓			
Alloy Mixing Pots Hoods	✓			
Air Ducts to Baghouse	✓			
Baghouse .....Fan	✓			
.....Walls	✓			
.....Bags	✓			
SECURITY SYSTEM:				
Security Fences;				
Northern	✓			
Southern	✓			
Eastern	✓			
Western	✓			
Warning Signs	✓			
Main Gate & Entrance	✓			
Outdoor Lighting	✓			

WEEKLY FACILITY INSPECTION FORM

INSPECTOR NAME: Chris Tywon DATE: 6/29/90

This inspection for must be filed WEEKLY as reuired by 40CFR Part 265.15. Master Metlas must inspect the facility for malfunctions, deterioration, operator errors and discharges which may be causing or lead to; a release of hazardous materials to the environments, or a threat to human health & safety.

	**** CONDITION ****			
	Good	Fair	Repair	Describe
DRUM STORAGE AREA:				
Aisle Space/Access	✓			
Condition of Drums	✓			

Are any containers open, falling, punctured or leaking YES (NO)
If Yes, describe:
Are containers labelled with the Receiving Number? (YES) NO
If No, Describe:

CONCRETE SURFACES:				
Drum Storage Area	✓			
Road/Aisleways	✓			
Furnace Loading Area	✓			
EMISSION CONTROL SYSTEM:				
Furnace Air Ducts	✓			
Furnace Door	✓			
Alloy Mixing Pots Hoods	✓			Rebuilt Hood
Air Ducts to Baghouse	✓			
Baghouse .....Fan	✓			
.....Walls	✓			
.....Bags	✓			
SECURITY SYSTEM:				
Security Fences:				
Northern	✓			
Southern	✓			
Eastern	✓			
Western	✓			
Warning Signs	✓			
Main Gate & Entrance	✓			
Outdoor Lighting	✓			

WEEKLY FACILITY INSPECTION FORM

INSPECTOR NAME: Chris Tywon DATE: 6/22/90

This inspection for must be filed WEEKLY as reuired by 40CFR Part 265.15. Master Metlas must inspect the facility for malfunctions, deterioration, operator errors and discharges which may be causing or lead to; a release of hazardous materials to the environments, or a threat to human health & safety.

**** CONDITION ****

	Good	Fair	Repair	Describe
DRUM STORAGE AREA:				
Aisle Space/Access	✓			
Condition of Drums	✓			

Are any containers open, falling, punctured or leaking YES (NO)
If Yes, describe:
Are containers labelled with the Receiving Number? (YES) NO
If No, Describe:

	Good	Fair	Repair	Describe
CONCRETE SURFACES:				
Drum Storage Area	✓			
Road/Aisleways	✓			
Furnace Loading Area	✓			
EMISSION CONTROL SYSTEM:				
Furnace Air Ducts	✓			
Furnace Door	✓			
Alloy Mixing Pots Hoods	✓			
Air Ducts to Baghouse	✓			
Baghouse .....Fan	✓			
.....Walls	✓			
.....Bags	✓			
SECURITY SYSTEM:				
Security Fences:				
Northern	✓			
Southern	✓			
Eastern	✓			
Western	✓			
Warning Signs	✓			
Main Gate & Entrance	✓			
Outdoor Lighting	✓			

WEEKLY FACILITY INSPECTION FORM

INSPECTOR NAME: Chris Tywon DATE: 6/15/90

This inspection for must be filed WEEKLY as reuired by 40CFR Part 265.15. Master Metlas must inspect the facility for malfunctions, deterioration, operator errors and discharges which may be causing or lead to; a release of hazardous materials to the environments, or a threat to human health & safety.

	**** CONDITION ****			
	Good	Fair	Repair	Describe
DRUM STORAGE AREA:				
Aisle Space/Access	✓			
Condition of Drums	✓			

Are any containers open, falling, punctured or leaking YES (NO)
If Yes, describe:
Are containers labelled with the Receiving Number? (YES) NO
If No, Describe:

CONCRETE SURFACES:				
Drum Storage Area	✓			
Road/Aisleways	✓			
Furnace Loading Area	✓			New Concrete Under old Furnace
EMISSION CONTROL SYSTEM:				
Furnace Air Ducts	✓			
Furnace Door	✓			
Alloy Mixing Pots Hoods	✓			
Air Ducts to Baghouse	✓			
Baghouse .....Fan	✓			
.....Walls	✓			
.....Bags	✓			
SECURITY SYSTEM:				
Security Fences:				
Northern	✓			
Southern	✓			
Eastern	✓			
Western	✓			
Warning Signs	✓			
Main Cate & Entrance	✓			
Outdoor Lighting	✓			

WEEKLY FACILITY INSPECTION FORM

INSPECTOR NAME: Chris Tywon DATE: 6/8/90

This inspection for must be filed WEEKLY as reuired by 40CFR Part 265.15. Master Metlas must inspect the facility for malfunctions, deterioration, operator errors and discharges which may be causing or lead to; a release of hazardous materials to the environments, or a threat to human health & safety.

	**** CONDITION **** Good	Fair	Repair	Describe
DRUM STORAGE AREA:				
Aisle Space/Access	✓			
Condition of Drums	✓			

Are any containers open, falling, punctured or leaking YES NO

If Yes, describe:

Are containers labelled with the Receiving Number? YES NO

If No, Describe: Need Labels For Used Fire Brick From old Rotary

CONCRETE SURFACES:				
Drum Storage Area	✓			
Road/Aisleways		✓		
Furnace Loading Area	✓			New Concrete Under New Rotary
EMISSION CONTROL SYSTEM:				
Furnace Air Ducts	✓			Replaced/Wired Motors to old Bag House
Furnace Door	✓			
Alloy Mixing Pots Hoods	✓			
Air Ducts to Baghouse	✓			
Baghouse .....Fan	✓			
.....Walls	✓			
.....Bags	✓			Replaced Bags in #3 on Bag House #1
SECURITY SYSTEM:				
Security Fences:				
Northern	✓			
Southern	✓			
Eastern	✓			
Western	✓			
Warning Signs	✓			
Main Gate & Entrance	✓			
Outdoor Lighting	✓			

WEEKLY FACILITY INSPECTION FORM

INSPECTOR NAME: Tom Hilm DATE: 6/6/90

This inspection for must be filed WEEKLY as reuired by 40CFR Part 265.15. Master Metlas must inspect the facility for malfunctions, deterioration, operator errors and discharges which may be causing or lead to; a release of hazardous materials to the environments, or a threat to human health & safety.

	**** CONDITION ****			
	Good	Fair	Repair	Describe
DRUM STORAGE AREA:				
Aisle Space/Access	✓			
Condition of Drums	✓			

Are any containers open, falling, punctured or leaking YES (NO)
If Yes, describe:
Are containers labelled with the Receiving Number? (YES) NO
If No, Describe:

CONCRETE SURFACES:				
Drum Storage Area	✓			
Road/Aisleways		✓		
Furnace Loading Area		✓		
EMISSION CONTROL SYSTEM:				
Furnace Air Ducts	✓			
Furnace Door	✓	✓		
Alloy Mixing Pots Hoods	✓			
Air Ducts to Baghouse	✓			
Baghouse .....Fan	✓			
.....Walls	✓			
.....Bags	✓		✓	CHAMBER #3 ON BAG HOUSE #1
SECURITY SYSTEM:				
Security Fences:				
Northern	✓			
Southern	✓			
Eastern	✓			
Western	✓			
Warning Signs	✓			
Main Gate & Entrance	✓			
Outdoor Lighting	✓			

WEEKLY FACILITY INSPECTION FORM

INSPECTOR NAME: Tom Nelson DATE: 5/25/90

This inspection for must be filed WEEKLY as reuired by 40CFR Part 265.15. Master Metlas must inspect the facility for malfunctions, deterioration, operator errors and discharges which may be causing or lead to; a release of hazardous materials to the environments, or a threat to human health & safety.

	**** CONDITION ****			
	Good	Fair	Repair	Describe
DRUM STORAGE AREA:				
Aisle Space/Access	✓			
Condition of Drums	✓			

Are any containers open, falling, punctured or leaking YES (NO)
If Yes, describe:
Are containers labelled with the Receiving Number? (YES) NO
If No, Describe:

CONCRETE SURFACES:				
Drum Storage Area	✓			
Road/Aisleways		✓		
Furnace Loading Area		✓		
EMISSION CONTROL SYSTEM:				
Furnace Air Ducts	✓			
Furnace Door	✓	✓		
Alloy Mixing Pots Hoods	✓			
Air Ducts to Baghouse	✓			
Baghouse .....Fan	✓			
.....Walls	✓			
.....Bags	✓			
SECURITY SYSTEM:				
Security Fences:				
Northern	✓			
Southern	✓			
Eastern	✓			
Western	✓			
Warning Signs	✓			
Main Gate & Entrance	✓			
Outdoor Lighting	✓			

WEEKLY FACILITY INSPECTION FORM

INSPECTOR NAME: Tom Kelly DATE: 5/18/90

This inspection for must be filed WEEKLY as reuired by 40CFR Part 265.15. Master Metlas must inspect the facility for malfunctions, deterioration, operator errors and discharges which may be causing or lead to; a release of hazardous materials to the environments, or a threat to human health & safety.

	**** CONDITION ****			
	Good	Fair	Repair	Describe
DRUM STORAGE AREA:				
Aisle Space/Access	✓			
Condition of Drums	✓			

Are any containers open, falling, punctured or leaking YES (NO)
If Yes, describe:
Are containers labelled with the Receiving Number? (YES) NO
If No, Describe:

CONCRETE SURFACES:				
Drum Storage Area	✓			
Road/Aisleways		✓		
Furnace Loading Area		✓		
EMISSION CONTROL SYSTEM:				
Furnace Air Ducts	✓			
Furnace Door	✓	✓		
Alloy Mixing Pots Hoods	✓			
Air Ducts to Baghouse	✓			
Baghouse .....Fan	✓			
.....Walls	✓			
.....Bags	✓			
SECURITY SYSTEM:				
Security Fences:				
Northern	✓			
Southern	✓			
Eastern	✓			
Western	✓			
Warning Signs	✓			
Main Gate & Entrance	✓			
Outdoor Lighting	✓			

7/17/90

Rec'd at inspection from MASTER METALS
C. McCard

WEEKLY FACILITY INSPECTION FORM

INSPECTOR NAME: Tom Nelson DATE: 5/11/90

This inspection for must be filed WEEKLY as reuired by 40CFR/Part 265.15. Master Metlas must inspect the facility for malfunctions, deterioration, operator errors and discharges which may be causing or lead to; a release of hazardous materials to the environments, or a threat to human health & safety.

	**** CONDITION ****			
	Good	Fair	Repair	Describe
DRUM STORAGE AREA:				
Aisle Space/Access	✓			
Condition of Drums	✓			

Are any containers open, falling, punctured or leaking YES (NO)
If Yes, describe:
Are containers labelled with the Receiving Number? (YES) NO
If No, Describe:

CONCRETE SURFACES:				
Drum Storage Area	✓			
Road/Aisleways	✓	✓		
Furnace Loading Area		✓		
EMISSION CONTROL SYSTEM:				
Furnace Air Ducts	✓			
Furnace Door	✓			
Alloy Mixing Pots Hoods	✓			
Air Ducts to Baghouse	✓			
Baghouse .....Fan	✓			
.....Walls	✓			
.....Bags	✓			
SECURITY SYSTEM:				
Security Fences:				
Northern	✓			
Southern	✓			
Eastern	✓			
Western	✓			
Warning Signs	✓			
Main Gate & Entrance	✓			
Outdoor Lighting	✓			

Daily Facility Inspection Form

Inspector Name: Tom Helm Date: 7/13/90

This inspection form must be filed DAILY as required by 40CFR Part 265.15.

Master Metals must inspect the facility for malfunctions, deterioration, operator errors and discharge which may be causing or lead to; a release of hazardous materials to the environments, or a threat to human health & safety.
Code:

Good-proper Fair-functional, will need repair soon, poor , repair-replace

WASTE INVENTORY

Piles

	Tarp condition good	fair	repair	remedial action	action date
Lenox					
Battery casings					

Storage Containters

	Tarp condition good	fair	repair	remedial action	action date
Container #1			✓		
#2			✓		
#3	✓				
#4		✓			
#5		✓			
#6	✓				
#7	NOT	REP			
#8			✓		
#9	✓				
#10	EMPTY				
#11		✓			

Drum Inventory

	Covered drum condition good	fair	repair	remedial action	action date
Lead dross waste		✓			
other wastes	✓				

(K069)

NOTE: All drums are assumed to be covered, mark location of repair items in remedial action section.

Daily Facility Inspection Form

Inspector Name: Chris Tywon Date: 7/12/90

This inspection form must be filed DAILY as required by 40CFR Part 265.15.

Master Metals must inspect the facility for malfunctions, deterioration, operator errors and discharge which may be causing or lead to; a release of hazardous materials to the environments, or a threat to human health & safety.

Code:

Good-proper Fair-functional, will need repair soon, poor , repair-replace

WASTE INVENTORY

Piles

	Tarp condition good	fair	repair	remedial action	action date
Lenox	✓				
Battery casings	✓				

Storage Containters

	Tarp condition good	fair	repair	remedial action	action date
Container #1	✓				
#2	✓				
#3	✓				
#4	✓				
#5	✓				
#6	✓				
#7	No	Need			
#8	✓				
#9	✓				
#10	Empty				
#11	✓				

Drum Inventory

	Covered drum condition good	fair	repair	remedial action	action date
Lead dross waste	✓				
other wastes	✓				

(K069)

NOTE: All drums are assumed to be covered, mark location of repair items in remedial action section.

Daily Facility Inspection Form

Inspector Name: CHRIS TYWON Date: 7/11/90

This inspection form must be filed DAILY as required by 40CFR Part 265.15.

Master Metals must inspect the facility for malfunctions, deterioration, operator errors and discharge which may be causing or lead to; a release of hazardous materials to the environments, or a threat to human health & safety.

Code:

Good-proper Fair-functional, will need repair soon, poor , repair-replace

WASTE INVENTORY

Piles

	Tarp condition good	fair	repair	remedial action	action date
Lenox	✓				
Battery casings	✓				

Storage Containters

	Tarp condition good	fair	repair	remedial action	action date
Container #1	✓				
#2	✓				
#3	✓				
#4	✓				
#5	✓				
#6	✓				
#7	No Need				
#8	✓				
#9	✓				
#10	Empty				
#11	✓				

Drum Inventory

	Covered drum condition good	fair	repair	remedial action	action date
Lead dross waste	✓				
other wastes	✓				

(K069)

NOTE: All drums are assumed to be covered, mark location of repair items in remedial action section.

DAILY FACILITY INSPECTION FORM

INSPECTOR NAME:_____ DATE:_____

This inspection form must be filed DAILY as required by 40CFR Part265.15.

Master Metals must inspect the facility for malfunctions, deterioration, operator errors and discharges which may be causing or lead to; a release of hazardous materials to the environments, or a threat to human health & safety.

Code:
good=proper fair=functional, will need repair soon, repair=replace

WASTE INVENTORY

PILES

	tarp condition good	fair	repair	remedial action	action date
Lead Dross Waste	____	____	_____	_____	_____
OTHER Waste (_____)	____	____	_____	_____	_____

STORAGE BINS

		tarp condition good	fair	repair	remedial action	action date
Battery Waste	1	____	____	_____	_____	_____
	2	____	____	_____	_____	_____
K069 Waste	1	____	____	_____	_____	_____
	2	____	____	_____	_____	_____
Lead Dross	1	____	____	_____	_____	_____
	2	____	____	_____	_____	_____
	3	____	____	_____	_____	_____

DRUM INVENTORY

	covered drum condition good	fair	repair	remedial action	action date
Lead Dross Waste	____	____	_____	_____	_____
other wastes (_____)	____	____	_____	_____	_____

NOTE: ALL DRUMS ARE ASSUMED TO BE COVERED, MARK LOCATION OF REPAIR ITEMS IN REMEDIAL ACTION SECTION

UNLESS OTHER WISE NOTED

TRANSFER EQUIPMENT:

	******Equipment Condition******			
	Good	Fair	Repair Required	Explain Condition
Towmotors	_____	_____	_____	_____
Material Transfer Shovels	_____	_____	_____	_____
Sweepers	_____	_____	_____	_____
Furnace doors: large	_____	_____	_____	_____
small	_____	_____	_____	_____

RELEASE INCIDENT

	location	action taken	date of action
any spills of chemicals?	_____	_____	_____
any leaks from containers?	_____	_____	_____
fallen over stock?	_____	_____	_____
uncovered items?	_____	_____	_____
OTHER ITEMS?	_____	_____	_____

persons involved _____

_____

Envisage Environmental Incorporated

Envisage Environmental Incorporated
P.O. Box 152, Richfield, Ohio 44286
Phone (216) 526-0990

REPORT NO. 90-1295
COMPANY Master Metals
TITLE
DATE 6-4-90

COPY

MASTER METALS INC.
2850 WEST THIRD STREET
CLEVELAND, OHIO

OEPA RESPONSE FOR THE INSPECTION
OF MARCH 26 & 27, 1990

SUBMITTED - JUNE 4, 1990

Envisage Environmental Incorporated P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

COPY

May 31, 1990

Mr. Mark Bergman
OEPA, NEDO
DSHWM
2110 East Aurora Road
Twinsburg, Ohio 44087

Re: Master Metals Inc.

Dear Mr. Bergman:

This response has been written on behalf of Master Metals Inc., and the information has been compiled by Envisage Environmental in cooperation with Master Metals. Please find enclosed the response to the violations and recommendations that were generated as a result of your site inspection of March 26 & 27, 1990.

A response has been generated for each item as addressed in your letter dated April 11 & 13, 1990. Mr. Mickey received this correspondence on April 17, 1990.

If you have any questions, or if any of the responses are insufficient, please contact me at 526-0990. I look forward to resolving these matters.

Respectfully,

ENVISAGE ENVIRONMENTAL INC.

Thomas J. Monito
Regulatory Compliance Manager

MASTER METALS INC.

Douglas K. Mickey
President

Encl. OEPA Response

COPY

Master Metals, Inc.

2850 West Third Street

Cleveland, Ohio 44113

OEPA Response for the Inspection of

March 26 & 27, 1990

Date Submitted:

June 4, 1990

Envisage
Environmental
Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

OEPA INSPECTION of 3-26 & 27-90 RESPONSE

1) Satellite Accumulation Containers (OAC 3745-52-34)

A new system for collecting baghouse dust has been employed at Master Metals, (See item # 6). "Hazardous Waste" labels shall be placed on the collection bags as they are attached to the system. A designated employee shall be responsible for ensuring proper markings on these Satellite Accumulation Containers.
(Please see Photo's # 1 & 2)

2) Signs for Bins (OAC 3745-65-14)

The OAC rule cited requires that a TSD operator "shall prevent the unknowing entry, and minimize the possibility of unauthorized entry... onto the active portion of facility". This shall be done by the following:

- 24 hr. surveillance system

OR...

- Fence in good repair that completely surrounds the active portion of the facility (or entire facility) and a means to control entry at all times to the active portion of facility (or entire facility)

AND...

- Signs with the legend "Danger--Unauth. Pers. Keep Out" posted at each entrance to the active portion of facility... to be seen from every approach. Signs are to be legible at 25 ft., and existing signs with different wording may be used if they convey the restricted access and danger of area.

To this we offer the following:

Master Metals has:
- A fence surrounding entire facility
- "Danger--Unauth..." signs on outside of fence and at entrances to facility
- Additional warning signs at entrances to the "active portion" of the facility
  (ie., Author. Pers. Only. All visitors must) (report to main office)
- Limited access to facility through gates.
- Warning signs currently on bins

It is believed that these signs and controls adequately comply with the requirements of this section, and that the aforementioned signs on bins are not required.

If this section of OAC 3745-65 has been interpreted incorrectly, please advised as to the proper requirements of this regulation.

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

OEPA INSPECTION of 3-26 & 27-90 RESPONSE (con't.)

3) Contingency Plan Refusals

A copy of the most recent Contingency Plan for Master Metals are to be sent to the following.

- Cleveland Fire Department
- Cleveland Police Department
- Metropolitan General Hospital
- OEPA, NEDO
- NEORSD
- Local Emergency Response Team

A letter requesting an arrangement/agreement concerning response to an emergency situation is to be sent with the Contingency Plan to each party listed above. A copy of this letter, as well as the refusal documentation has been included in this response.

4) Operating Record (OAC 3745-65-73)

Tom Helms has collected the necessary information concerning the items mentioned. The current inventories & descriptions have been entered into the operating log. Copies of the initial entries have been included with this response.

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

OEPA INSPECTION of 3-26 & 27-90 RESPONSE (con't.)

5) Condition of Portable Bins (OAC 3745-65-31/ -66-73/ -66-71)

New tarps have been fitted and installed on the bins. Permanent fastening hooks have been installed to better secure the tarps, and facilitate repair/replacement as needed. (See Photo's # 3 - 9)

The holes noted in Bin #9 have been repaired. (See Photo # 10)

All pertinent employees have been instructed to refrain from adding materials to bins that contain water. Methods are being employed to reduce, if not eliminate, the existence of liquids in the bins. A policy is to be developed on the handling of liquids if they are noted in a container.

All lead residue materials noted around bins has been cleaned up and properly handled. Employees have been instructed to clean-up all spilled material as it is noted. (See Photo #11)

The "Acid puddle" has been directed to the trench drain which flows to the collection tank. A "low spot" on the pad was identified as the cause of the puddling in this area. This area has been filled and leveled with a latex concrete to eliminate this problem. In addition, personnel working in this area have been instructed to squeegee all standing liquids to the trench drain. (Photo presently unavaliable; Photograph to be forwarded upon obtaining legible photo)

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

OEPA INSPECTION of 3-26 & 27-90 RESPONSE (con't.)

6) Drum Storage (OAC 3745-65-31/ -66-73/ -66-71)

All drums containing hazardous materials have been fitted with a lid. The brick residue near the kiln brick drums has been cleaned up and containerized. (See Photo #12)

The old method of collecting the flue dust as generated from the baghouse has been discontinued to eliminate fugitive emissions due to wind dispersal. Collection bags have been installed at all accumulation points on the baghouse. These bags fit tightly over the dispensing point, and therefore eliminate all wind dispersion problems associated with this area. (See Photo's # 1 & 2)

The drum noted on the railroad spur has been retrieved, tested for integrity, and placed in the appropriate storage area.

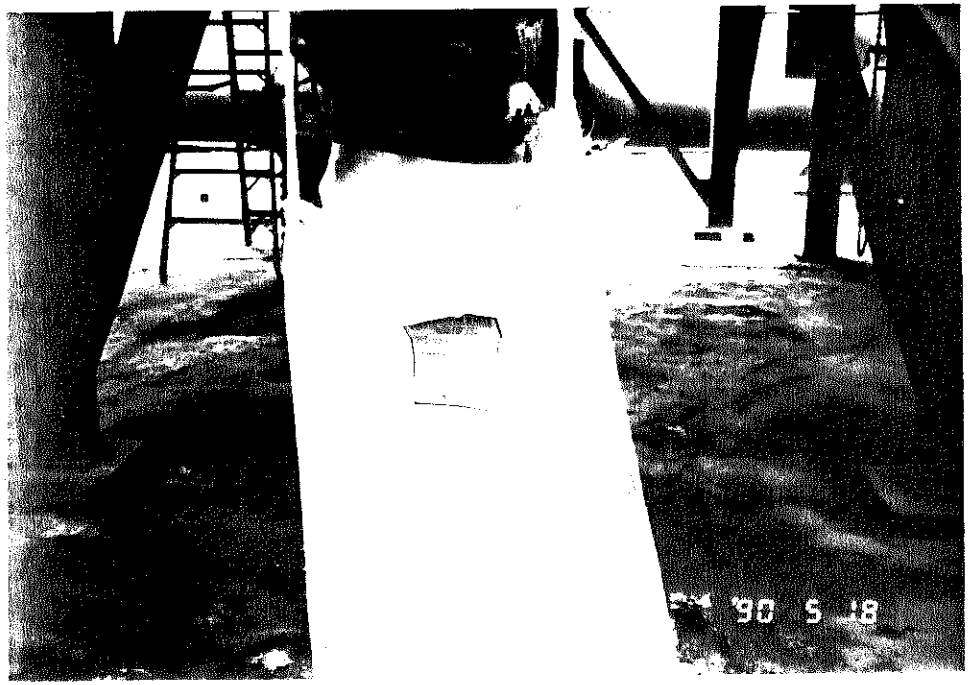
7) Waste Piles (OAC 3745-67-53)

All spillage of lead residues near battery pile have been cleaned up. A tarp has been placed over this pile to prevent contact with precipitation. The battery casings are being rapidly removed and disposed of, in order to completely eliminate the pile. (See Photo #13)

8) Labeling of Drums and Bins

Tom Helms has removed and/or obscured all labels/markings from improperly labeled drums. Employees have been instructed to remove or paint over labeling/markings from drums as soon as the contents have been removed, and to re-label accordingly when placing materials into drums. (See Photo #14)

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990



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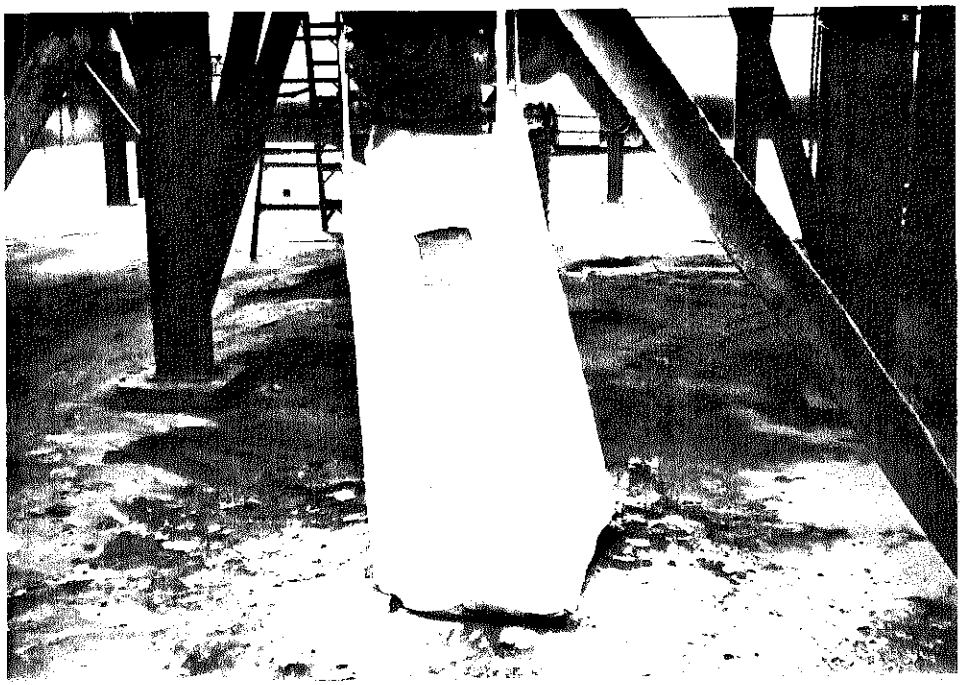

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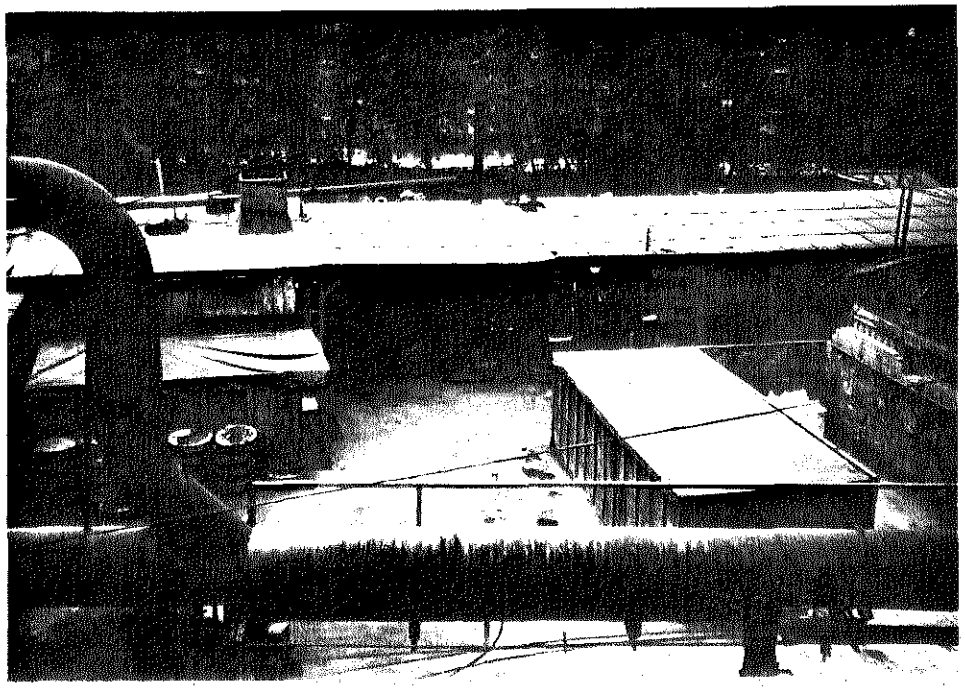

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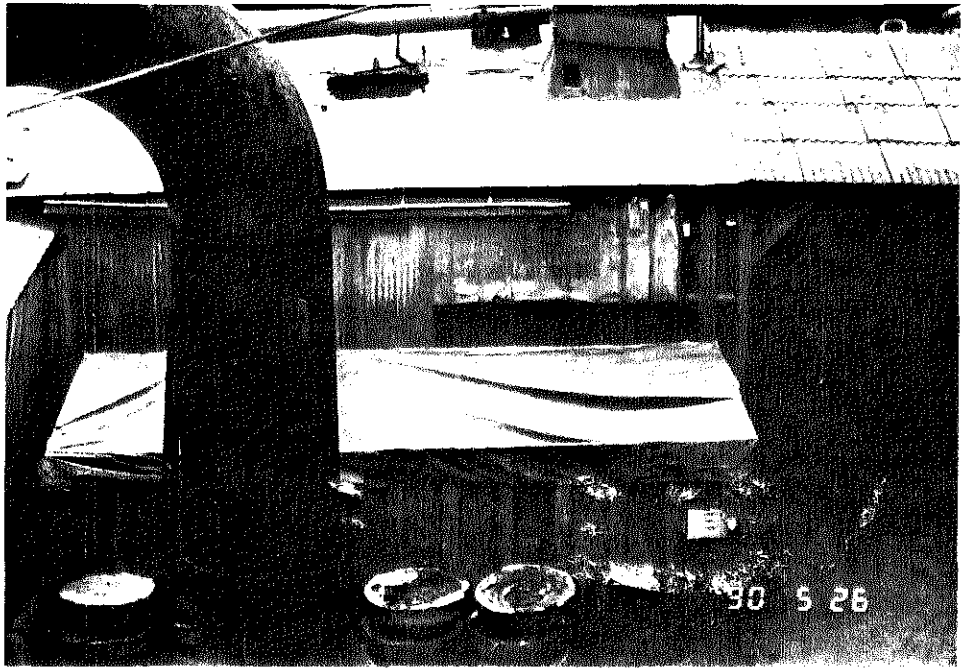

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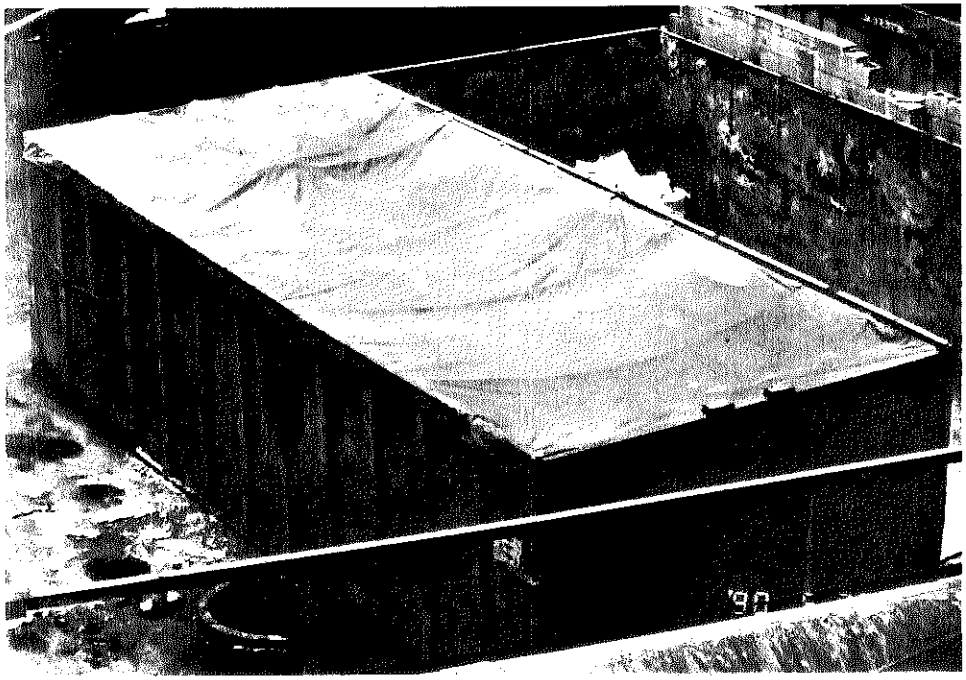

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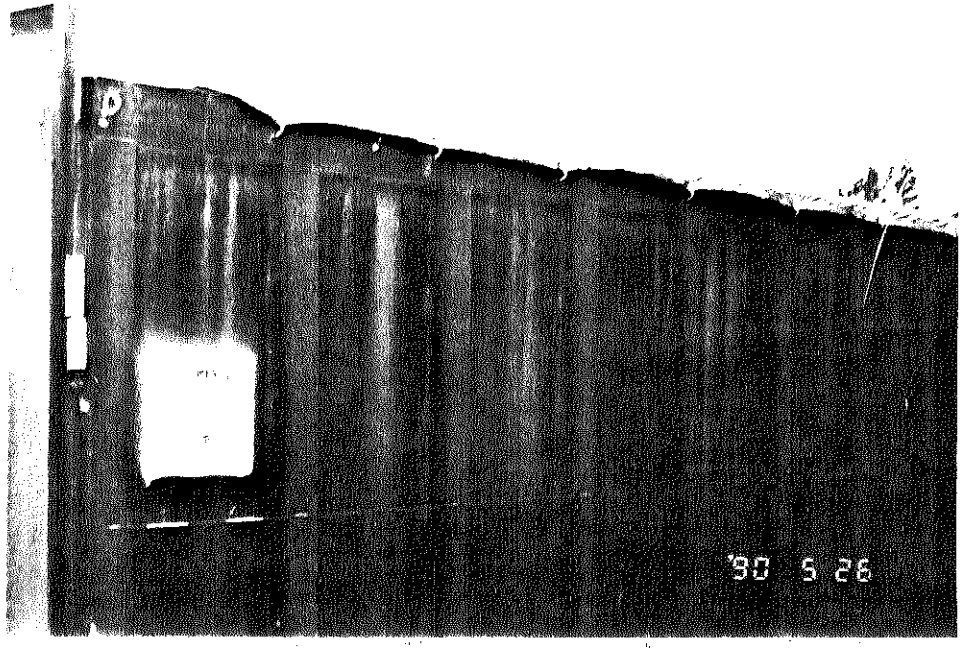

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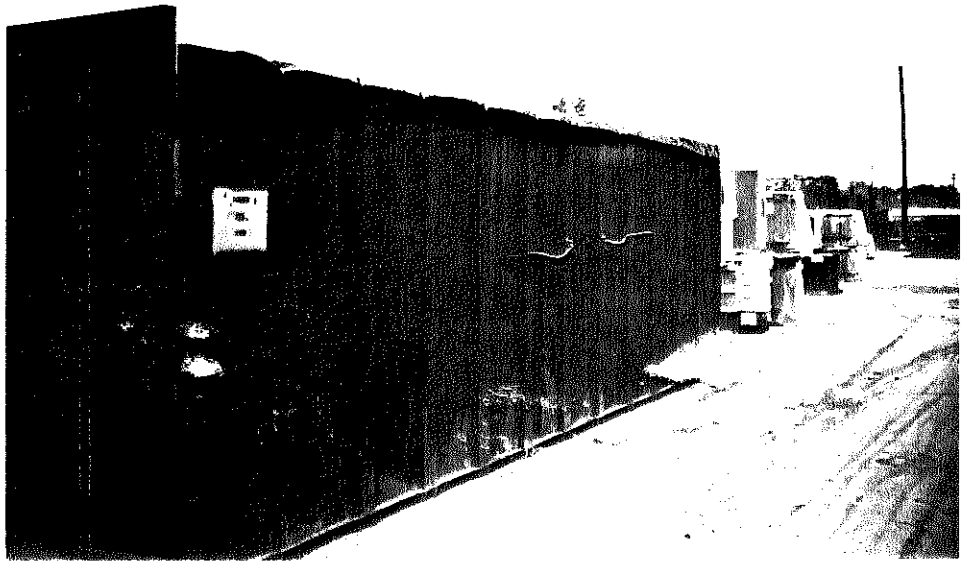

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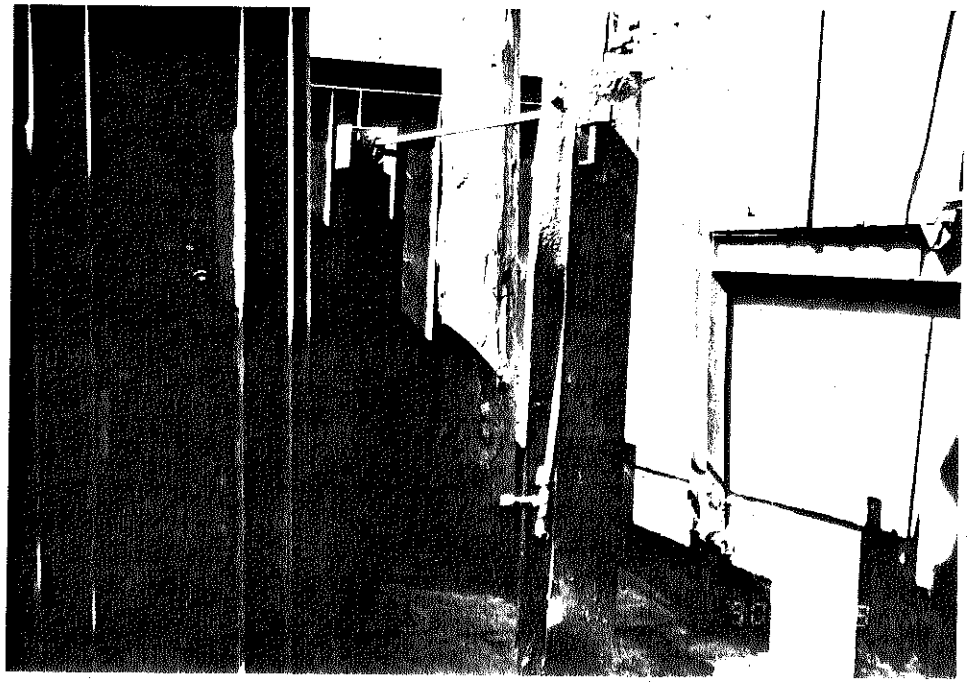

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12.

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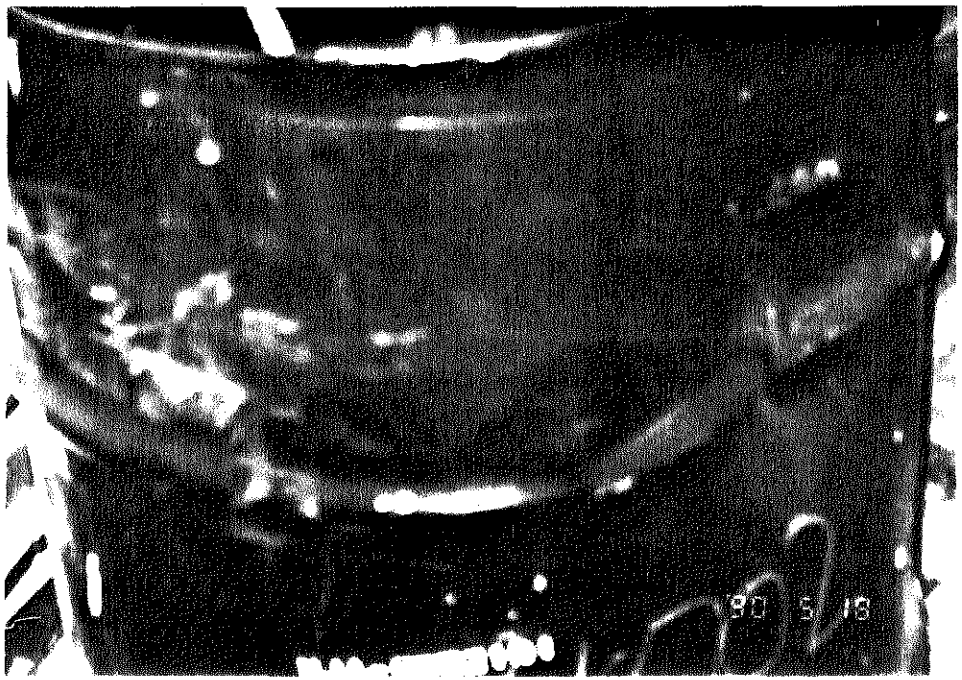


14.

MASTER METALS, INC., 2850 W. THIRD ST., CLEVELAND, OHIO 44113 • (216) 621-2361

Lead Smelter and Refiner

May, 1990

Fire Dept./Police Dept./Hospital
Cleveland, OH 44ABC

Dear Emergency Response Coordinator:

Please find enclosed a copy of the Contingency Plan for Master Metals Inc., located at 2850 West 3rd Street, Cleveland, Ohio.

As per the OAC 3745-65-53, it is required that we "submit to all local Police Departments, Fire Departments, Hospitals, and Emergency Response agencies..." a copy of this Contingency Plan. It is also required by OAC 3745-65-37, that we attempt to enter into an "arrangement/agreement" with the aforementioned parties, to familiarize them with the types of materials handled, the layout of the facility, access and evacuation routes, and the types of injuries that may occur. Please contact Master Metals to schedule a meeting to coordinate these activities, as to comply with the requirements of this section.

Failure to respond to this request within 45 days from receipt of this letter shall result in a "Refusal Statement" for your organization to be kept on file at Master Metals, as per OAC 3745-65-37. This "Refusal Statement" will be kept on file until an "arrangement/agreement" can be reached.

Please review our submittal and contact Master Metals within 45 days. Thank you for your time and cooperation in this matter.

Respectfully,

MASTER METALS INC.

Douglas Mickey
Emergency Response Coordinator

Encl: Contingency Plan

Response Cooperation Agreement:

This agency/company is willing to cooperate with the Master Metals and will respond, if our services are requested, to an emergency situation at the facility.

Authorized Signature:_____

Printed Name:_____ Date:_____

MASTER METALS, INC., 2850 W. THIRD ST., CLEVELAND, OHIO 44113 • (216) 621-2361

Lead Smelter and Refiner

MAY 16 1990

Waste pile #1	4-2-90	
Lenox China Clay	1,170,000	
	370,000	
	800,000 lbs.	5-9-90

MASTER METALS, INC., 2850 W. THIRD ST., CLEVELAND, OHIO 44113 • (216) 621-2361

Lead Smelter and Refiner

... 16 1990

Wast pile #2

Old battery casings

3 bins full	4-2-90
1 bin	5-9-90
2 bins	

MASTER METALS, INC., 2850 W. THIRD ST., CLEVELAND, OHIO 44113 • (216) 621-2361

Lead Smelter and Refiner

1 6 1990

Old rotary brick 4-2-90

EPA Hazardous Waste Number D008

64 drums

Envisage Environmental Incorporated P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

COPY

June 25, 1990

Mr. Mark Bergman
OEPA, NEDO
DSHWM
2110 East Aurora Road
Twinsburg, Ohio 44087

Re: Master Metals Inc.

Dear Mr. Bergman:

Please find enclosed an addendum to the response report submitted to you on May 31, 1990. That report was in response to the violations and recommendations that were generated as a result of your site inspection of March 26 & 27, 1990.

It was stated in response # 5 of the report, that the depressions that caused the formation of the "acid puddle" had been remediated. It was also stated that photographic documentation would be forwarded. This addendum provides these photographs.

Please review these photographs, and contact either Mr. Mickey or myself with any question or comments that you have. Master Metals considers itself in compliance in regards to the OEPA inspections of March 26 & 27, 1990, having successfully addressed all of the violations and concerns cited in the correspondence of April 11, 1990.

Respectfully,

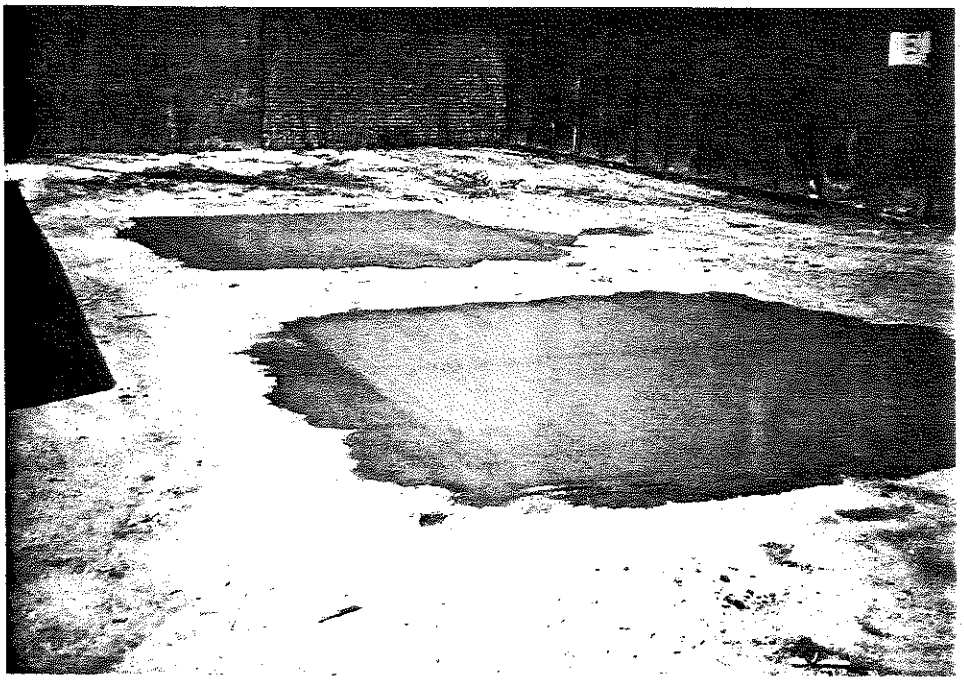
ENVISAGE ENVIRONMENTAL INC.

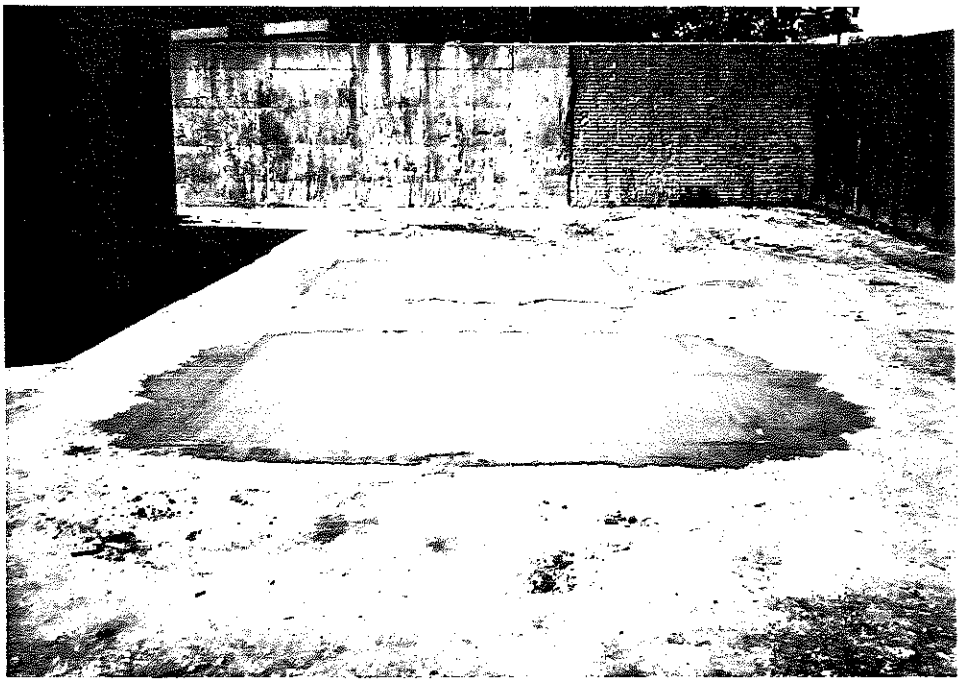
Thomas J. Monito

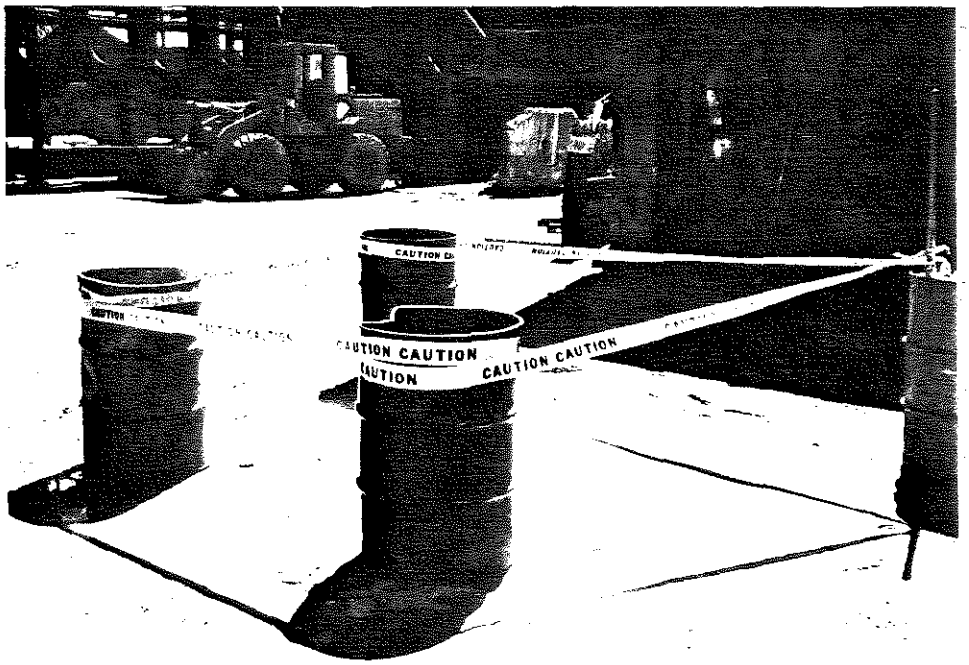
Thomas J. Monito
Regulatory Compliance Manager

Encl. Photographs

cc. Doug Mickey, Master Metals Inc.



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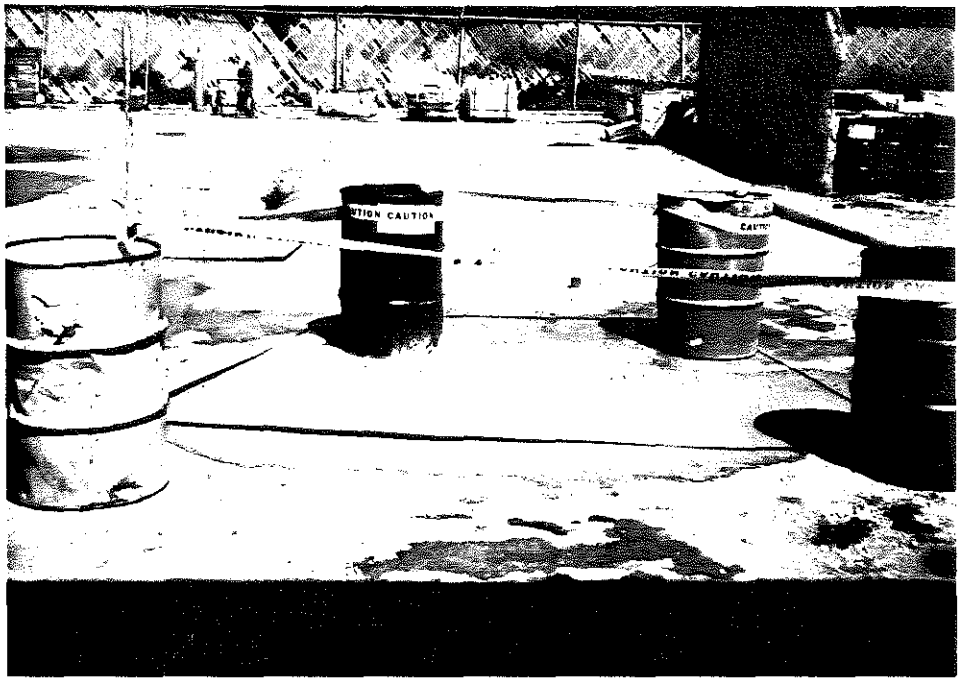

MASTER METALS, INC., 2850 W. THIRD ST., CLEVELAND, OHIO 44113 • (216) 621-2361

Lead Smelter and Refiner

REFUSAL DOCUMENTATION STATEMENT

DATE:_____

TO: File

RE: Contingency arrangement/agreement

Refusing Party:_____

The above mentioned party has failed to respond to Master Metals request of entering into an "arrangement/agreement" concerning emergency situations at the facility. This non-response has been interpreted to be a refusal to enter into said agreement. As per OAC 3745-65-37, this statement shall serve as the documentation of refusal for the party mentioned above.

_____

Emergency Response Coordinator

9. Aisle Space - OAC 3745-65-35 - 40 CFR 265.35

A large area of drums at the rear of the facility were double stacked on skids. The limited aisle space was inadequate to allow proper inspection of all drums. The drums should not be more than two deep between aisles.

10. Inspections and Personnel Training - OAC 3745-66-74 - 40 CFR 265.174
OAC 7345-65-16 - 40 CFR 265.16

The documented inspections conducted on the storage areas did not indicate spills, leaks, inadequate aisle space, uncovered drums, blowing plastic covers, etc. The inspection forms should include these problems and the date of remediation. The inspector needs to be better trained to properly record the inspection results. Leaving sections of the form blank is not appropriate when a specific block (acceptable or not acceptable) is to be checked.

11. Waste Piles - OAC 3745-67-53 - 40 CFR 265.253
OAC 3745-67-51 - 40 CFR 265.251

The waste piles had plastic sheets with weights holding them down. The base of the piles had some exposed waste materials. These methods are not adequate to meet the requirements of these rules (i.e. protection from wind disperial and precipitation). Removal and formal closure of these waste pile areas is the best solution to this problem.

12. Part "A"

The Part "A" on file with the Ohio EPA does not accurately describe the current Master Metals facility operation. An up-dated Part "A" must be filed with the Director of the Ohio EPA.

13. Lead Furnace Slag Pile

The nonhazardous lead slag pile is immediately beside a pile of lead feed stock. The two piles intermix along one side. This could easily cause the nonhazardous slag waste to exceed the E.P. Toxic standards for lead. These two piles must be kept separated to prevent erroneous testing results. Where the materials have commingled, Master Metals should manage the mixed materials as hazardous waste.

14. Storage Bins

The three-sided storage bins were originally scheduled to have tarped tops to prevent wind dispersal and precipitation complications. Your current methods of draping thin gauge plastic over the pile within the bin seems very inefficient. Eventually the workers will leave the piles uncovered for short or long periods of time and the winds or rains will cause problems. Please consider a more efficient methods to keep the materials in the bins protected. Each bin must be labeled adequately to indicate that it contains hazardous waste so that it is clearly identified from other wastestreams.

15. Flammable Waste Stream - Ohio Revised Code 3734.02(F) - OAC 3745-66-71/40 CFR 265.171

Master Metals does not have a permit allowing acceptance of D001 (FLAMMABLE WASTES). Dozens of drums from a company named Alcolac in Sedalla, Missouri were labeled D001. Several of these drums were leaking a liquid material onto the ground. You were unable to tell me if the D001 was properly labeled. These drums could pose a very serious threat to your facility and employees. If these drums were mislabeled,, then they must be correctly labeled. If the material is flammable, then the waste material be securely containerized, properly labeled and removed to a facility licensed to handle this waste stream. It is of great concern to me that your facility accepted these drums without question. It is of further concern that they are stored in such a haphazard fashion.

16. Labeling on Containers

Several of the hazardous waste containers in storage had no labeling to indicate the contents. The wording "Hazardous Waste" was not maintained on these containers. The U.S. EPA identification number of the waste material or the name of the waste was not indicated on several of the drums.

17. Security Fence - OAC 3745-65-14 - 40 CFR 265.14

The chainlinked fence along the railroad tracks has a few areas where a child could easily crawl underneath. One area had about an 18 inch gap between the ground and the bottom of the fence. This situation should be rectified to provide better security.

18. Spillage - OAC 3745-52-11 - 40 CFR 262.11

A puddle of liquid material was noted on the ground. It was adjacent to the waste pile returned by Marks Cement. Introduction of pH paper showed a pH of at least 10 (MAXIMUM INDICATION COLOR OF THIS pH PAPER). Contact with this alkaline puddle could cause burns or blisters to on-site personnel. The source of this puddle needs to be determined and rectified to prevent future problems. The liquid also must be properly characterized and handled in accordance with applicable rules.

19. Underground Tank

A plastic lined underground cement tank was recently installed to collect acid run-off from the new battery cracking operation. I advised you to refer to the new underground tank regulations, because you appear to be in violation of secondary containment requirements. You may also need a leak detection system. U.S. EPA Region V could give you more specific guidance on the new underground tank regulations.

In summary, the Master Metals facility has shown some improvement in the past year, however, some very serious violations were found during this inspection. A copy of this letter and the RCRA Interim Status Inspection Form is being forwarded to the U.S. EPA so they may work with you in resolving your compliance problems. I advise you to correct the above listed concerns as soon as possible. If I may be of further assistance you can contact me at (216) 425-9171. Currently there is still on issue as to the regulatory status of the 2-sided bins as potential "waste piles". This issue will be addressed as part of the U.S. EPA negotiations.

Sincerely,

Mark Bergman

Mark Bergman, R.S.
Environmental Scientist
Division of Solid and Hazardous Waste
Management

MB/sp

Enclosure

cc: Dave Sholtis, DSHWM, Central Office
Catherine McCord, U.S. EPA, Region V
Ollie Zahorodny, Cleveland Fire Department
Cleveland Air Agency
Ms. Rachael Fish, OSHA

OhioEPA
Office of Ohio Environmental Protection Agency
Northeast District Office
2110 E. Aurora Road
Twinsburg, Ohio 44087
(216) 425-9171

RECEIVED
APR 23 1990
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

Richard F. Celeste
Governor

April 11, 1990

RE: MASTER METALS
CUYAHOGA COUNTY
OHD 097-613-871
GEN/TSD

CERTIFIED MAIL

Mr. Douglas Mickey
Master Metals
2850 West Third Street
Cleveland, Ohio 44113

Dear Sir:

On March 26 and 27, 1990, I conducted a hazardous waste inspection of your facility located at 2850 West Third Street in Cleveland, Ohio. Mr. Rudy Zupan, Mr. Tom Helms and you represented this facility during my inspection. The facility was inspected for compliance with Ohio Hazardous Waste Regulations. A copy of the RCRA Inspection Report is enclosed for your information. These following violations noted in my report will require prompt attention:

Description of Violation

1. **Satellite Accumulation Containers - OAC 3745-52-34**

   The baghouse dust collection containers qualify as satellite accumulation containers. Each container must be marked with the words "Hazardous Waste" or other words which identify the contents.

2. **Signs for Bins - OAC 3745-65-14**

   Each bin must have appropriate signs. The signs must indicate "Danger - Unauthorized Personnel Keep Out". Attached signs would be less likely to become unreadable due to rusting of the bin sides.

3. Contingency Plan Agreement Refusals - OAC 3745-65-37/OAC 3745-65-52

Some of the emergency service authorities did not sign documented agreements or arrangements. If they refuse to sign the written agreement then the refusal must be documented.

4. Operating Record - OAC 3745-65-73

The operating record does not include the quantities of lead contaminated fire brick, lenox waste pile or the old battery case waste pile. The operating record must be revised to include the common names of these wastestreams, the EPA Hazardous Waste Identification Number, physical state of the waste, the EPA handling codes and the physical location of each hazardous waste stored at your facility.

5. Condition of Portable Bins - OAC 3745-65-31/OAC 3745-66-73 OAC 3745-66-71

The battery waste bins did not have tarps to prevent precipitation from contacting their contents. Bin #6 had a small amount of material in the bin, however, there was no tarp over this bin. The two bins closest to the rotary furnaces had partial tarps covering their contents. The two press cake bins had a tarp over half of one bin, the other was totally unprotected from precipitation. Bin #9, which contains D008 flue dust, had a liquid leaking from two holes rusted in the side of this bin. Tom Helms admitted that the flue dust was placed in this bin when water was puddled in the bottom. Bins #6 and #9 had lead contaminated waste residues behind and beside them. Leakage from the battery cracking storage bins have created a large puddle, in a traffic area, with a ph of less than 2. All bins must be completely tarped at all times. Any uncontained residues surrounding the bins must be placed in appropriate containers and the underlying surfaces cleaned completely. The battery cracking puddle must be eliminated, including future puddling of low ph wastes. The leaking bin must be repaired or replaced and employees instructed to refrain from placing waste materials into ponded waters.

6. **Drum Storage - OAC 3745-65-31/OAC 3745-66-73/OAC 3745-66-71**

Most of your drums storing waste materials are in reasonable condition, however, some lids were missing. The kiln brick drums had brick residue several inches deep, on the skid, between the drums. This is an on-site hazardous waste generated stream which must be properly containerized. The containers which collect the new air pollution flue dust are not closed and the wind has dispersed lead contaminated dust around this area. This must be cleaned up completely and immediate steps taken to prevent this problem from continuing. One drum had fallen from the railroading loading dock onto the old railroad spur. This drum must be retrieved, inspected for integrity, repaired if necessary and placed back with the other drums.

7. **Waste Piles - OAC 3745-67-53**

Two existing waste piles remain on-site. The lenox (China Clay) is being eliminated under a consent decree schedule. The old battery case pile has a significant amount of lead residue mixed with the old battery cases. The old battery case waste pile was not covered, which left it totally exposed to precipitation. There is no control for run-on or run-off. It has not been determined if the underlying base is impermeable. Spillage from this waste pile was noted on the adjacent railroad spur area. These above mentioned violations must be addressed.

I also offer the following concerns:

8. **Labeling of Drums and Bins**

Some of the storage bins are labeled with their contents. The remaining unmarked bins should also be labeled. The on-site generated kiln bricks, (D008), are placed in used drums which have not had the labels removed from the previous generator. This is a very poor practice which could lead to unaccountability of all of these drums. It was also noted that numerous empty drums around your site maintained hazardous waste labels. The labels must be removed or totally obscured immediately after the hazardous waste contents have been removed. Master Metals must not accept any wastestreams which are shipped under a hazardous waste manifest that do not have each drum properly labeled, (i.e. Owens-Illinois).

Documentation demonstrating compliance with the above violations must be submitted to my attention at the Ohio EPA, Northeast District Office, within thirty (30) days receipt of this letter. Although we have already discussed these violations, please call me if you have questions or need assistance.

Sincerely,

Mark Bergman

Mark Bergman, R.S.
Environmental Scientist
Division of Solid and Hazardous Waste Management

MB/sp

Enclosure

cc: Carolyn Reierson, DSHWM, Central Office
Debby Berg, DSHWM, NEDO
Sheri Bianchin, U.S. EPA, Region-V

RCRA INTERIM STATUS INSPECTION FORM

Facility Name: MASTER METALS
Address: 2850 WEST THIRD ST.
CLEVELAND, OHIO 44113
County: CUYAHOGA

Date of Inspection 3/26/90
HWFB #:
USEPA ID #: OHD 097-613-871
Facility Phone #: (216) 621-2361

Facility Contact: DOUG. MICKEY
RUDY ZUPAN/TOM HELMS
Inspector(s)Name(s): MARK BERGMAN

Facility Contact Phone#: (216) 621-2361
Safety Equipment #:

STATUS
Cond. Ex. SQG___ SQG___ Generator___ Transporter___ Treatment___ Storage X Disposal___
ACTIVITIES
Containers X Tanks___ Surface Impoundments___ Incineration/Thermal treatment___
Waste pile X Land treatment___ Landfill___ Groundwater monitoring___
Used oil burner___ Hazardous waste fuel burner/blender___

		Y/N/NA	REMARK #
1.	Does the facility produce "discarded materials" as defined in 3745-51-02(A)?	N	
2.	Are they :		
	a. Abandoned(disposed;incinerated;accumulated, stored, or treated prior to disposal)?	N	
	b. Recycled?	Y	BAG HOUSE
	c. Inherently waste-like?(F020,F021,F022,F023,F026,F028)?	N	
3.	If recycled or accumulated, treated or stored before recycling, is the waste:		
	a. Used in a manner constituting disposal?	N	
	b. Burned for energy recovery?	N	
	c. Reclaimed? (Refer to Table 1 of 3745-51-02)	Y	
	d. Accumulated speculatively?	N	
4.	Is the material recycled by being:		
	a. Used or reused as an ingredient in an industrial process to make a product without prior reclamation?	Y	
	b. Used as an effective substitute for commercial products?	Y	
	c. Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock?	Y	

		Y/N/NA	REMARK #
5.	Are LDR wastes generated? If so, complete appropriate LDR checklist.	N	
6.	Has the facility submitted a Part A to Ohio?	Y	
7.	If yes, is it complete and accurate?	Y	
8.	If not accurate, has a PCR been submitted? If yes, what date was the PCR submitted?	N/A	
9.	Is the facility operating in compliance with the terms and conditions of its HWFB permit?	Y	
10.	Has the facility submitted a Part B?	Y	U.S. EPA & OHIO EPA
11.	Was advance notice of the inspection given? If so, how far in advance?	N	

REMARKS. GENERAL INFORMATION.

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

Facility is a secondary lead smelting facility. Reclaim lead with two rotary furnaces. Accept lead dross (D008) and lead baghouse dust (K069). Also reclaim battery scrap which is exempt from manifesting. Also reclaim lead scrap. Part B was submitted to U.S. EPA, however, they never got comments. Ohio EPA has called in Part B. Master Metals signed a consent decree on Jan. 18, 1990 with U.S. EPA. Facility has an elementary neutralization operation for the battery acid tank, which makes it exempt.

OAC 3745-52 GENERATOR REQUIREMENTS (40 CFR Part 262)	Y/N/NA	REMARK #
1. Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?	Y	
2. Does this facility generate any hazardous wastes that are excluded from regulation under 3745-51-04 (261.4)?	N	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment [3745-65-01] (265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit [3745-65-01] (265.1(c)(10))?	Y	ACID NEUTRALIZATION TO STP
4. Is the generator classified as a Small Quantity Generator (SQG) or conditionally exempt SQG? If so, complete appropriate checklist.	N/A	
5. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:		
a. All hazardous wastes shipped off-site have been accompanied by a completed manifest using the most recently revised USEPA form 8700-22?	N/A	NO SHIPMENTS OUT SINCE LAST OHIO EP. INSPECTION
b. The manifest form used contains all the information required by 3745-52-20 (262.20) and the minimum number of copies required by 3745-52-22 (262.22)?		
c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E) (262.20)?		
d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23(A)(1&2) (262.23)?		
e. The generator has complied with manifest exception reporting requirements in 3745-52-42 (262.42(a))?		
f. Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by 3745-52-40 (262.40)?	✓	

	Y/N/NA	REMARK #
Does the generator meet the following hazardous waste pre-transport requirements:	N/A	NO SHIPMENTS SINCE LAST OHIO EPA INSPECTION
a. Prior to offering hazardous wastes for transport off-site, the waste material is packaged, labeled, and marked in accordance with applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32] (262.30, 262.31, 262.32)?		
b. Prior to offering hazardous waste for transport off-site, each container with a capacity of 110 gallons <u>or less</u> is affixed with a completed hazardous waste label as required by 3745-52-32 (262.32)?		
c. Prior to offering hazardous wastes for transport off-site, the generator meets requirements for properly placarding or offering to properly placard for the initial transporter of the waste material in compliance with 3745-52-33 (262.33)?		
Does the generator import or export hazardous waste?	N	
If so, are the wastes handled in accordance with the requirements of 3745-52-50 (262.50)?	N/A	
If the generator elects to accumulate hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days or less</u> without a hazardous waste facility installation and operation permit as provided under 3745-52-34 (262.34), are the following requirements with respect to such accumulation met:		
a. The containers or tanks are clearly marked with the words "Hazardous Waste"?	N/A	
b. The date that accumulation began is clearly marked on each container?		
c. If the waste is accumulated in containers, the generator is complying with OAC 3745-66-71 to 3745-66-74 and 3745-66-76 to 3745-66-77? Complete <u>Management of Containers</u> checklist.		

	Y/N/NA	REMARK #
d. If the waste is accumulated in tanks, the generator is complying with OAC 3745-66-90, 3745-66-91, 3745-66-92, 3745-66-94, and 3745-66-97 to 3745-66-99 except OAC 3745-66-97(C)? Complete Storage and Treatment in Tanks checklist.	N/A	
e. If the generator accumulates waste at or near the point of generation which is under the control of the operator of the process generating the waste as allowed by 3745-52-34(C) are the following requirements met:		
1. Quantities of waste accumulated do not exceed 55 gallons at any time?	Y	
2. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?	N/A	
3. If the generator is accumulating hazardous waste in accordance with e.1 or e.2, above, has the generator marked the containers with words "Hazardous Waste" or with other words identify the contents of the container and is the generator complying with OAC 3745-55-71, 3745-55-72, 3745-55-73(A), 3745-55-76, and 3745-55-77?	N	BAG HOUSE BAGS MUST BE LABELED HAZARDOUS WASTE
4. If the generator accumulates hazardous wastes in excess of the amounts listed in either e.1 or e.2, above, did the generator comply with 3745-52-34(A) (262.34(a)) within three (3) days and mark the container holding the excess accumulation with the date the excess accumulation began accumulating?	N/A	BAGS GO DIRECTLY TO LABELED BIN
9. Has the genertor accumulated hazardous wastes in excess of ninety (90) days?	N/A	
10. Has the generator been granted an extension by the Director/ Regional Administrator for accumulation in excess of ninety (90) days?	N/A	
11. Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a USEPA identification number from the Administrator as required under 3745-52-12 (262.12)?	N/A	

		Y/N/NA	REMARK #
12.	Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) (265.16) including instruction in safe equipment operation and emergency procedures, training new employees within 6 months and providing an annual training program refresher course? [3745-52-34(A)(4)] (262.34)	Y	
13.	Does the generator keep all of the records required by 3745-65-16(D)(E) (265.16) including written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)] (262.34)	Y	
14.	Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41?	N/A	GENERATED KILN BRICKS
15.	Does the generator comply with the applicable requirements for owners or operators of hazardous waste facilities? Complete "Preparedness and Prevention" and "Contingency Plan and Emergency Procedures" checklists.	Y	

REMARKS, GENERATOR REQUIREMENTS

C 3745-65-et seq. GENERAL FACILITY STANDARDS (40 CFR Part 265, SUBPART B)

	Y/N/NA	REMARK #
Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by 3745-65-13(A)(1) (265.13(a))?	Y	
Does o/o have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. [3745-65-13(B)] (265.13(b))	Y	
a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1))	N	
b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2))	Y	

? BOTH 3A AND 3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.

Does the facility have -		
a. A 24-hour surveillance system, or	N	
b. An artificial or natural barrier <u>and</u> a means to control entry at all times [3745-65-14(B)(2)(a and b)] (265.14(b)(2))	Y	
Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. [3745-65-14(C)] (265.14(c))	N	NEED SIGNS ON MOST BINS
a. Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. [3745-65-15] (265.15)	Y	

	Y/N/NA	REMARKS
b. Are areas subject to spills (i.e., loading and unloading areas, etc.) inspection daily when in use and according to other applicable regulations when not in use. [3745-65-16(B)(4)] (265.15(b)(4))	Y	
Has the o/o provided a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course? (265.16(a)(b)(c))	Y	
Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records? (265.16(d)(e))	Y	
If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17] (265.17)		
a. Protection from sources of ignition.	N/A	
b. Physical separation of incompatible waste materials.		
c. "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.		
d. Comingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) (265.17(b)		

AC 3745-65 PREPAREDNESS AND PREVENTION (40 CFR PART 265 SUBPART C)

	Y/N/NA	REMARK #
Is the facility operated to minimize the possibilty of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] (265.31)	N	CONTINUE TO CLEAN UP MATER ON GROUND
Has there been a fire, explosion or non-planned release of waste at the facility?	N	NOT AWARE OF ANY RELEASE OFF SITE
a. If yes, has the contingency plan been implemented?	N/A	
If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)] (265.32)		
a. Internal alarm system?	Y	
b. Access to telephone, radio or other device for summoning emergency assistance?	Y	
c. Portable fire control equipment?	Y	
d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	Y	
Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary? [3745-65-33] (265.33)	Y	
If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34)	Y	
If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] (265.35)	Y	
If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards and the facility layout? [3745-65-37(A)] (265.37(a))	Y	

	Y/N/NA	REMARK #
Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3745-65-37(B)] (265.37(b))	N	MUST DOCUMENT REFUSAL

OAC 3745-65 CONTINGENCY PLAN AND EMERGENCY PROCEDURES (40 CFR PART 265 SUBPART D)

		Y/N/NA	REMARKS
1.	Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? [3745-65-52(A)(B)(C)(D)(E)] (265.52):		
a.	Actions to be taken by personnel in the event of an emergency incident?	Y	
b.	Arrangements or agreements with local or state emergency authorities?	N	ONLY. HAVE HOSPITAL SO FAR
c.	Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?	Y	
d.	A list of all emergency equipment including location, physical description and outline of capabilities?	Y	
e.	If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)] (265.52(f))?	Y	
2.	Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] (265.53)	Y	
3.	Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] (265.54)	Y	
4.	Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] (265.56)	Y	
5.	If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications deemed necessary under 3745-65-56(A-J). (265.56(a-j))	N/A	

OAC 3745-65 MANIFEST SYSTEM/RECORDS/REPORTING (40 CFR PART 265, SUBPART E)

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

		Y/N/NA	REMARK #
1.	Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) (265.73) which contains the following information:		
a.	Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)] (265.73(b)(1).	N	ON-SITE. FIRE BRICK, LENOX AND OLD BATTERY CASE PILE
b.	Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?	N	I.D. NUMBERS & PHYSICAL STATE
c.	The estimated (or actual) weight, volume or density of the waste material?	Y	
d.	A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745? (Part 265, Appendix I, Table 2)	N	EPA HANDLING CODES
e.	The present physical location of each hazardous waste within the facility?	N	PHYSICAL LOCATION
f.	Records of incidents which require implementation of the Contingency Plan?	N/A	
g.	FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document numbers? [3745-65-73(B)(2)] (265.73(b)(2))	N/A	
h.	Records of any waste analyses and trial tests required to be performed?		
i.	Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)?		
j.	Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6);(265.73(b)(6))?		

	Y/N/NA	REMARK #
k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required under OAC 3745-66 (Part 265 Subpart G)?	Y	PARTIAL CLOSURE PLAN $66,815.00
2. Has the o/o submitted an annual (bienniel) Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under 3745-65-75 (265.75)?	Y	2/20/90

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.

3. Are manifests received by the facility signed and dated?	Y	
Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)] (265.71)	Y	
a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)] (265.71(b))?	N/A	
b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) (265.72(a)) noted in writing on the manifest document.	N/A	
4. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) (265.72(b)) or has the o/o submitted the required information to the Director/Regional Administrator?	N/A	
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) (265.76) been submitted to the Director/Regional Administrator within 15 days?	N/A	

AC 3745-66 CLOSURE AND POST-CLOSURE (40 CFR PART 265, SUBPART G)

	Y/N/NA	REMARK #
. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] (265.112)?	Y	
a. A description of how each hazardous waste management unit will be closed in accordance with 265.111.	Y	
b. A description of how final closure will meet the requirements of 3745-66-11 (265.111).	Y	
c. An estimate of the maximum amount of hazardous waste ever in inventory.	Y	
d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues.	Y	
e. The year closure is expected to begin and a schedule for the various phases of closure.	Y	
f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control.	Y	
. Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)] (265.112(C))	Y	
. Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director/Regional Administrator 180 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))	Y	
. Has the closure plan (and post-closure plan, if applicable) for tank, containers storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))	Y	

		Y/N/NA	REMARK #
5.	Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)] (265.113(a))	N/A	
6.	Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)] (265.113(b))	N/A	
7.	Did the owner/operator submit to the Director/Regional Administrator, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] (265.115)	N/A	
8.	Did the owner/operator submit to the local zoning authority and the Director/Regional Administrator a survey plant in accordance with OAC 3745-66-16?	N/A	
9.	What permitted units at the facility have been closed in accordance with an approved Closure Plan?	N/A	
10.	If closure was partial, list the regulated units which remain in use at the faciilty: _____ _____		
11.	If required, has the facility prepared a written post-closure plan? [3745-66-18] (265.118)	N/A	
12.	Does the post-closure plan include:		
	a. A description of proposed ground water monitoring?	N/A	
	b. A description of planned maintenance activities?	N/A	
	c. The name, address and phone number of person/office to contact during the post-closure period?	N/A	

	Y/N/NA	REMARK #
3. For disposal facilities, has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19] (265.119)	N/A	
4. Has the owner of the property on which a disposal unit is located recorded on the deed that:		
a. The land has been used to manage hazardous waste and the type, quantity and location of waste?	N/A	
b. Land use is restricted pursuant to 3745-66-17? [3745-66-19] (265.119)	N/A	

3745-66 USE AND MANAGEMENT OF CONTAINERS (40 CFR PART 265, SUBPART I)

	Y/N/NA	REMARK #
Are hazardous wastes stored in containers which are:		SOME BINS NOT TARPED
a. Closed [3745-66-73(A)] (265.173)?	N	
b. In good condition [3745-66-71] (265.171)?	N	BIN #9 LEAKING
c. Compatible with the wastes stored in them [3745-66-72] (265.172)?	Y	
Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] (265.173(a))	Y	DRUMS
Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] (265.173(b))	Y	
Is the area where containers stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] (265.174) [documentation of inspections required under 3745-65-15 for TSDs]	Y	
Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] (265.176)	N/A	
Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] (265.177(c))	N/A	

[illegible] TREATMENT OR STORAGE IN WASTE PILES (40 CFR Part 265 SUBPART L)

	Y/N/NA	REMARK #
Waste materials which are subject to dispersal by wind have been adequately protected against such dispersal? [3745-67-51] (265.251)	Y	
If leachate or run-off from a Waste Pile is a hazardous waste, then following steps have been taken to prevent or properly manage the situation: [3745-67-53] (265.253)		
(1) The pile has been placed on an impermeable base that is compatible with the waste under conditions of treatment or storage; and	N	OLD BATTERY CASE PILE AND CHINA CLAY PILE UNKNOWN IF IMPERMEABLE
(2) A run-on control system capable of handling a 24 hr, 25-yr storm has been implemented; and	N	NO RUN-ON CONTR
(3) A run-off management system capable of controlling a 24 hr, 25-yr storm has been implemented; and	N	OLD BATTERY CASE NOT COVERED
(4) Facilities associated with run-on and run-off control systems are managed to maintain design capacity after a rain event; or	N/A	
(1) The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff; and	Y	CHINA CLAY PILE
(2) No liquids or wastes containing free liquids are placed in the pile.	Y	
No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record. [3745-67-52] (265.252)	N/A	NOT ADDING TO PILES

	[illegible]	REMARK
Are ignitable or reactive wastes not placed in waste piles unless one or both of the following conditions is met: [3745-67-56] (265.256)		
a. The addition to the pile results in a mixture which no longer meets the definition of Ignitable or Reactive under rules 3745-51-21 or 3745-51-23 and was done in compliance with the safety requirements of 3745-65-17. (265.17(b))	N/A	
b. The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction.	↓	
Are incompatible wastes, ignitable and reactive wastes placed in the waste pile only in accordance with the safety requirements of 3745-65-17? [3745-67-56 and 3745-67-57(A)] (265.256 and 265.257(a))	N/A	
Is a waste stored in a pile which is incompatible with materials stored nearby, separated or protected from them? [3745-67-57(B)] (265.257(b))	N/A	
At closure, have all waste residues and contaminated soils and structures been managed as hazardous waste? (Note: if all contaminated soils, structures, etc., cannot be removed, post-closure care as a landfill must be conducted) [3745-67-58] (265.258)	N/A	

RCRA INTERIM STATUS INSPECTION FORM

Facility Name: MASTER METALS
Address: 2550 WEST THIRD ST.
CLEVELAND, OHIO 44113
County: CUYAHOGA

Date of Inspection 31/5/89
HWFB #:
USEPA ID #: OHD 097-613-871
Facility Phone #: (216) 621-2361

Facility Contact: DOUG MICKEY
Facility Contact Phone#: (216) 621-2361
Inspector(s)Name(s): SEDA ERGUN/DAN BANASZEK MARK BERGMAN
Safety Equipment #:

STATUS
Cond. Ex. SQG___ SQG___ Generator___ Transporter___ Treatment___ Storage X Disposal___
ACTIVITIES
Containers X Tanks___ Surface Impoundments___ Incineration/Thermal treatment___
Waste pile X Land treatment___ Landfill___ Groundwater monitoring___
Used oil burner___ Hazardous waste fuel burner/blender___

	Y/N/NA	REMARK #
1. Does the facility produce "discarded materials" as defined in 3745-51-02(A)?	N	
2. Are they :		
a. Abandoned(disposed;incinerated;accumulated, stored, or treated prior to disposal)?	N	
b.Recycled?	N	
c. Inherently waste-like?(F020,F021,F022,F023,F026,F028)?	N	
3. If recycled or accumulated, treated or stored before recycling, is the waste:		
a. Used in a manner constituting disposal?	N	
b. Burned for energy recovery?	N	
c. Reclaimed? (Refer to Table 1 of 3745-51-02)	Y	
d. Accumulated speculatively?	N	
4. Is the material recycled by being:		
a. Used or reused as an ingredient in an industrial process to make a product without prior reclamation?	Y	ALL LEAD
b. Used as an effective substitute for commercial products?	Y	WASTES
c. Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock?	Y	BAGHOUSE DUST

	Y/N/NA	REMARK #
5. Are Land Disposal Restricted (LDR) wastes generated? If so, complete appropriate LDR checklist.	N	
6. Has the facility submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?	Y	
7. If yes, is it complete and accurate and does it contain all information specified in OAC 3745-50-41, -42, -43?	Y	
8. If not accurate, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51? If yes, what date was the PCR submitted.	Y	NEW PERMIT IN RESPONSE TO CAFO
9. Is the facility operating in compliance with the terms and conditions of its HWFB permit?	N/A	
10. Has the facility submitted a Part B?	Y	U.S. EPA & OHIO EPA
11. Was advance notice of the inspection given? If so, how far in advance?	Y	1 DAY

REMARKS. GENERAL INFORMATION.

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

Facility is a secondary lead smelting facility. Reclaim lead with two rotary furnaces. Accept lead dross (D008), battery manufacturer scrap (EXEMPT FROM MANIFESTING) and process used industrial batteries. Also reclaim lead scrap. Are currently accepting lead baghouse (K069) from Du Pont. Facility continues to await comments from U.S. EPA on their Part B which was submitted in March of 1986. Master Metals signed a Consent Decree with U.S. EPA on Aug. 29, 1989. Facility has an acid tank which discharges to the sewer, which makes it exempt from the tank regs. The loads of contaminated soil from the Marks Cement site were manifested off-site to Wayne Disposal in early 1989.

C 3745-52 GENERATOR REQUIREMENTS (40 CFR Part 262)	Y/N/NA	REMARK #
1. Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?	Y	
2. Does this facility generate any hazardous wastes that are excluded from regulation under 3745-51-04 (261.4)?	N	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment [3745-65-01] (265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit [3745-65-01] (265.1(c)(10))?	Y	ACID NEUTRALIZATION TO STP
4. Is the generator classified as a Small Quantity Generator (SQG) or conditionally exempt SQG? If so, complete appropriate checklist.	N/A	STORER
5. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:		
a. All hazardous wastes shipped off-site have been accompanied by a completed manifest using the most recently revised USEPA form 8700-22?	Y	
b. The manifest form used contains all the information required by 3745-52-20 (262.20) and the minimum number of copies required by 3745-52-22 (262.22)?	Y	
c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E) (262.20)?	Y	
d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23(A)(1&2) (262.23)?	Y	
e. The generator has complied with manifest exception reporting requirements in 3745-52-42 (262.42(a))?	N/A	
f. Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by 3745-52-40 (262.40)?	Y	

	Y/N/NA	REMARK #
6. Does the generator meet the following hazardous waste pre-transport requirements:	N/A	
a. Prior to offering hazardous wastes for transport off-site, the waste material is packaged, labeled, and marked in accordance with applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32] (262.30, 262.31, 262.32)?	N/A	CONTAMINATED SOIL
b. Prior to offering hazardous waste for transport off-site, each container with a capacity of 110 gallons <u>or less</u> is affixed with a completed hazardous waste label as required by 3745-52-32 (262.32)?	N/A	
c. Prior to offering hazardous wastes for transport off-site, the generator meets requirements for properly placarding or offering to properly placard for the initial transporter of the waste material in compliance with 3745-52-33 (262.33)?	N/A	
7. Does the generator import or export hazardous waste?	N	
If so, are the wastes handled in accordance with the requirements of 3745-52-50 (262.50)?	N/A	
8. If the generator elects to accumulate hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days or less</u> without a hazardous waste facility installation and operation permit as provided under 3745-52-34 (262.34), are the following requirements with respect to such accumulation met:		
a. The containers or tanks are clearly marked with the words "Hazardous Waste"?	N/A	
b. The date that accumulation began is clearly marked on each container?	N/A	
c. If the waste is accumulated in containers, the generator is complying with OAC 3745-66-70 to 3745-66-77? Complete <u>Management of Containers</u> checklist.	N/A	

	Y/N/NA	REMARK #
d. If the waste is accumulated in tanks, the generator is complying with OAC 3745-66-90, to 3745-66-992 except OAC 3745-66-97(C) and 3745-66-991? Complete Storage and Treatment in Tanks checklist.	N/A	
e. If the generator accumulates waste at or near the point of generation which is under the control of the operator of the process generating the waste as allowed by 3745-52-34(C) are the following requirements met:		
1. Quantities of waste accumulated do not exceed 55 gallons at any time?	N/A	
2. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?	N/A	
3. If the generator is accumulating hazardous waste in accordance with e.1 or e.2, above, has the generator marked the containers with words "Hazardous Waste" or with other words identify the contents of the container and is the generator complying with OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76, and 3745-66-77?	N/A	
4. If the generator accumulates hazardous wastes in excess of the amounts listed in either e.1 or e.2, above, did the generator comply with 3745-52-34(A) (262.34(a)) within three (3) days and mark the container holding the excess accumulation with the date the excess accumulation began accumulating?	N/A	
9. Has the generator accumulated hazardous wastes in excess of ninety (90) days?	Y	CONTAMINATED SOIL
10. Has the generator been granted an extension by the Director/ Regional Administrator for accumulation in excess of ninety (90) days?	N/A	
11. Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a USEPA identification number from the Administrator as required under 3745-52-12 (262.12)?	N	

		Y/N/NA	REMARK #
12.	Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) (265.16) including instruction in safe equipment operation and emergency procedures, training new employees within 6 months and providing an annual training program refresher course? [3745-52-34(A)(4)] (262.34)	Y	
13.	Does the generator keep all of the records required by 3745-65-16(D)(E) (265.16) including written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)] (262.34)	Y	
14.	Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41?	Y	
15.	Does the generator comply with the applicable requirements for owners or operators of hazardous waste facilities? Complete "Preparedness and Prevention" and "Contingency Plan and Emergency Procedures" checklists.		

REMARKS, GENERATOR REQUIREMENTS

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS (40 CFR Part 265, SUBPART B)

		Y/N/NA	REMARK #
1.	Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by 3745-65-13(A)(1) (265.13(a))?	N	
2.	Does o/o have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. [3745-65-13(B)] (265.13(b))	Y	
3. a.	Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1))	N	
b.	Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2))	Y	

IF BOTH 3A AND 3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.

4.	Does the facility have -		
a.	A 24-hour surveillance system, or	Y	
b.	An artificial or natural barrier and a means to control entry at all times [3745-65-14(B)(2)(a and b)] (265.14(b)(2))	Y	
5.	Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. [3745-65-14(C)] (265.14(c))	Y	
6. a.	Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. [3745-65-15] (265.15)	Y	

	Y/N/NA	REMARK #
b. Are areas subject to spills (i.e., loading and unloading areas, etc.) inspection daily when in use and according to other applicable regulations when not in use. [3745-65-16(B)(4)] (265.15(b)(4))	Y	
7. Has the o/o provided a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course? (265.16(a)(b)(c))	Y	
8. Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records? (265.16(d)(e))	Y	
9. If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17] (265.17)		
a. Protection from sources of ignition.	N/A	
b. Physical separation of incompatible waste materials.	N/A	
c. "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	N/A	
d. Comingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) (265.17(b)	N/A	

OAC 3745-65 PREPAREDNESS AND PREVENTION (40 CFR PART 265 SUBPART C)

		Y/N/NA	REMARK #
1.	Is the facility operated to minimize the possibilty of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] (265.31)	Y	
2.	Has there been a fire, explosion or non-planned release of waste at the facility?	N	
	a. If yes, has the contingency plan been implemented?	N/A	
3.	If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)] (265.32)		
	a. Internal alarm system?	Y	
	b. Access to telephone, radio or other device for summoning emergency assistance?	Y	
	c. Portable fire control equipment?	Y	
	d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	Y	
4.	Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary? [3745-65-33] (265.33)	Y	
5.	If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34)	Y	
6.	If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] (265.35)	Y	
7.	If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards and the facility layout? [3745-65-37(A)] (265.37(a))	Y	

	Y/N/NA	REMARK #
8. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3745-65-37(B)] (265.37(b))	N	NEED DOCUMENT REFUSAL

OAC 3745-65 CONTINGENCY PLAN AND EMERGENCY PROCEDURES (40 CFR PART 265 SUBPART D)

		Y/N/NA	REMARK #
1.	Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? [3745-65-52(A)(B)(C)(D)(E)] (265.52):		
	a. Actions to be taken by personnel in the event of an emergency incident?	Y	
	b. Arrangements or agreements with local or state emergency authorities?	N	
	c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?	Y	
	d. A list of all emergency equipment including location, physical description and outline of capabilities?	Y	
	e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)] (265.52(f))?	Y	
2.	Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] (265.53)	Y	
3.	Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] (265.54)	Y	
4.	Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] (265.56)	Y	
5.	If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications deemed necessary under 3745-65-56(A-J). (265.56(a-j))	N/A	

OAC 3745-65 MANIFEST SYSTEM/RECORDS/REPORTING (40 CFR PART 265, SUBPART E)

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

		Y/N/NA	REMARK #
1.	Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) (265.73) which contains the following information:		
a.	Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)] (265.73(b)(1).	Y	
b.	Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?	Y	
c.	The estimated (or actual) weight, volume or density of the waste material?	Y	
d.	A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745? (Part 265, Appendix I, Table 2)	Y	
e.	The present physical location of each hazardous waste within the facility?	Y	
f.	Records of incidents which require implementation of the Contingency Plan?	N/A	
g.	FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document numbers? [3745-65-73(B)(2)] (265.73(b)(2))	N/A	
h.	Records of any waste analyses and trial tests required to be performed?	Y	
i.	Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)?	Y	
j.	Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6);(265.73(b)(6))?	N/A	

	Y/N/NA	REMARK #
k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required under OAC 3745-66 (Part 265 Subpart G)?	Y	
2. Has the o/o submitted an annual (bienniel) Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under 3745-65-75 (265.75)?	Y	
NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.		
3. Are manifests received by the facility signed and dated?	Y	
Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)] (265.71)	Y	
a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)] (265.71(b))?	N/A	
b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) (265.72(a)) noted in writing on the manifest document.	Y	
4. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) (265.72(b)) or has the o/o submitted the required information to the Director/Regional Administrator?	N/A	
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) (265.76) been submitted to the Director/Regional Administrator within 15 days?	N/A	

OAC 3745-66 CLOSURE AND POST-CLOSURE (40 CFR PART 265, SUBPART G)

		Y/N/NA	REMARK #
1.	Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] (265.112)?	Y	
	a. A description of how each hazardous waste management unit will be closed in accordance with 265.111.	N	CURRENTLY BEING REVISED
	b. A description of how final closure will meet the requirements of 3745-66-11 (265.111).	N	ALSO BEING REVISED
	c. An estimate of the maximum amount of hazardous waste ever in inventory.	N	TO BE REVISED
	d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues.	N	TO BE REVISED
	e. The year closure is expected to begin and a schedule for the various phases of closure.	N	TO BE REVISED
	f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control.	N	TO BE REVISED
2.	Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)] (265.112(C))	N/A	CONSENT DECREE
3.	Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director/Regional Administrator 180 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))	N	WILL BE SUBMITTED IN NEAR FUTURE
4.	Has the closure plan (and post-closure plan, if applicable) for tank, containers storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))	N/A	

		Y/N/NA	REMARK #
5.	Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)] (265.113(a))	N/A	
6.	Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)] (265.113(b))	N/A	
7.	Did the owner/operator submit to the Director/Regional Administrator, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] (265.115)	N/A	
8.	Did the owner/operator submit to the local zoning authority and the Director/Regional Administrator a survey plant in accordance with OAC 3745-66-16?	N/A	
9.	What permitted units at the facility have been closed in accordance with an approved Closure Plan?	N/A	
10.	If closure was partial, list the regulated units which remain in use at the faciilty: N/A		
11.	If required, has the facility prepared a written post-closure plan? [3745-66-18] (265.118)	N/A	
12.	Does the post-closure plan include:		
	a. A description of proposed ground water monitoring?	N/A	
	b. A description of planned maintenance activities?	N/A	
	c. The name, address and phone number of person/office to contact during the post-closure period?	N/A	

	Y/N/NA	REMARK #
13. For disposal facilities, has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19] (265.119)	N/A	
14. Has the owner of the property on which a disposal unit is located recorded on the deed that:		
a. The land has been used to manage hazardous waste and the type, quantity and location of waste?	N/A	
b. Land use is restricted pursuant to 3745-66-17? [3745-66-19] (265.119)	N/A	

OAC 3745-67 TREATMENT OR STORAGE IN WASTE PILES (40 CFR Part 265 SUBPART L)

		Y/N/NA	REMARK #
1.	Waste materials which are subject to dispersal by wind have been adequately protected against such dispersal? [3745-67-51] (265.251)	Y	
2.	If leachate or run-off from a Waste Pile is a hazardous waste, then following steps have been taken to prevent or properly manage the situation: [3745-67-53] (265.253)		
a. (1)	The pile has been placed on an impermeable base that is compatible with the waste under conditions of treatment or storage; and	N	ON CONCRETE CAN NOT SHOW IMPERMEAB
(2)	A run-on control system capable of handling a 24 hr, 25-yr storm has been implemented; and	N	NO RUN-ON PROTECTION
(3)	A run-off management system capable of controlling a 24 hr, 25-yr storm has been implemented; and	N	NO RUN-OFF
(4)	Facilities associated with run-on and run-off control systems are managed to maintain design capacity after a rain event; or	N/A	
b. (1)	The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff; and	Y	TARP
(2)	No liquids or wastes containing free liquids are placed in the pile.	Y	
3.	No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record. [3745-67-52] (265.252)	Y	

	Y/N/NA	REMARK #

4. Are ignitable or reactive wastes not placed in waste piles unless one or both of the following conditions is met: [3745-67-56] (265.256)
   a. The addition to the pile results in a mixture which no longer meets the definition of Ignitable or Reactive under rules 3745-51-21 or 3745-51-23 and was done in compliance with the safety requirements of 3745-65-17. (265.17(b)) N/A _____
   b. The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction. N/A _____

5. Are incompatible wastes, ignitable and reactive wastes placed in the waste pile only in accordance with the safety requirements of 3745-65-17? [3745-67-56 and 3745-67-57(A)] (265.256 and 265.257(a)) N/A _____

6. Is a waste stored in a pile which is incompatible with materials stored nearby, separated or protected from them? [3745-67-57(B)] (265.257(b)) N/A _____

7. At closure, have all waste residues and contaminated soils and structures been managed as hazardous waste? (Note: if all contaminated soils, structures, etc., cannot be removed, post-closure care as a landfill must be conducted) [3745-67-58] (265.258) N/A _____

OAC 3745-66 USE AND MANAGEMENT OF CONTAINERS (40 CFR PART 265, SUBPART I)

		Y/N/NA	REMARK #
1.	Are hazardous wastes stored in containers which are:		
	a. Closed [3745-66-73(A)] (265.173)?	Y	
	b. In good condition [3745-66-71] (265.171)?	N	
	c. Compatible with the wastes stored in them [3745-66-72] (265.172)?	Y	
2.	Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] (265.173(a))	Y	
3.	Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] (265.173(b))	N	
4.	Is the area where containers stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] (265.174) [documentation of inspections required under 3745-65-15 for TSDs]	Y	
5.	Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] (265.176)	N/A	
6.	Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] (265.177(c))	N/A	

ENVISAGE ENVIRONMENTAL INCORPORATED
P. O. Box 152, Richfield, Ohio 44286
Phone (216) 526-0990

REPORT NO. #2 88-1607
COMPANY Master Metals
TITLE Response Report
DATE 11-4-88

MASTER METALS INC.
2850 WEST THIRD STREET
CLEVELAND, OHIO

RESPONSE REPORT

SUBMITTED - NOVEMBER 1988

RECEIVED
NOV 10 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Envisage Environmental Incorporated P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

November 4, 1988

Mr. Mark Bergman
OEPA
Division of Solid and Hazardous Waste
2110 East Aurora road
Twinsburg, Ohio. 44113

Dear Mr. Bergman:

Enclosed you will find the response to the comments you had stated in your letter dated September 30, 1988.

I trust you will find these reponses satisfactory. The Master Metals facility is working very diligently to correct any problems that may exist at the facility, however steady progress is the goal. For purposes of ease, I suggest that you review the original stipulation agreement that was signed in September 1987 and the draft consent decree, that is currently under negotiation with the USEPA. Please feel free to call me with any questions during office hours at the telephone number above.

Sincerely,

Seda Ergun
Regulatory Compliance Manager
ENVISAGE ENVIRONMENTAL INC.

cc: Dave Sholtis, DSHWM, Central Office
Catherine McCord, USEPA, Region V
Michael Cyphert esq.
Douglas Mickey

MASTER METALS
2850 WEST THIRD STREET
CLEVELAND, OHIO.

RESPONSE REPORT

11-02-88

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

OEPA Listed Citation 1 and 2, 40 CFR 265.13

A new waste analysis plan has been written for the Master Metals facility. The new plan is enclosed for your review. All past data from the survey forms and/or additional analysis of incoming wastes is on file and ready for your review at any time. In the waste analysis plan you can see that there exists a form that is sent to all clients of Master Metals. There also exists a time table for in-house comparison of these waste streams. Since the facility mainly accepts D008 and only a small quantity of K069, the emphasis of the plan is on the analysis of D008 for any possible undesirable contaminants. Also included in the plan is a flow chart and rational as when to refuse a shipment of waste.

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WASTE ANALYSIS PROGRAM

I. Flow Chart Overview of waste analysis Plan

II. Facility Permit of incoming Wastes
   a. generators waste survey form
   b. request for waste analysis from generator

III. Inspection of incoming wastes
   a. responsibility
   b. parameters to look for
   c. step-by-step

IV. Test Parameters
   a. waste to test description chart

V. Frequency of Waste Analysis
   a. regular clients
   b. irregular clients
   c. new clients
   d. one-time clients

VI. Discrepancy of Analysis
   a. discrepancy from waste survey
   b. discrepancy from manifest
   c. discrepancy from visual inspection

VII. TSDF Standards for Waste Identification
   a. identification and tracking system
      i. waste tracking form
   b. sampling method of waste identification

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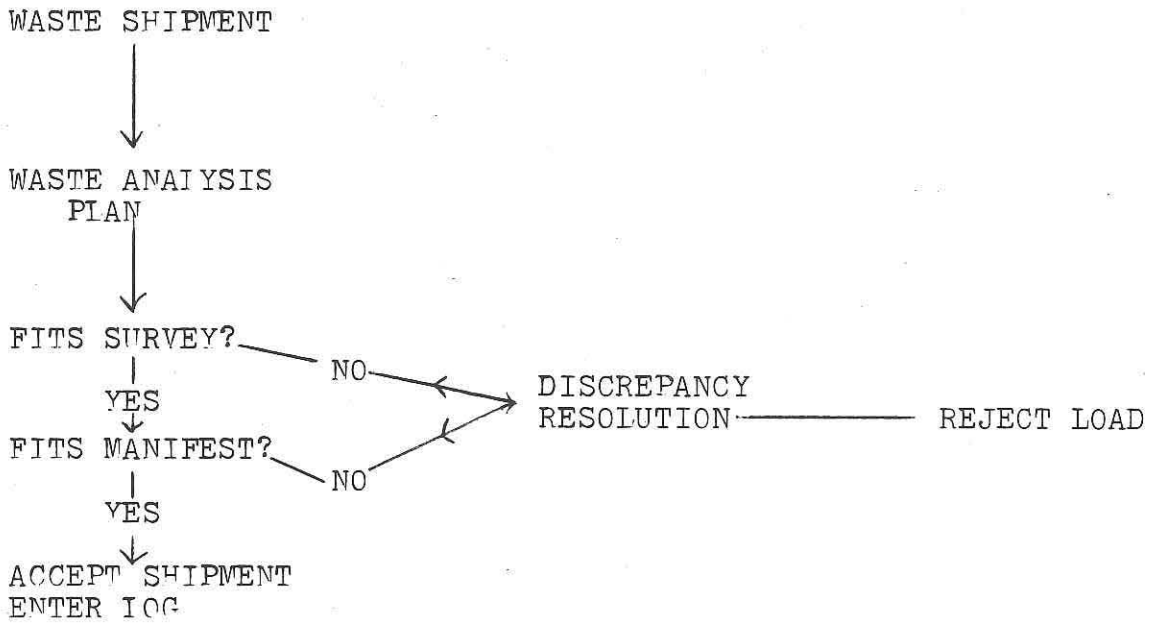
I.

WASTE ANALYSIS PLAN FLOW CHART
PREPARED FOR MASTER METALS INC.

The waste analysis plan for any TSD facility is an internal check to see that what waste a company receives is in fact what it is supposed to be. The analysis must confirm what is on the manifest that accompanies it.



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II. Facility Permit of incoming wastes.

Currently the Master Metals facility is permitted to only receive hazardous waste designated as D008 and K069. The EPA hazardous waste number D008, is waste that is hazardous because it contains the leachable form of Lead. Similarly, K069 is designated hazardous because it is emission control dust bearing lead, from secondary lead smelting operations. Master Metals is a secondary lead smelter and the facility is permitted to receive and use K069 that is produced at the plant.

Waste analysis will be conducted at the Master Metals facility for incoming wastes. On occasion, the facility will need to reconfirm the wastes that are being shipped to Master Metals. For this a waste survey form is included. Master Metals should employ this form:

1) for new clients that ship waste to your plant
2) periodically (every 6 months) for clients that ship waste to your plant on a regular basis
3) when you have reason to believe that a client has changed their waste producing process
4) when the waste received does not match the manifest (Master Metals is only allowed to accept D008 and K069 wastes)
5) as a spot check on any waste material

Enclosed is a sample letter that should be sent to any facility that ships hazardous waste to the Master Metals facility.

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

MASTER METALS, INC., 2850 W. THIRD ST., CLEVELAND, OHIO 44113 • (216) 621-2361

Lead Smelter and Refiner

Dear Sir/Madame:

Enclosed you will find a copy of our waste analysis survey form. Please fill out all sections of this form and include any pertinent data about the waste you are proposing to send to the Master Metals facility. We are required by law to have this information. Please note that you may be required to provide this information periodically in the future as an internal check for our company.

In addition, please notify us, in writing, anytime you change your waste generating process and/or if you are proposing to send Master Metals any new types of hazardous waste. If you have any questions do not hesitate to call during office hours at the telephone number above.

Sincerely,

The Management
Master Metals Inc.

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

WASTE SURVEY FORM

This Waste Survey Form is required to be completed by Generators of waste materials transported to Master Metals for reclamation.

GENERAL INFORMATION:

Customer Name:_____ EPA ID #:_____

Contact Person:_____ Telephone #:_____

Facility Address:_____ Mailing Address:_____

_____ _____

WASTE STREAM INFORMATION:

Common Name of Waste:_____

Process Generating Waste:_____

Is material a RCRA Hazardous Waste per 40CFR Part 261? Yes No

If YES.....EPA Hazardous Waste Code(s):_____
State Codes(if applicable):_____

Explain:_____

Is this waste "a material that is not one of the primary products of a production process and is not solely or separately produced by the production process", as defined in 40CFR Part 261.1(c)(3) as a "by-product"? .....Yes No

Is the waste "a material that has been used and as a result of contamination can no longer serve the purpose for which it was produced without further processing", as defined in 40CFR Part 261.1(c)(1) as a "spent material"? ....Yes No

Amt Generated:_____ Tons / Cu yds / drum PER week / month / quarter

Will the waste material be consistent throughout the year?...Yes No

SHIPPING INFORMATION:

Is waste a DOT Hazardous Material? Yes No

Proper Shipping Name:_____ RQ:_____

Hazard Class:_____ UN/NA #:_____

Shipping Method: Bulk____ Drums____ Type/Size:_____

Frequency: one-time / daily / weekly / monthly / quarterly / yearly

Special Handling Information:_____

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WASTE SURVEY FORM(continued)

PHYSICAL CHARACTERISTICS OF WASTE:

Color:_____ Odor: none mild strong Describe:_____

Physical State: ___solid ___sludge ___powder ___liquid

Layers: ___multilayered ___bilayered ___homogeneous

pH Value: direct measurement_____ of 10% solution_____

Weight of Material: _____ pounds / tons PER cu ft / cu yd

Does material react(ie: temp increase, gas release, explosion) when contact with water occurs? _____

WASTE COMPOSITION:

_____	_____%
_____	_____%
_____	_____%
_____	_____%
_____	_____%
_____	_____%
Total	100 %

CHEMICAL ANALYSIS:

Metals:(include units)	Direct Analysis	EP Toxicity
Arsenic (As)	_____	_____
Barium (Ba)	_____	_____
Cadmium (Cd)	_____	_____
Chromium(Cr)	_____	_____
Mercury (Hg)	_____	_____
Lead (Pb)	_____	_____
Selenium(Se)	_____	_____
Silver (Ag)	_____	_____
Antimony(Sb)	_____	
Bismuth (Bi)	_____	
Copper (Cu)	_____	
Nickel (Ni)	_____	
Tin (Sn)	_____	
Zinc (Zn)	_____	
Other_____	_____	

Is the above information based upon laboratory analysis of a sample of the waste stream? Yes No If yes, provide analysis date_____

CERTIFICATION:

I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS DOCUMENT AND ALL ATTACHED DOCUMENTS IS COMPLETE, ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.

_____ _____

Authorized Signature Title

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

III. Inspection of incomming wastes

All incomming wastes will be inspected by a designated employee of Master Metals. This person is trained in proper manifesting and labeling of hazardous waste. If any discrepancies evolve in the inspection, the shipment will be returned to the generator and the waste will not be accepted. The following is a step by step procedure to be followed when waste is shipped to Master Metals.

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WASTE ANALYSIS PROGRAM

Each hazardous waste material sent to the Master Metals facility must receive approval prior to the first shipment. The generator is required to complete and submit the "Waste Profile Form".

The information contained on this form is important for the identification and verification of waste materials arriving at the facility. The information contained on this form includes:

* General Information: Information about generator, including facility/mailing addresses and EPA ID #.

* Waste Stream Information: Information about the process generating the waste, generation rate and regulatory status.

* Shipping Information: The DOT classification on the manifest will assist in verifying the shipment material type. Other information includes container type, shipping frequency, and special handling.

* Physical Characteristics: Physical characteristics, such as color, odor, physical state, weight and pH of a 10% solution are parameters that can be verified upon arrival of the shipment.

* Waste Composition: This analysis, as provided by the generator, will assist Master Metals personnel with evaluating the material for reclamation at the facility.

* Chemical Analysis: The direct analysis of metal content of the waste material is important for the verification of waste composition of the waste received from each hazardous waste generator. Also, the EP Toxicity results will provide verification of the regulatory status of the material as a characteristic hazardous waste (for metals).

The Physical Characteristics, Waste Composition and Chemical Analysis categories are important aspects of verifying the consistency of waste materials arriving from each individual generator. A new analysis will be performed by the generator if the waste material changes for any reason or under the conditions that appear on page 2 of this document

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The following procedure will be followed upon arrival of hazardous waste shipments at the Master Metals facility:

1) A representative sample of all arriving shipments of manifested hazardous waste is obtained by laboratory personnel.
   Samples will be obtained via ASTM methods-see appendix
   The sample is labelled with the information which will identify the shipment, such as; Date, Generator Name, Manifest Number and Receiving Number. The representative samples are saved for 1 year.

2) The arriving shipment is assigned an internal "Receiving Number".

   The Receiving Number is an internal numbering system unique to each shipment arriving at the facility. Each arriving container in the shipment is labelled with this Receiving Number, therefore providing internal identification of each container. The Receiving Number is also recorded on the shipping paperwork/manifest, Laboratory Analysis Records and the Operating Record.

3) The quantity of material in each shipment is verified, as stated on the Uniform Hazardous Waste Manifest.

   This verification is accomplished by obtaining either; the exact drum count, or the shipment weights(full and empty) in order to calculate the exact amount of material arriving in bulk shipments.

4) The arriving material is inspected by the laboratory personnel.

   Inspection of the arriving hazardous waste material includes the physical inspection, such as color, odor, physical state and pH of a 10% solution. The results of this inspection can be compared with the Waste Survey Form and past shipment history, in order to verify the consistency of shipment material.

   If necessary, arriving shipments of hazardous waste material are analyzed for Lead, Antimony, Copper, Tin, Nickel and Zinc contents. These are the most important parameters when evaluating waste materials for reclamation and verifying the type and consistency of waste materials received from generators.
   The results will be recorded on the "Arriving Shipment Analysis Form", and compared to the information on the Waste Survey Form.

   If arriving waste materials; do not conform to the generator analysis, appear to be "different" from typical wastes, or are not acceptable for reclamation at the facility, the generator is notified in order to clarify the situation and determine the status of the future shipments.
   Any discrepancy in material composition, shipment weight or drum count is noted in the discrepancy space on Waste Manifest.

5) The Uniform Hazardous Waste Manifest is signed only by personnel trained in the Manifesting Procedures and the significance of all required information.

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IV.

PARAMETERS
WASTE ANALYSIS PROGRAM

On every shipment of waste material to the Master Metals facility that is deemed to be inspected per the waste analysis the following should be conducted:

FOR D008 AND K069

PARAMETERS	TEST METHOD	RESULT
Arsenic Barium Cadmium Chromium Lead Mercury Selenium Silver	EP TOXICITY	only accept material that is above Federal Limits for Lead concentration
Ph	standard	accept only waste that is >2 or <12.5 Ph su if it is an aqueous sol.

NOTE: For scrap chips, turnings or any material that looks to be oily, solvent smelling or like it came from a metals working shop, a full chlorinated solvent scan should be conducted periodically to insure that the waste is not contaminated with chlorinated solvents.

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V.

FREQUENCY OF WASTE ANALYSIS

Client_____	frequency of waste analysis (in-house)
regular clients (ship waste regularly)	minimum every six months
irregular clients	minimum every six months or every other shipment
new clients	first two shipments and treat as above client depending on status.
one time clients	every shipment-or ask them to provide analysis with every shipment

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VI.

Discrepancy of Waste

If at any time the inspector finds that the shipment does not match the description of the waste on the waste survey form, first conduct your own analysis or reject the waste and do not receive it.

If at any time the inspector does not agree with the quantity of the waste, then fill in the discrepancy section of the manifest.

If at any time the inspector notices that the labeling does not fit the manifest description or the visual inspection a judgement call must be made such as calling the generator for clarification.

Most discrepancies can be clarified by calling the generator. If in doubt, call the generator first to avoid costly analysis and/or problems of sending the waste back.

VII.

TSDF Standards for Waste Identification

A method for tracking all the wastes accepted at Master Metals must be adopted. Each waste shipped into the facility must be tracked to its eventual disposal into the furnace. The manifest number or the operating log number can be used as an identification to track the wastes. This number should be written on the drums as they are received on-site. As the drums and/or boxes are put in the furnace the number should be recorded on the furnace log. This will enable Master Metals to track the date that any shipment was disposed of.

Appendix

ASTM METHOD OF TESTING GROSS SAMPLE OF COAL----FOR SAMPLING K069

ASTM METHOD OF SAMPLING SOIL----FOR SAMPLING D008 (DROSS)

Standard Methods for COLLECTION OF A GROSS SAMPLE OF COAL[1]

This standard is issued under the fixed designation D 2234; the number immediately following the designation indicates the year of original adoption or, in the case of revision, the year of last revision. A number in parentheses indicates the year of last reapproval. A superscript epsilon (ε) indicates an editorial change since the last revision or reapproval.

INTRODUCTION

Data obtained from coal samples are used in establishing price, controlling mine and cleaning plant operations, allocating production costs, and determining plant or component efficiency. The task of obtaining a sample of reasonable weight to represent an entire lot presents a number of problems and emphasizes the necessity for using standard sampling procedures.

Coal is one of the most difficult of materials to sample, varying in composition from noncombustible particles to those which can be burned completely, with all gradations in between. The task is further complicated by the use of the analytical results, the sampling equipment available, the quantity to be represented by the sample, and the degree of precision required.

These standard methods give the overall requirements for the collection of coal samples. The wide varieties of coal handling facilities preclude the publication of detailed procedures for every sampling situation. The proper collection of the sample involves an understanding and consideration of the physical character of the coal, the number and weight of increments, and the over-all precision required.

1. Scope

1.1 These methods cover procedures for the collection of a gross sample under various conditions of sampling. The gross sample is to be crushed and further prepared for analysis in accordance with Method D 2013.[2] However, the procedures for dividing large gross samples before any crushing are given in this standard.

1.2 These methods describe general and special purpose sampling procedures for coals (*1*) by size and condition of preparation (for example, mechanically cleaned coal or raw coal) and (*2*) by sampling characteristics.

2. Applicable Documents

2.1 *ASTM Standards:*

D 431 Methods for Designating the Size of Coal from Its Sieve Analysis[2]

D 2013 Method of Preparing Coal Samples for Analysis[2]

E 177 Recommended Practice for Use of the Terms Precision and Accuracy as Applied to Measurement of a Property of a Material[3]

3. Summary of Methods

3.1 General-purpose sampling procedures are intended to provide a precision of ±1/10 of the ash content of the coal sampled in 95 out of 100 cases. To obtain a stated precision in terms of other constituents, the special purpose sampling procedures should be used.

3.2 Special purpose sampling procedures apply to the sampling of coal when other precision limits are required, or when other constituents

[1] These methods are under the jurisdiction of ASTM Committee D-5 on Coal and Coke and are the direct responsibility of Subcommittee D05.23 on Sampling.

Current edition approved Sept. 27, 1982. Published November 1982. Originally published as D 2234 – 63 T. Last previous edition D 2234 – 76.

[2] *Annual Book of ASTM Standards*, Vol 05.05.

[3] *Annual Book of ASTM Standards*, Vol 14.02.

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are used to specify precision, or for performance tests.

3.3 For coals of known size and condition of preparation, tables are given for the determination of the number and weight of increments required for a gross sample for both general and special purpose sampling. For coals having known sampling characteristics, as determined by the use of appropriate test and statistical procedures given in these methods, the number and weight of the increments required for either general purpose or special purpose precision can be determined.

3.4 The procedures appear in the following order:

Method	Section
Sampling of Coals Based on Size and Condition of Preparation	7
General-Purpose Sampling Procedure	7.1
Number and Weight of Increments	7.1.2
Number of Gross Samples	7.1.4
Special-Purpose Sampling Procedure	7.2
Number and Weight of Increments	7.2.2
Number of Gross Samples	7.2.3
Sampling of Coals Based on Known Sampling Characteristics	8
Principles of Sampling by Sampling Characteristics	8.1
General Purpose Sampling Procedure	8.2
Number and Weight of Increments	8.2.1
Number of Gross Samples	8.2.2
Special Purpose Sampling Procedure	8.3
Number and Weight of Increments and Number of Gross Samples	8.3.2
Division of the Gross Samples Before Crushing	9
Sampling of Coal for Moisture Determination	10
Types of Moisture Samples	10.1
Entire Gross Samples	10.1.1
Special Moisture Subsamples	10.1.2
Other Subsamples for Moisture Testing	10.1.3
Special Precautions	10.2
Weight of Increments	10.3
Number of Increments	10.4
Moisture Sampling Based on Known Sampling Characteristics	10.4.1
Moisture Sampling Based Only on Size	10.4.2

4. Definitions

4.1 *accuracy:*

4.1.1 generally, a term used to indicate the reliability of a sample, a measurement, or an observation.

4.1.2 specifically, a measure of closeness of agreement between an experimental result and the true value. Example: the observed and true sulfur content of a coal consignment. This measure is affected by change errors as well as by bias.

4.2 *air drying*—a process of partial drying of coal to bring it near to equilibrium with the atmosphere in the room in which further reduction and division of the sample is to take place.

4.3 *analysis sample*—final subsample prepared from the original gross sample but reduced to 100 % through No. 60 (250-μm) sieve and divided to not less than 50 g.

4.4 *bias (systematic error)*—an error that is consistently negative or consistently positive. The mean of errors resulting from a series of observations which does not tend towards zero.

4.5 *chance error*—error that has equal probability of being positive or negative. The mean of the chance errors resulting from a series of observations tends toward zero as the number of observations approaches infinity.

4.6 *consignment*—a discrete amount of coal such as a shipment, a carload, a unit train, or a day's production. A consignment may include more than one lot of coal and may correspond to a specified period of time such as sampling period or billing period.

4.7 *error*—difference of an observation or a group of observations from the best obtainable estimate of the true value.

4.8 *free impurity*—the impurities in a coal that exist as individual discrete particles that are not a structural part of the coal and that can be separated from it by coal preparation methods.

4.9 *gross sample*—a sample representing one lot of coal and composed of a number of increments on which neither reduction nor division has been performed.

4.10 *increment*—a small portion of the lot collected by one operation of a sampling device and normally combined with other increments from the lot to make a gross sample.

4.11 *inherent ash*—the residue remaining from the inherent impurities after ignition under conditions specified for the ash determination.

4.12 *inherent impurity*—the inorganic material in coal that is structurally part of the coal and cannot be separated from it by coal preparation methods.

4.13 *lot*—a quantity of coal to be represented by a gross sample.

4.14 *precision*—a term used to indicate the capability of a person, an instrument, or method to obtain reproducible results; specifically, a measure of the chance error as expressed by the variance, the standard error, or a multiple of the standard error (see Recommended Practice E 177).

4.15 *representative sample*—a sample collected in such a manner that every particle of the lot to be sampled is equally represented in the gross sample.

4.16 *sample*—a quantity of material taken from a larger quantity for the purpose of estimating properties or composition of the larger quantity.

4.17 *sample division*—the process whereby a sample is reduced in weight without change in particle size.

4.18 *sample preparation*—the process that may include air drying, crushing, division, and mixing of a gross sample for the purpose of obtaining an unbiased analysis sample.

4.19 *significant loss*—any loss that introduces a bias in final results that is of appreciable economic importance to the concerned parties.

4.20 *size consist*—the particle size distribution of a coal.

4.21 *standard deviation*—the square root of variance.

4.22 *subsample*—a sample taken from another sample.

4.23 *systematic error* (see 4.4 *bias*)

4.24 *top size*—the opening of the smallest sieve in the series upon which is retained less than 5 % of the sample (see Method D 431).

4.25 *unbiased sample (representative sample)*—a sample free of bias.

4.26 *variance*—the mean square of deviations (or errors) of a set of observations; the sum of squared deviations (or errors) of individual observations with respect to their arithmetic mean divided by the number of observations less one (degrees of freedom); square of the standard deviation (or standard error).

4.26.1 *random variance of increment collection (unit variance)*, S_r^2—the theoretical variance calculated for a uniformly mixed lot extrapolated to 1 lb (0.5 kg) increment size. For method of estimating this variance see Appendix X1.

4.26.2 *segregation variance of increment*, S_s^2—the variance caused by non-

from a pile, a rail car, a barge, or a shiphold.

5.4 *Spacing of Increments*—The spacing of increments pertains to the kind of intervals between increments. Two spacing methods are recognized: systematic and random. Systematic spacing is usually preferable.

5.4.1 *Systematic Spacing 1*, in which the movements of individual increment collection are spaced evenly in time or in position over the lot.

5.4.2 *Random Spacing 2*, in which the increments are spaced at random in time or in position over the lot.

6. Organization and Planning of Sampling Operations

6.1 *Precaution*—It is imperative that every gross sample be collected carefully and conscientiously and in strict accordance with the procedures prescribed in these methods; for if the sampling is done improperly, the sample will be in error and it may be impossible or impracticable to take another sample. However, if the analysis is in error, another analysis can easily be made of the original sample, except for moisture.

6.2 *Selection of Appropriate Sampling Procedure*—Variations in coal-handling facilities make it impossible to publish rigid rules covering every sampling situation in complete and exact details. Proper sampling involves an understanding and proper consideration of the minimum number and weight of increments, the size consist of the coal, the condition of preparation of the coal, the variability of the constituent sought, and the degree of precision required.

6.2.1 *Number and Weight of Increments*—The number and weight of increments required for a given degree of precision depends upon the variability of the coal. This variability increases with an increase in free impurity. A coal high in inherent impurity and with comparatively little free impurity may exhibit much less variability than a coal with a low inherent impurity and a relatively high proportion of free impurity. For most practical purposes, an increase in the ash content of a given coal usually indicates an increase in variability. It is imperative that not less than the minimum spec[illegible] numb[illegible] incre[illegible] of n[illegible] than the minimum specified weight be collected shall be of equal weight.

6.2.2 *Increment Collection Method to Be Used*—In order to obtain complete representation of all sizes, it is most desirable that the sample increments be withdrawn from the full cross section of the stream. The best possible increment is a full cross-section cut removed from a stopped belt; Classification I-A-1 in Table 1. The best possible increment from a flowing stream of coal is one obtained by moving a cutter device entirely across the stream at a uniform speed, the same for each increment, into one side of the stream and out of the other, without allowing the receptacle to overflow (Classification I-B-1 in Table 1). Classification methods given in Table 1 are listed in order of decreasing reliability. The highest possible classification method, wherever feasible, should be used. Details of sampling procedures should be agreed upon in advance by all parties concerned. Whenever circumstances dictate utilization of increment collection classifications "Condition C" or "Condition D" or "Type II", details of sampling procedure shall be agreed upon in advance by all parties concerned.

6.3 *Distribution of Increments*—It is essential that the increments be distributed throughout the lot to be sampled. This distribution is related to the entire volume of the lot, not merely its surface or any linear direction through it or over it. If circumstances prevent the sampler from applying this principle, the lot is sampled only in part, and the gross sample is representative only of this part. The spacing of the increments shall be varied if the possibility exists that increment collection may get "in phase" with the sequence of coal variability. Example: routine sampling of commercial coal from a continuous stream (conveyor belt), where increment collection is automatic and its sequence coincides with the "highs" or "lows" in the content of fines.

6.4 *Dimensions of Sampling Device*—The opening of the sampling device shall be at least 2½ to 3 times the top-size of the coal. For practical reasons, however, it is recommended that the opening of any sampling device be not less than 1¼ in. (31.8 mm), regardless of the top size of the coal. In sampling from a moving stream, the effective width is the width pro[illegible]ted p[illegible]dicul[illegible] the re[illegible] direction of the stream (Note 1). The sampling device must entirely pass the increment without loss or spillage.

NOTE 1—*Geometry of Cutting Samples from Moving Streams*—Consider the geometric plane that is common to the directions of the cutter movement and of the stream being sampled as shown in the vector diagram in Fig. 1. In this plane, determine α, the angle between these two directions. Draw the vectors V_c and V_s so that their lengths are proportional to the velocities of the cutter and of the stream, in the common plane. See Fig. 1 (*a*). Join the origins of these vectors to give V_r, the vector of stream movement relative to the cutter and to get angle β. Apply this angle to a scaled cross section of the sample cutter with W_a being the actual width in the direction of travel. See Fig. 1 (*b*). Measure W_e, the effective cutter width as the width in the relative direction of the stream. When angle β differs appreciably from 90 deg the height of the cutter blades must be sufficient to prevent contamination of sample by particles bounced off the leading face of the cutter.

6.5 *Movement of Sampling Device*—In sampling from moving streams of coal the sampling device shall be designed to minimize disturbance of the coal, thereby avoiding separation of various coal densities and sizes or both. To prevent segregation and rejection due to disturbance of the coal stream, practical evidence indicates that the velocity with which the cross-stream cutting instrument travels through the stream should not exceed 18 in./s (457 mm/s). Other type cutters operating in excess of 18 in./s are available. However, the user should be aware that the cutting device must be proven to be free of bias under the normal range of conditions expected.

6.6 *Preservation of Moisture*—The increments obtained during the sampling period shall be protected from changes in composition due to exposure to rain, snow, wind, sun, contact with absorbent materials, and extremes of temperature. The circulation of air through equipment must be reduced to a minimum to prevent both loss of fines and moisture. Samples in which moisture content is important shall be protected from excessive air flow and then shall be stored in moisture-tight containers. Metal cans with air-tight lids, or heavy vapor-impervious bags, properly sealed, are satisfactory for this purpose.

6.7 *Contamination*—The sampling arrange[illegible] shall be planned so that contamination of the increments with foreign material or unre[illegible]oal is [illegible]ded.

6.8 *Mechanical System Features*—With tem as a whole including the sample cutter, chutes, conveyors, crushers and other devices be self-cleaning and nonclogging and be designed in a manner that will minimize the need for maintenance.

6.9 *Personnel*—Because of the many variations in the conditions under which coal must be sampled, and in the nature of the material being sampled, it is essential that the [illegible]es be collected under the direct supervi[illegible] a person qualified by training and expe[illegible]or this responsibility. Where human la[illegible]n-ployed to collect the increments, it [illegible]al that samples be collected by a trained and experienced sampler or under the direct personal observation of such a person. This includes sampling for the purpose of determining sampling characteristics of a coal or characteristics of a particular sampling apparatus.

6.10 *Criteria of Satisfactory Performance*—A satisfactory sampling arrangement is one that takes an unbiased sample at the desired degree of precision of the constituent for which the sample is to be analyzed. One fundamental characteristic of such an arrangement is that the size consist of the sample will adequately represent the true size consist of the coal. Sampling systems shall be tested initially and at regular intervals to determine whether the sample adequately represents the coal. In addition, sampling systems should be given a rough performance check as a matter of routine. This is done by comparing the weight or volume of collected sample with that of the total flow of coal to assure a constant sampling ratio.

6.11 *Relative Location of Sampling and Weighing*—It is preferable that coal be weighed and sampled at the same time. If there is a lapse in time between these two events, consideration should be given by both purchaser and seller to changes in moisture during this interval and the consequent shift in relationship of moisture to the true quality of the coal at the instant when ownership of the coal transfers from one to the other.

7. Sampling of Coals Based on Size and Condition of Preparation

7.1 *General-Purpose Samplin[illegible]ocedure*:

7.1.1 The general-purpose sa[illegible]ing procedure is intended for a precision such that if gross samples are taken repeatedly from a lo[illegible]

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af ted by change errors as well as by

ir drying—a process of partial drying of b-g it near to equilibrium with the he in the room in which further re- a..d division of the sample is to take

na' sis sample—final subsample pre- ro the original gross sample but re- b 100 % through No. 60 (250-μm) sieve ided to not less than 50 g.

ia. systematic error)—an error that is nt negative or consistently positive. an of errors resulting from a series of tions which does not tend towards zero.

ha e error—error that has equal prob- of ing positive or negative. The mean hance errors resulting from a series of tions tends toward zero as the number va ons approaches infinity.

on. nment—a discrete amount of coal, a shipment, a carload, a unit train, or production. A consignment may include an ne lot of coal and may correspond cil d period of time such as sampling ir billing period.

ror—difference of an observation or a fc er ns from the best obtainable o he ..e value.

ee impurity—the impurities in a coal st as individual discrete particles that a uctural part of the coal and that se rated from it by coal preparation

os sample—a sample representing one al id composed of a number of incre- h ..ich neither reduction nor division f performed.

hc ment—a small portion of the lot b one operation of a sampling device ma..y combined with other increments lot to make a gross sample.

nh nt ash—the residue remaining ii erent impurities after ignition un- itions specified for the ash determina-

ah nt impurity—the inorganic mate- al hat is structurally part of the coal ot be separated from it by coal prep- ethods.

t- quantity of coal to be repre- a ross sample.

ecision—a term used to indicate the capability of a person, an instrument, or a method to obtain reproducible results; specifically, a measure of the chance error as expressed by the variance, the standard error, or a multiple of the standard error (see Recommended Practice E 177).

4.15 *representative sample*—a sample collected in such a manner that every particle in the lot to be sampled is equally represented in the gross sample.

4.16 *sample*—a quantity of material taken from a larger quantity for the purpose of estimating properties or composition of the larger quantity.

4.17 *sample division*—the process whereby a sample is reduced in weight without change in particle size.

4.18 *sample preparation*—the process that may include air drying, crushing, division, and mixing of a gross sample for the purpose of obtaining an unbiased analysis sample.

4.19 *significant loss*—any loss that introduces a bias in final results that is of appreciable economic importance to the concerned parties.

4.20 *size consist*—the particle size distribution of a coal.

4.21 *standard deviation*—the square root of the variance.

4.22 *subsample*—a sample taken from another sample.

4.23 *systematic error* (see 4.4 *bias*)

4.24 *top size*—the opening of the smallest screen in the series upon which is retained less than 5 % of the sample (see Method D 431).

4.25 *unbiased sample* (*representative sample*)—a sample free of bias.

4.26 *variance*—the mean square of deviations (or errors) of a set of observations; the sum of squared deviations (or errors) of individual observations with respect to their arithmetic mean divided by the number of observations less one (degrees of freedom); the square of the standard deviation (or standard error).

4.26.1 *random variance of increment collection* (*unit variance*), S_r^2—the theoretical variance calculated for a uniformly mixed lot and extrapolated to 1 lb (0.5 kg) increment size. For a method of estimating this variance see Appendix X1.

4.26.2 *segregation variance of increment collection*, S_s^2—the variance caused by nonrandom distribution of ash content or other constituent in the lot. For a method of estimating this variance see Appendix X1.

4.26.3 *total variance*, S_o^2—the over-all variance resulting from collecting single increments, and including division and analysis of the single increments. For a method of estimating this variance see Appendix X2.

5. Increment Collection Classification

5.1 The type of selection, the conditions under which individual increments are collected, and the method of spacing of increments from the coal consignment or lot are classified according to the following descriptions and Table 2. These designations are to be used for sampling specifications and for descriptions of sampling programs and sampling equipment.

5.2 *Types of Increments*—The types of selection of increments are based on whether or not there is human discretion in the selection of the pieces of coal or portions of the coal stream.

5.2.1 *Type I*, in which specific pieces or portions are not subject to selection on a discretionary basis. This includes that in which the increment is collected in precise accord with previously assigned rules on timing or location that are free of any bias. Type I selection increments generally yield more accurate results.

5.2.2 *Type II*, in which some measure of human discretion is exercised in the selection of specific pieces of coal or of specific portions of the stream, pile, or shipment.

5.3 *Conditions of Increment Collection*—The conditions under which individual increments are collected are the conditions of the main body of coal relative to the portion withdrawn. Four conditions are recognized:

5.3.1 *Condition A* (*Stopped-Belt Cut*), in which a loaded conveyor belt is stopped and a full cross-section cut with parallel sides is removed from the coal stream. The distance between the parallel faces shall not be less than three times the diameter of the largest piece.

5.3.2 *Condition B* (*Full-Stream Cut*), in which a full cross-section cut is removed from a moving stream of coal.

5.3.3 *Condition C* (*Part-Stream Cut*), in which a portion, not a full cross stream, is removed from a moving stream of coal.

5.3.4 *Condition D* (*Stationary Coal Sampling*), in which a portion of coal is collected

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made on the analysis sample from each gross sample, 95 out of 100 of these determinations will fall within ±1/10 of the average of all the determinations. Under some conditions, as detailed in 6.2.1 and 6.2.2, Condition C and D and Type II, this precision may not be obtained.

7.1.2 *Number and Weight of Increments*—Obtain the number and weight of increments as specified in Table 2 except as provided in 7.1.5.2. Determine the minimum number of increments from the condition of preparation, and determine the minimum weight of each increment from the top size of the coal. Classify the coals to be sampled according to the general purpose procedure into three groups by top size. Further classify each of these groups into two subgroups in accordance with the condition of preparation. These classifications are shown in Table 2.

7.1.3 Variations in construction of the sampling device and flow, structure, or size consist of the coal may make it impracticable to collect increments as small as the minimum weight specified in Table 2. In such cases, collect an increment of greater weight. However, do not reduce the minimum number of increments, regardless of large excesses of individual increment weights. Table 2 lists the absolute minimum number of increments for general purpose sampling which may not be reduced except as specified in 7.1.5.2. Other considerations may make it advisable or necessary to increase this number of increments.

7.1.4 *Number of Gross Samples*—Under the general-purpose sampling procedure, for quantities up to approximately 1000 tons (908 metric tons) (908 Mg) it is recommended that one gross sample represent the lot. Take this gross sample in accordance with the requirements prescribed in Table 2.

7.1.5 For quantities over 1000 tons (908 Mg), use any of the following alternatives:

7.1.5.1 Take separate gross samples for each 1000-ton lot of coal or fraction thereof.

7.1.5.2 Use one gross sample to represent the total tonnage provided the number of increments, as stated in Table 2, are increased as follows:

$$N_2 = N_1 \sqrt{\frac{\text{total lot (tons or Mg)}}{\text{1000 tons or 908 Mg}}} \quad (1)$$

where:

N_1 = number of increments specified in Table 2, and

N_2 = number of increments required.

For example, a 4000-ton (3632-Mg) lot will require twice the number of increments specified in Table 2. Using this technique, it is theoretically possible to collect one gross sample to represent a lot of infinite tonnage. Practical experience, however, indicates the maximum size of a lot of coal to be represented by one gross sample should not exceed 10 000 tons (9080 Mg).

7.2 *Special-Purpose Sampling Procedure*:

7.2.1 This special-purpose sampling procedure shall apply to the sampling of coal when increased precision is required, and the only knowledge of the coal is its top size and conditions of preparation.

7.2.2 *Number and Weight of Increments*—Take the same number and weight of increments per gross sample as specified in Table 2, or as specified in 7.1.5.3.

7.2.3 *Number of Gross Samples*—To obtain increased precision for the laboratory result for a given consignment, increase the number of gross samples collected from that consignment and analyze each gross sample separately, reporting the average of results. To reduce errors to one half, that is, to "double" the precision, take four times as many gross samples. Similarly, to reduce errors to one third, to "triple" the precision, take nine times as many gross samples.

8. Sampling of Coals Based on Known Sampling Characteristics

8.1 *Principles of Sampling by Sampling Characteristics*:

8.1.1 The relationship between sampling characteristics (expressed as variances) and the number of increments which will give a desired precision (expressed as the specified variance of one gross sample) is shown as follows:

$$N_1 = (s_o^2 + s_r^2/W)/(s_G^2 - S_{da}^2/P) \quad (2)$$

where:

N_1 = the number of increments in one gross sample,

W = the weight in pounds of each increment; this is selected for convenience or by the limitations imposed by the particular mec[illegible]al sar[illegible] app[illegible],

s_r^2 = the random variance of a 1-lb (0.5-kg) increment; this value is obtained from the special sampling program given in Appendix X1 (Note X1),

s_s^2 = the segregation variance; this value is also obtained from the special sampling program given in Appendix X1 (Note X1),

s_{da}^2 = the variance of division and analysis. Procedures for calculating this quantity are given in Appendix X2 of Method D 2013.

P = the number of analysis samples (prepared independently from the same gross sample), and

s_G^2 = the specified variance of one gross sample. The procedure for determining this variance is given in 8.1.2 and 8.1.3.

NOTE 2—The random variance and the segregation variance, s_r^2 and s_s^2, are each inflated by unknown amounts of variance due to division and analysis. Since this results in an increased numerator in Eq. 2, and consequently, a larger calculated number of increments, N_1, it can be considered a "safety factor" for the sampling program. However, if too many large increments are taken for the evaluation of s_r^2 and s_s^2, the "safety factor" may become unreasonably large.

8.1.2 The relationship between the specified variance of one gross sample, s_G^2, and the precision for the result of several gross samples in one test period, expressed as the test period variance, s_T^2, is given as follows:

$$s_T^2 = s_G^2/N_G \quad (3)$$

where:

s_T^2 = the test period variance,

s_G^2 = the specified variance of one gross sample, and

N_G = the number of gross samples in the test period.

8.1.3 Fig. 2 shows the relationship between variance and sampling precision (plus or minus percent of a given constituent, 95 cases out of 100). The variance (Fig. 2) can be either the test period variance, s_T^2, or the specified variance of one gross sample, s_G^2. This choice will depend upon the sampling situation to be evaluated. The sampling precision (Fig. 2) can be based on any coal constituent, provided it is ex[illegible]ssed as a percentage of that constituent. T[illegible]llowing example is an illustration of the calculations necessary to determine the number c[illegible]men[illegible] one [illegible] samp[illegible]

8.1.3.1 *Accuracy Limits*—Assume a coal of 6.5 % average ash content. If the desired accuracy is ±1/10 of the ash content, the sampling accuracy can be expressed as ±0.6[illegible] % ash.

8.1.3.2 *Test Period Variance*—The accuracy limits given in 8.1.3.1 correspond to a test period variance, s_T^2, of 0.112, from Fig. 2 (Line 1).

8.1.3.3 *Specified Variance of One Gross Sample*—The specified variance of one gros[illegible] is equal to the test period of varia[illegible] multiplied by the number of gross sa[illegible] the test period, N_G (Eq 3). Assumin[illegible] gross samples in the period, the spec[illegible] ance for one gross sample is then equal to 0.112 × 7 or 0.784.

8.1.3.4 *Number of Increments*—Assume the following information was obtained from the special sampling procedures outlined in Appendix X1 of this procedure and Appendix X2 of Method D 2013: $s_r^2 = 12.5$, $s_s^2 = 10.2$, and $s_{da}^2 = 0.06$ (one analysis sample per gross sample). The specified variance of one gross sample, s_G^2, as found previously, is 0.784. Further, the weight per increment for this sampling device, is found to be 50 lb (23 kg). Then, substituting into Eq 2:

$$N_1 = (10.2 + 12.5/50)/(0.784 - 0.06/1) = 14.4 \text{ or } 15 \text{ increments}$$

For this coal, 15 increments of 50 lb (23 kg) each would be required for each gross sample, and seven gross samples would constitute the sampling period. The weighted average for the test period will be within ±0.65 % ash, 95 cases out of 100.

8.1.4 The following variance relationship can be derived from Eq 2. It combines the random variance, s_r^2, and the segregation variance, s_s^2. This derivation is applicable when the incremental weight is fixed by the characteristics of the sampling equipment:

$$s_T^2 = [(s_o^2 - s_{da}^2)/N_G N_I] + s_{da}^2/PN_G \quad (4)$$

where:

s_o^2 = the over-all variance of single increments (including division and analysis), as determined by Appendix X2.

Other terms are as defined in 8.1.1 and 8.1.2. The following example demons[illegible] the use of the overall variance for increme[illegible] s_o^2, in determ[illegible] the [illegible]ber of increments for one gross sample:

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8.1.4.1 *Test Period Variance*—Assume a required accuracy of ±0.5 % ash. This corresponds to a test period variance, s_T^2, of 0.066 from Fig. 2 (Line 2).

8.1.4.2 *Number of Increments*—Assume the following information was obtained from the special sampling procedures outlined in Appendix X2 of Method D 2013, and Appendix X2 of this procedure: $s_o^2 = 3.5$ and $s_{dn}^2 = 0.08$. If it is desired to take ten gross samples during the test period (N_G), with only one analysis (p) for each gross sample, the number of increments for each gross sample (N_I) can be determined by substitution into Eq 4:

$$0.066 = [(3.5 - 0.08)/10N_I] + [0.08/(10 \times 1)]$$

where

N_I = 5.9 or 6 increments.

For this coal, six increments would be required for each of the ten gross samples. The weighted average for the test period will be within ±0.5 % ash, 95 cases out of 100.

8.1.5 For sampling mixed coals, the values of random variance, segregation variance, overall variance for increments, and the variance of division and analysis for use in Eq 2, 8.1.1 and Eq 4, 8.1.4, are those obtained from special sampling programs using the mixture which is the most difficult to sample.

8.2 *General-Purpose Sampling Procedure*:

8.2.1 *Number and Weight of Increments*—Use this general-purpose sampling procedure for the commercial sampling of coal. Use this procedure to obtain a precision of ±1/10 of the average of all ash determinations in 95 out of 100 cases by taking gross samples repeatedly from one lot, and making one ash determination on the analysis sample from each gross sample. For this degree of precision, determine the number and weight of increments for each gross sample as illustrated in 8.1.3 and 8.1.4.

8.2.2 *Number of Gross Samples*—Select the number of gross samples for coals of known sampling characteristics to suit the parties concerned with results from the sampling, since the number of gross samples is directly related to the establishment of the required number of increments as outlined in 8.1.3 and 8.1.4. The following factors should [illegible]emembered in setting the number of gross samples for the test period:

8.2.2.1 Too few gross samples will result in additional preparation work because of the large number of increments per gross sample which will be required.

8.2.2.2 The preparation of the samples for analysis purposes will be simplified by using samples of minimum weight.

8.2.2.3 Use special precautions if the gross samples are to be used for moisture determinations. A gross sample collected over a long period of time will change in moisture content depending upon the surrounding atmospheric conditions. See 6.6.

8.3 *Special-Purpose Sampling Procedure*:

8.3.1 Apply this special-purpose sampling procedure to the sampling of coal when other precision limits are required or when other constituents are used to specify precision.

8.3.2 *Number and Weight of Increments and Number of Gross Samples*—For a precision of ±1/20 of the average of all the ash determinations in 95 out of 100 cases when gross samples are repeatedly taken from the same lot, use Fig. 2 to determine the test period variance, s_T^2. In this case, use the new sampling precision limitations of ±1/20 of the average ash in Fig. 2. Then determine the number of increments and number of gross samples as outlined in 8.1.3, 8.1.4, and 8.2.2.

8.3.3 For a precision of ±1/30 of the average ash, use Fig. 2 again to determine the test period variance, s_T^2. In this case, use the new sampling precision limitations in Fig. 2.

8.3.4 Other precision limits may be used or other constituents may be used to specify precision when agreed upon by the parties concerned. The principles outlined in this section will apply to all special precision limits.

8.3.5 Greater accuracy cannot be obtained by merely increasing the weight and number of increments if significant bias exists.

9. Division of the Gross Sample Before Crushing

9.1 In the case of very large and unwieldy gross samples, it is permissible to divide the gross sample to reduce its weight, provided the following conditions are fulfilled:

9.1.1 If the entire gross sample is mixed in a suitable blender (double cone or twin shell tumbler) it is permissible to divide the sample u[illegible] the sc[illegible] of [illegible] 2. Te[illegible] divi[illegible] sample for bias.

9.1.2 If each very large increment is reduced a quantity by secondary sampling, take at least six secondary increments from each primary increment. The method of collection of secondary increments must be proved to be free from bias. In no case shall the weight of a secondary increment be less than shown in the schedule of Table 2.

10. Sampling of Coal for Total Moisture Determinations

10.1 *Types of Moisture Samples*—Moisture determinations as specified in the method to be employed, are to be made on the following kinds of samples.

10.1.1 *Entire Gross Sample*—For referee tests, air dry the entire gross sample and measure the weight loss from the entire gross sample during this drying. This procedure can be carried out on the entire gross sample as a single batch or on groups of primary increments or as separate operations on the individual primary increments; obtain, by one of these means, the total weight loss from the entire gross sample. After this air drying, the sample can be crushed or divided or both as required by the referee test for moisture.

10.1.2 *Special Moisture Subsample*—For moisture testing, a special subsample can be taken from a gross sample before any operations of air drying or crushing. Take this subsample from the gross sample in accord with the requirements of Section 9.

10.1.3 *Other Subsamples for Moisture Testing*—For moisture testing, a subsample can be used that is collected after the initial crushing and dividing of a gross sample. The procedures for the crushing and dividing, and for this subsequent subsampling for moisture, are given in Method D 2013.

10.2 *Special Precautions*—Collect samples and subsamples for moisture in such a manner that there is no unmeasured loss of moisture of significant amount. Make adequate weighings before and after drying or other operations to measure all significant weight losses.

10.3 *Weight of Increments*—The minimum weight of each increment must be that which is sufficient as to be free of bias. This depends on the top size of the coal in the stream being sampled, the dimensions of the collecti[illegible] vice, and other factors of the withdrawal [illegible] increment. Since much of the moisture to [illegible] be distributed uniformly across the [illegible] moisture bias is present when the size [illegible] of the sample is not the same as the size consist of the lot sampled. In addition, when there is no knowledge of the sampling characteristics for moisture, each increment shall weigh not less than the values in Table 2.

10.4 *Number of Increments*—The number of increments required for a given degree of precision depends on the weight of the increments, the distribution of the moisture, and the total amount of moisture. The distribution of moisture, however, is not easily evaluated independent of total moisture; consequently, the combined effects can be measured by determining the sampling characteristics for moisture.

10.4.1 *Moisture Sampling Based on Known Sampling Characteristics*—When the sampling characteristics for moisture are known, calculate the number of increments required for a desired degree of precision. The procedures are those given in Section 8 of this procedure.

10.4.2 *Moisture Sampling Based Only on Size*—When there is no knowledge of the sampling characteristics for moisture, collect at least the number of increments from the lot of coal as those given in Table 2. When a special moisture subsample is taken from the gross sample before any drying or crushing operations, collect the number of increments for the subsample as specified in Section 9.

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TABLE 1 Increment Types, Conditions, and Spacing

Condition of Increment Collection from the Main Body of Coal	Types of Increment			
	Type I No Human Discretion Is Employed		Type II Human Discretion Is Employed	
	Spacing of Increments		Spacing of Increments	
	1. Systematic	2. Random	1. Systematic	2. Random
Condition A, stopped belt cut	I-A-1	I-A-2	II-A-1	II-A-2
Condition B, full stream cut	I-B-1	I-B-2	II-B-1	II-B-2
Condition C, part stream cut	I-C-1	I-C-2	II-C-1	II-C-2
Condition D, stationary sampling	I-D-1	I-D-2	II-D-1	II-D-2

TABLE 2 Number and Weight of Increments for General Purpose Sampling Procedure[A]

Top Size	⅝ in. (16 mm)	2 in. (50 mm)	6 in. (150 mm)[B]
Mechanically Cleaned Coal[C]			
Minimum number of increments	15	15	15
Minimum weight of increments, lb	2	6	15
Minimum weight of increments, kg	1	3	7
Raw (Uncleaned Coal)[C]			
Minimum number of increments	35	35	35
Minimum weight of increments, lb	2	6	15
Minimum weight of increments, kg	1	3	7

[A] Under conditions C and D see 6.2.1 and 6.2.2.

[B] For coals above 6 in. (150 mm) top size, the sampling procedure should be mutually agreed upon in advance by all parties concerned.

[C] If there is any doubt as to the condition of preparation of the coal (for example, mechanically cleaned coal or raw coal) the number of increments for raw coal shall apply. Similarly, although a coal has been mechanically cleaned, it may still show great variation because of being a blend of two different portions of one seam or a blend of two different seams. In such cases the number of increments should be as specified for raw (uncleaned) coal.

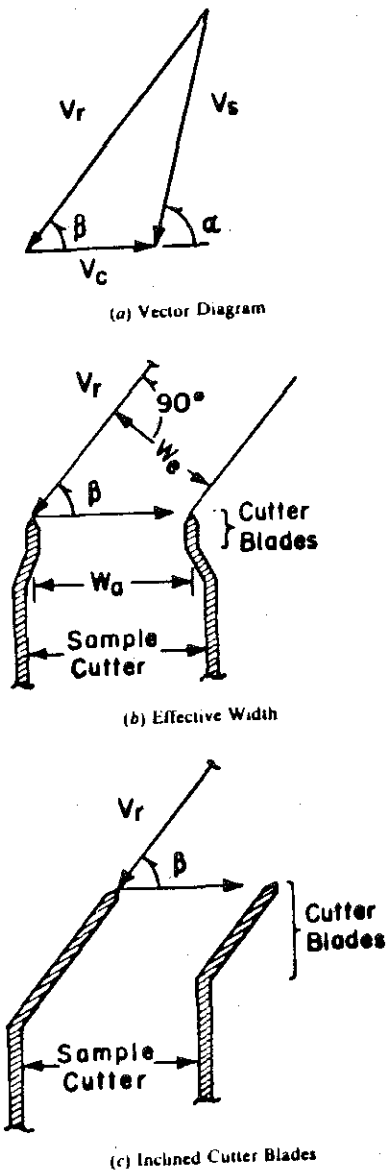

FIG. 1 The Geometry of Cutting Samples from a Moving Stream

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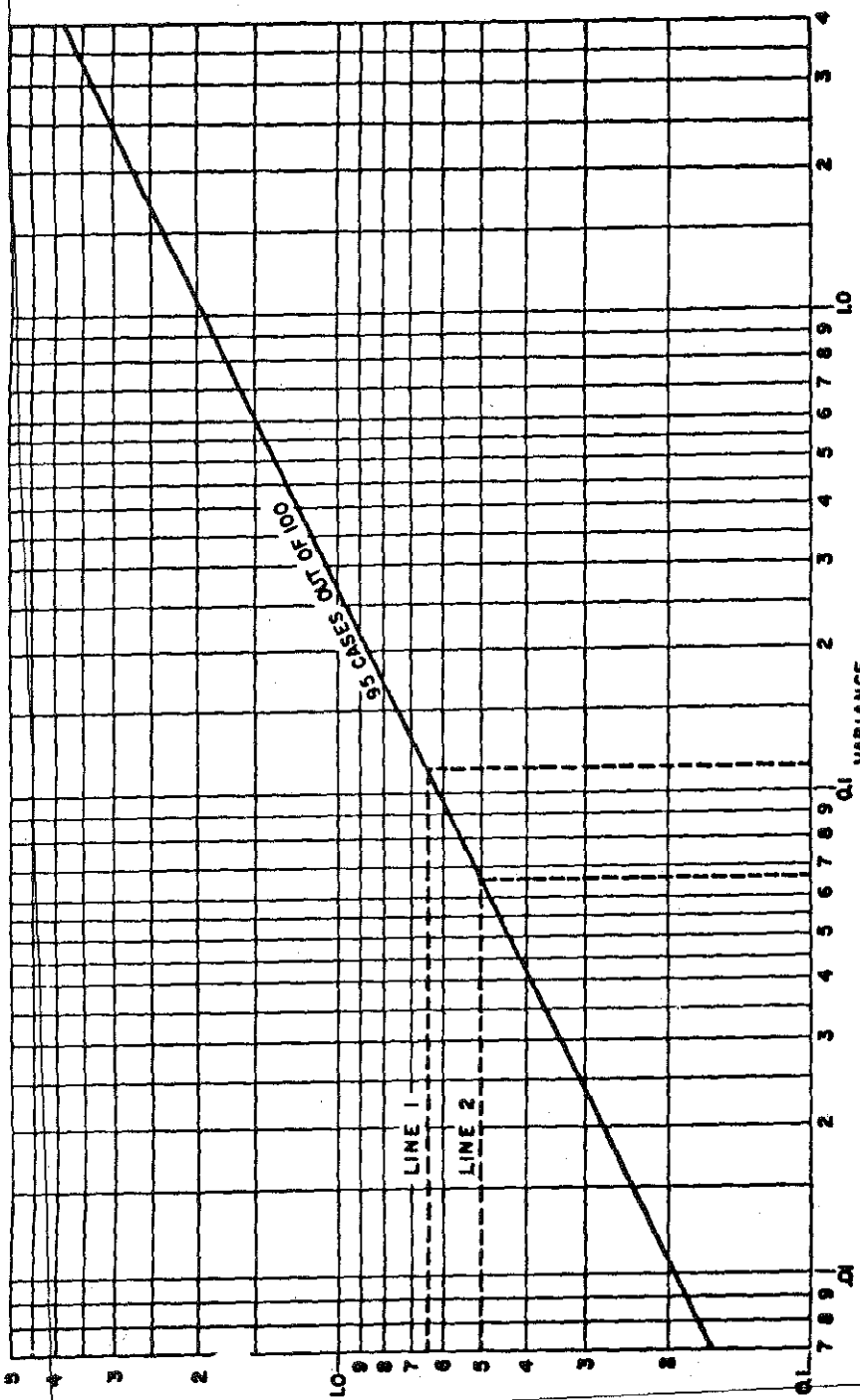

FIG. 2 Conversion of Sampling Accuracy to Variance

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APPENDIXES

(Nonmandatory Information)

X1. METHOD FOR DETERMINING THE VARIANCE COMPONENTS OF A CO

X1.1 Scope

X1.1.1 This method covers a procedure for determining the following variance components of a coal:

X1.1.1.1 The random variance of a 1-lb (0.5-kg) increment, s_r^2, and

X1.1.1.2 The segregation variance, s_s^2, the variance caused by nonrandom distribution of the ash content in the lot or consignment.

X1.1.2 In this method, each different coal will require a complete experiment, which involves the collection of two sets of 30 samples from a stopped conveyor belt. The first set of samples includes 30 very small samples to furnish data for the random variance; the second set includes 30 large samples to furnish data for the segregation variance. Since one of the important components of variance is that due to segregation, it is essential that the 30 large samples be so distributed with respect to time that coverage of all subtypes of coal are represented.

X1.2 Apparatus

X1.2.1 The following equipment, in addition to that equipment normally provided for routine sampling, will be required:

X1.2.1.1 *Two-Section Belt Divider*—One of the sections should be approximately the width corresponding to three times the top size of the coal, and should trap a sample of between 4 and 20 lb (2 and 9 kg). The other section should be approximately the width corresponding to 20 times the top size of the coal and should trap a sample of between 80 and 150 lb (36 and 68 kg). The bottom edges of the divider should be shaped to conform to the surface of the conveyor belt.

X1.2.1.2 *Riffle Splitter*, with slots at least 2½ to 3 times as wide as the maximum size of the particles, or a manual divider and canvas for subdividing the small samples by hand.

X1.3 Procedure

X1.3.1 The following sampling procedure should be used for each of the two required sets of samples:

X1.3.1.1 Stop the loaded belt and insert the belt divider with the division plates perpendicular to the direction of belt movement. Scrape off the coal from each section, and put each section into a separate completely labeled container. The container holding the [illegible] from the small section of the belt divider sh[illegible]e labeled "A." The container holding the coal [illegible]om the large section of the belt divider should be labeled "B."

[illegible] 2 Co[illegible] subsa[illegible] [illegible]om th[illegible] "A" sectio[illegible] [illegible]ffling or by manual subdivision after spreading the sample evenly on a smooth flat surface. Tag the subsample with a label "A", and weigh to the [illegible] gram. The weight of the subsample should [illegible] tween 100 to 200 g.

X1.3.1.3 Dry the "A" subsample, grind [illegible] No. 60 sieve size and determine the ash [illegible] the nearest 0.1 %, dry basis.

X1.3.1.4 Weigh the entire "B" section, dry, and work down to an analysis sample. Determine the ash content to the nearest 0.1 %, dry basis.

X1.4 Calculation

X1.4.1 Calculate the variance of the "A" and "B" series (Note X1) as follows:

$$\text{Variance} = (\Sigma x^2 - (\Sigma x)^2/n)/(n - 1) \quad (5)$$

where:

Σx^2 = the sum of the squares of ash results,
$(\Sigma x)^2$ = the square of the sum of ash results, and
n = the number of individual ash results in the series.

X1.4.2 The random variance, s_r^2, is found from:

$$s_r^2 = [W_1 W_2 (s_A^2 - s_B^2)]/(W_2 - W_1) \quad (6)$$

where:

W_1 = average weight of small samples, lb or equivalent kg,
W_2 = average weight of large samples, lb or equivalent kg,
s_A^2 = variance of small, "A" samples, and
s_B^2 = variance of large "B" samples.

X1.4.3 The segregation variance, s_s^2, is found from:

$$s_s^2 = s_B^2 - s_r^2/W_2 \quad (7)$$

NOTE X1—An actual example illustrating the treatment of data from this sampling experiment is given in Tables X1.1 to X1.3 and in Fig. X1.1.

X1.4.3.1 Using log-log paper, plot the point corresponding to an increment weight $w = 1$ lb (0.5 kg) and variance $s_r^2 = 7.6$; draw a straight line through this point, downward at 45 deg. This line gives the random component of variance for an increment of any weight. Plot the point corresponding to an increment weight $w_2 = 106$ lb (48 kg) and variance $s_s^2 = 1.2$; draw a straight horizontal line through this point. This line gives the segregation component of variance for an increment of any weight.

X1.4.3.2 On Fig. X1.1, find the algebraic sum of the random component and the segregation component of variance for a number of incr[illegible]nt weights; draw a curve through these points. [illegible]urve gives the total variance of sampling for inc[illegible]ents of any weight, including those used in the "A" and "B" series.

TABLE X1.1 Schedule I: Sample Weights

Set Number	"A" Series, g	"B" Series, lb
1	89	117.4
2	126	117.5
3	152	123.4
4	109	90.7
5	149	101.7
6	87	89.6
7	110	107.7
8	142	110.8
9	123	123.0
10	111	106.2
11	140	116.4
12	121	96.7
13	112	109.0
14	122	106.9
15	158	99.8
16	160	87.6
17	55	88.6
18	76	92.3
19	105	93.0
20	132	99.8
21	108	106.6
22	86	124.2
23	142	127.8
24	123	111.3
25	133	111.6
26	261	107.2
27	129	106.0
28	150	102.8
39	108	97.7
30	99	107.4
Sum	3732	3180.7
Average	124.4 g, or 0.27 lb = w_1	106.0 lb or 48.1 kg = w_2

TABLE X1.2 Schedule II: Ash Results "A" Series

Set	Ash, percent	Ash, percent-squared
1	14.2	201.64
2	13.4	179.56
3	13.7	187.69
4	15.8	249.64
5	13.7	187.69
6	14.1	198.81
7	13.6	184.96
8	18.7	349.69
9	16.3	265.69
10	12.4	153.76
11	5.8	33.64
12	12.2	148.84
13	10.9	118.81
14	8.9	79.21
15	34.5	1190.25
16	8.7	75.69
17	7.5	56.25
18	15.7	246.49
19	21.8	475.24
20	11.8	139.24
21	12.2	148.84
22	11.8	139.24
23	7.1	50.41
24	12.8	163.84
25	14.0	196.00
26	6.3	39.69
27	12.3	151.29
28	7.2	51.84
29	13.1	171.61
30	11.3	127.69
Sum	391.8	5963.24

$$s_A^2 = [5963.24 - (391.8)^2/30]/29 = 29.2$$

TABLE X1.3 Schedule III: Ash Results "B" Series

Set	Ash, percent	Ash, percent-squared
1	13.6	184.96
2	13.2	174.24
3	14.3	204.49
4	15.3	234.09
5	15.0	225.00
6	14.3	204.49
7	13.6	184.96
8	14.7	216.09
9	14.2	201.64
10	12.5	156.25
11	13.0	169.00
12	14.3	204.49
13	13.7	187.69
14	12.8	163.84
15	13.2	174.24
16	14.0	196.00
17	10.5	110.25
18	13.5	182.25
19	15.4	237.16
20	15.0	225.00
21	14.4	207.36
22	12.8	163.84
23	13.0	169.00
24	13.0	169.00
25	12.3	151.29
26	13.1	171.61
27	14.2	201.64
28	11.6	134.56
29	13.1	171.61
30	11.4	129.96
Sum	405.0	5506.00

$$s_B^2 = \frac{[5506.00 - (405)^2/30]}{29} = 1.3$$

then:

$$S_r^2 = \frac{[0.27 \times 106\,(29.2 - 1.3)]}{106 - 0.27}$$

$$= 7.6$$

and

$$s_s^2 = 1.3 - (7.6/106)$$

$$= 1.2$$

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Standard Practice for SOIL INVESTIGATION AND SAMPLING BY AUGER BORINGS[1]

This standard is issued under the fixed designation D 1452; the number immediately following the designation indicates the year of original adoption or, in the case of revision, the year of last revision. A number in parentheses indicates the year of last reapproval. A superscript epsilon (ε) indicates an editorial change since the last revision or reapproval.

1. Scope

1.1 This practice covers equipment and procedures for the use of earth augers in shallow geotechnical exploration. This practice does not apply to sectional continuous flight augers.

2. Significance and Use

2.1 Auger borings often provide the simplest method of soil investigation and sampling. They may be used for any purpose where disturbed samples can be used and are valuable in connection with ground water level determination and indication of changes in strata and advancement of hole for spoon and tube sampling. Equipment required is simple and readily available. Depths of auger investigations are, however, limited by ground water conditions, soil characteristics, and the equipment used.

3. Apparatus

3.1 *Hand-Operated Augers:*

3.1.1 *Helical Augers*—Small lightweight augers generally available in sizes from 1 through 3 in. (25.4 through 76.2 mm).

3.1.1.1 *Spiral-Type Auger*, consisting of a flat thin metal strip, machine twisted to a spiral configuration of uniform pitch; having at one end, a sharpened or hardened point, with a means of attaching a shaft or extension at the opposite end.

3.1.1.2 *Ship-Type Auger*—Similar to a carpenter's wood bit. It is generally forged from steel and machined to the desired size and configuration. It is normally provided with sharpened and hardened nibs at the point end and with an integral shaft extending through its length for attachment of a handle or extension at the opposite end.

3.1.2 *Open Tubular Augers*, ranging in size from 1.5 through 8 in. (38.1 through 203.2 mm) and having the common characteristic of appearing essentially tubular when viewed from the digging end.

3.1.2.1 *Orchard-Barrel Type*, consisting essentially of a tube having cutting lips or nibs hardened and sharpened to penetrate the formation on one end and an adaptor fitting for an extension or handle on the opposite end.

3.1.2.2 *Open-Spiral Type*, consisting of a flat thin metal strip that has been helically wound around a circular mandrel to form a spiral in which the flat faces of the strip are parallel to the axis of the augered hole. The lower helix edges are hard-faced to improve wear characteristics. The opposite end is fitted with an adaptor for extension.

3.1.2.3 *Closed-Spiral Type*—Nearly identical to the open-spiral type except, the pitch of the helically wound spiral is much less than that of the open-spiral type.

3.1.3 *Post-Hole Augers*, generally 2 through 8 in. (50.8 through 203.2 mm), and having in common a means of blocking the escape of soil from the auger.

3.1.3.1 *Clam-Shell Type*, consisting of two

[1] This practice is under the jurisdiction of ASTM Committee D-18 on Soil and Rock and is the direct responsibility of Subcommittee D 18.02 on Sampling and Related Field Testing for Soil Investigations.

Current edition approved June 12, 1980. Published August 1980. Originally published as D 1452 – 57 T. Last previous edition D 1452 – 65 (1972).

hinged to allow opening and closing for easy digging and retrieving. It is not deeper than about 3.5 ft (1.07 m).

3.1.3.2 *Iwan Type*, consisting of two tubular segments, connected at the top to a common member to form a nearly complete tube, with diametrically opposed openings. It is closed at the bottom by two radial blades to serve as cutters which also block the flow of contained soil. Attachment of handle extension is at the top connector.

3.2 *Machine-Operated Augers:*

3.2.1 *Helical Augers*, generally 8 through 48 in. (203.2 through 1219 mm), consisting essentially of a center shaft fitted with a shank or socket for application of power, and having one or more complete 360° (6.28-rad) spirals for conveyance and storage of cut soil. Cutter bits and pilot bits are available in moderate and hard formation types and normally replaceable in the field. They are normally operated by heavy-duty, high-torque machines, designed for heavy construction work.

3.2.2 *Stinger Augers*, generally 6 through 30 in. (152.4 through 762 mm), are similar to the helical auger in 3.2.1, but lighter and generally smaller. They are commonly operated by light-duty machines for post and power pole holes.

3.2.3 *Disk Augers*, generally 10 through 30 in. (254 through 762 mm), consisting essentially of a flat, steel disk with diametrically opposed segments removed and having a shank or socket located centrally for application of power. Replaceable cutter bits, located downward from the leading edges of the remaining segments, dig and load soil that is held on the disk by valves or shutters hinged at the disk in order to close the removed segments. The disk auger is specifically designed to be operated by machines having limited vertical clearance between spindle and ground surface.

3.2.4 *Bucket Auger*, generally 12 through 48 in. (304.8 through 1219 mm), consisting essentially of a disk auger, without shank or socket, and hinge-mounted to the bottom of a steel cylinder or bucket of approximately the same diameter as the disk auger. A socket or shank for power application is located in the top center of the bucket diametral cross piece provided for the purpose.

3.3 *Casing* (when needed), consisting of pipe of slightly larger diameter than the auger used.

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halves, hinged to allow opening and closing for alternately digging and retrieving. It is not usable deeper than about 3.5 ft (1.07 m).

3.1.3.2 *Iwan Type*, consisting of two tubular steel segments, connected at the top to a common member to form a nearly complete tube, but with diametrically opposed openings. It is connected at the bottom by two radial blades pitched to serve as cutters which also block the escape of contained soil. Attachment of handle or extension is at the top connector.

3.2 *Machine-Operated Augers*:

3.2.1 *Helical Augers*, generally 8 through 48 in. (203.2 through 1219 mm), consisting essentially of a center shaft fitted with a shank or socket for application of power, and having one to three complete 360° (6.28-rad) spirals for conveyance and storage of cut soil. Cutter bits and pilot bits are available in moderate and hard formation types and normally replaceable in the field. They are normally operated by heavy-duty, high-torque machines, designed for heavy construction work.

3.2.2 *Stinger Augers*, generally 6 through 30 in. (152.4 through 762 mm), are similar to the helical auger in 3.2.1, but lighter and generally smaller. They are commonly operated by light-duty machines for post and power pole holes.

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3.2.4 *Bucket Auger*, generally 12 through 48 in. (304.8 through 1219 mm), consisting essentially of a disk auger, without shank or socket, but hinge-mounted to the bottom of a steel tube or bucket of approximately the same diameter as the disk auger. A socket or shank for power application is located in the top center of the bucket diametral cross piece provided for the purpose.

3.3 *Casing* (when needed), consisting of pipe of slightly larger diameter than the auger used.

3.4 *Accessory Equipment*—Labels, field log sheets, sample jars, sealing wax, sample bags, and other necessary tools and supplies.

4. Procedure

4.1 Make the auger boring by rotating and advancing the desired distance into the soil. Withdraw the auger from the hole and remove the soil for examination and test. Return the empty auger to the hole and repeat the procedure. Continue the sequence until the required depth is reached.

4.2 Casing is required in unstable soil in which the bore hole fails to stay open and especially when the boring is extended below the ground-water level. The inside diameter of the casing must be slightly larger than the diameter of the auger used. The casing shall be driven to a depth not greater than the top of the next sample and shall be cleaned out by means of the auger. The auger can then be inserted into the bore hole and turned below the bottom of the casing to obtain a sample.

4.3 The soil auger can be used both for boring the hole and for bringing up disturbed samples of the soil encountered. The structure of a cohesive soil is completely destroyed and the moisture may be changed by the auger. Seal all samples in a jar or other airtight container and label appropriately. If more than one type of soil is picked up in the sample, prepare a separate container for each type of soil.

4.4 *Field Observations*—Record complete ground water information in the field logs. Where casing is used, measure ground water levels, both before and after the casing is pulled. In sands, determine the water level at least 30 min after the boring is completed; in silts, at least 24 h. In clays, no accurate water level determination is possible unless pervious seams are present. As a precaution, however, water levels in clays shall be taken after at least 24 h.

5. Report

5.1 The data obtained in boring shall be recorded in the field logs and shall include the following:

5.1.1 Date of start and completion of boring,

5.1.2 Identifying number of boring,

5.1.3 Reference datum including direction

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and distance of boring relative to reference line of project or other suitable reference points,

5.1.4 Type and size of auger used in boring,

5.1.5 Depth of changes in strata,

5.1.6 Description of soil in each major stratum,

5.1.7 Ground water elevation and location of seepage zones, when found, and

5.1.8 Condition of augered hole upon removal of auger, that is, whether the hole remains open or the sides cave, when such can be observed.

The American Society for Testing and Materials takes no position respecting the validity of any patent rights asserted in connection with any item mentioned in this standard. Users of this standard are expressly advised that determination of the validity of any such patent rights, and the risk of infringement of such rights, are entirely their own responsibility.

This standard is subject to revision at any time by the responsible technical committee and must be reviewed every five years and if not revised, either reapproved or withdrawn. Your comments are invited either for revision of this standard or for additional standards and should be addressed to ASTM Headquarters. Your comments will receive careful consideration at a meeting of the responsible technical committee, which you may attend. If you feel that your comments have not received a fair hearing you should make your views known to the ASTM Committee on Standards, 1916 Race St., Philadelphia, Pa. 19103.

Designation: D 1556 – 82[ε1]

Standard Test Meth
DENSITY OF SOIL
METHOD[1]

standard is issued under the fixed design of original adoption or, in the case of revi approval. A superscript epsilon (ε) indicates

method has been approved for use by agenc Standards.

NOTE—Section 7.5.3 was changed editorially i

Scope

1.1 This method covers the determ in-place density of soils.

1.2 Any soil or other material t cavated with hand tools can be t ed the void or pore openings in th all enough to prevent the sand u from entering the natural voids. r material being tested should l nt cohesion or particle attraction t ble sides on a small hole or exc ould also be firm enough to witl nor pressures exerted in digging th acing the apparatus over it without sloughing.

1.3 When the moisture content an y are to be determined, this methc e used in certain soils or materials a paragraphs 1.3 and 3.5 of Methoc

2. Applicable Documents

2.1 *ASTM Standards:*

C136 Method for Sieve Analysis c Coarse Aggregates[2]

D653 Terms and Symbols Relating Rock Mechanics[3]

D698 Test Methods for Moistu Relations of Soils and Soil-Aggr tures Using 5.5-lb (2.49-kg) Ra 12-in. (305-mm) Drop[3]

D1557 Test Methods for Moistu Relations of Soils and Soil-Aggr tures Using 10-lb (4.54-kg) Ra 18-in. (457-mm) Drop[3]

D2049 Test Method for Relative I Cohesionless Soils[4]

OEPA Listed Citation 3, 40 CFR 265.52

As stated in the August 22, 1988 letter, the Contingency plan was sent to all the local and state authorities, letters and maps were included. At this time Master Metals has not received a reply from any of the parties that the plan was sent to. This is the second time the contingency plan was sent to some of the agencies and in some cases the third and fourth time. The facility can not force any agency to reply to the request of acknowledgement.

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OEPA Listed Citation 4, 40 CFR 265.73

An internal tracking system has been implemented at the Master Metals facility to track the furnace feedstock. Basically, at the end of each month, the operating log of the received material is matched to an inspection of the present inventory on-site. The monthly inventory form is enclosed for your review. A log of the material that is fed to the furnaces is then matched to the two other logs and thus the internal tracking system.

This program will be implemented by Doug VanRuskirk and reviewed by Doug Mickey.

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ENDING MONTHLY INVENTORY OF LISTED HAZARDOUS WASTES

DATE	GENERATOR COMPANY NAME	MATERIAL DESCRIPTION	MANIFEST #	EPA HAZ WASTE #	SHIPMENT VOL/WT	PHYSICAL STATE	TREATMENT CODE	LOCATION OF MATERIAL

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OEPA Listed Citation 5, 40 CFR 265.75

Enclosed is a copy of the form 8700-13B for 1987. The form was sent to the proper office.

OEPA Listed Citation 6, 40 CFR 265.112

At the present time Master Metals has a complete facility closure plan available on-site and registered at the EPA. Though the plan was written in 1986 and it may require some updating, the current closure plan will remain as the primary source of information on closure of the facility. A new closure plan will be prepared in the near future. Currently, this requirement is subject to the Federal Bankruptcy orders handed down from the court and is subject to negotiation with the Federal EPA. You can expect a new, updated closure plan for the facility, when final negotiations are completed and a timeframe has been formed.

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OHIO ENVIRONMENTAL PROTECTION AGENCY Action Code _____

FACILITY ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31, 19 87

..e information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-65-75 as applicable of the Ohio Administrative Code

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

I. FACILITY'S EPA I.D. NUMBER

T/AC

FOHD097613817 11

1 2 13 14 15

II. NAME OF FACILITY

MASTER METALS INC

30 67

III. FACILITY MAILING ADDRESS

3285 WEST THIRD STREET

15 16 45

Street or P.O. Box

4 CLEVELAND OH 44113

15 16 41 42 47 51

City or Town State Zip Code

IV. LOCATION OF FACILITY

5 2850 WEST THIRD STREET 18

15 16 45 47 48

County Code

6 CLEVELAND OH 44113 3312

15 16 41 42 47 51 53 56

City or Town State Zip Code Primary SIC Code

V. FACILITY CONTACT

2 DOUGLAS K. MICKEY 216-621-2361

15 16 45 46 55

Name (last and first) Phone No. (area code & no.)

VI. COST ESTIMATES FOR FACILITY

A. Cost Estimate for Facility Closure

$ 16 18 19 21 22 24

B. Cost Estimate for Post Closure Monitoring and Maintenance (disposal facilities only)

$ 25 27 28 30 31

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

DOUGLAS K. MICKEY	PRESIDENT	[signature]	10/26/88
Print/Type Name	Title	Signature of Authorized Representative	Date Signed

EPA 9020

OEPA Listed Citation 7, 40 CFR 265.143

The closure trust fund is based on the original agreement of the bankruptcy stipulation for the facility. The trust fund was created to cover all the costs of closure and to date, Master Metals has been ahead of schedule in meeting these payments. For the original agreement refer to the bankruptcy stipulation agreement of 1987.

OEPA Listed Citation 8, 40 CFR 265.171 and .173

Master Metals has received several new storage containers for the holding of hazardous waste. These are the large bin type containers you saw on earlier visits. The contents of the drums that are in poor condition have eighther been placed in these storage bins, or consumed in the furnace. All other drums have been singularly covered and the new storage bins have specially fitted tarps over the top of them.

11-3-88

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OEPA Listed Citation 9, 40 CFR 265.35

Master Metals is currently working on this problem and much of the aisle spacing has been opened. The work crews of the facility have been alerted to the problem of stacking drums and it has been conveyed to them that any new inventory will now be spaced no deeper than two drums. In addition, priority has been placed on clearing and maintaining good aisle spacing. Compliance schedule for full aisle spacing is set for December 1, 1988.

OEPA Listed Citation 10, 40 CFR 265.174 and .16

The designated safety/inventory inspector, Doug VanBuskirk, has recently been given a refresher training session regarding his inspection reports earlier this year. From your inspection it has become apparent that some deficiencies exist in the forms that the inspector uses. New forms have been created to more clearly address the issues of uncovered drums, spills, leaks and isle spacing. Enclosed are copies of the new forms.

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DAILY FACILITY INSPECTION FORM

INSPECTOR NAME:_____ DATE:_____

This inspection form must be filed DAILY as required by 40CFR Part265.15.

Master Metals must inspect the facility for malfunctions, deterioration, operator errors and discharges which may be causing or lead to; a release of hazardous materials to the environments, or a threat to human health & safety.

WASTE INVENTORY

PILES

	tarp condition			remedial action	action date
	good	fair	repair		
Battery Waste	____	____	_____	_____	_____
K069 Waste	____	____	_____	_____	_____
Lead Dross Waste	____	____	_____	_____	_____

STORAGE BINS

	tarp condition			remedial action	action date
	good	fair	repair		
Battery Waste	____	____	_____	_____	_____
K069 Waste	____	____	_____	_____	_____
Lead Dross Waste	____	____	_____	_____	_____

DRUM INVENTORY

	covered drum condition			remedial action	action date
	good	fair	repair		
Battery Waste	____	____	_____	_____	_____
K069 Waste	____	____	_____	_____	_____
Lead Dross Waste	____	____	_____	_____	_____

NOTE: ALL DRUMS ARE ASSUMED TO BE COVERED, MARK LOCATION OF REPAIR ITEMS IN REMEDIAL ACTION SECTION

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TRANSFER EQUIPMENT:

	******Equipment Condition*******			
	Good	Fair	Repair Required	Explain Repair
Towmotors	_____	_____	_____	_____
Material TransferShovel	_____	_____	_____	_____
Sweeper	_____	_____	_____	_____
Furnace Door	_____	_____	_____	_____

RELEASE INCIDENT

	location	action taken	date of action
any spills of chemicals?	_____	_____	_____
any leaks from containers?	_____	_____	_____
fallen over stock?	_____	_____	_____
uncovered items?	_____	_____	_____
OTHER ITEMS?	_____	_____	_____

persons involved _____

_____

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OEPA Listed Citation 11, 40 CFR 265.253 and .251

In accordance with the original stipulation agreement, Master Metals was required to provide storage bins to replace the waste piles on the property. The company has already bought more than the originally agreed to number of bins, and more are ordered. In the interim, Master Metals has provided heavy gauge tarps to cover the waste piles. These tarps are weighted down by vehicle tires that are connected together by rope. As soon as the new storage bins are received, these piles will be incorporated into them and covered. Please refer to the original stipulation agreement of September 1987 for imput on your last comment of this citation.

OEPA Listed Citation 12, Revised Part A Application

An updated Part A application has been completed and submitted to the pertinent office. A copy is enclosed for your review.

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(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F OHD097613871

LABEL ITEMS

I. EPA I.D. NUMBER

II. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
B. Does or will this facility (*either existing or proposed*) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility (*other than those described in A or B above*) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP MASTER METALS INC

IV. FACILITY CONTACT

A. NAME & TITLE (*last, first, & title*)	B. PHONE (*area code & no.*)		
2 MICKEY DOUGLAS PRESIDENT	216	621	2361

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 2850 WEST THIRD STREET

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 CLEVELAND	OH	44113

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 2850 WEST THIRD STREET

B. COUNTY NAME

CUYAHOGA

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (*if known*)
6 CLEVELAND	OH	44113	

CONTINUED FROM THE FRONT

VII. SIC CODES (if any, in order of priority)

A. FIRST	B. SECOND
7 (specify) SECONDARY SMELTING OF NON FERROUS METALS	7 (specify)
C. THIRD	**D. FOURTH**
7 (specify)	7 (specify)

VIII. OPERATOR INFORMATION

A. NAME: 8 MASTER METALS INC

B. Is the name listed in Item VIII-A also the owner? ☐ YES ☐ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC (other than federal or state)
O = OTHER (specify)
(specify)

D. PHONE (area code & no.): A 216 621 2361

E. STREET OR P.O. BOX: 2850 WEST THIRD STREET

F. CITY OR TOWN	G. STATE	H. ZIP CODE
B CLEVELAND	OH	44113

IX. INDIAN LAND
Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
9 N	9 P
B. UIC (Underground Injection of Fluids)	**E. OTHER (specify)**
9 U	9 (specify)
C. RCRA (Hazardous Wastes)	**E. OTHER (specify)**
9	9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

THIS FACILITY RECEIVES LEAD SCRAP WHICH IS RECYCLED THROUGH THE USE OF A ROTARY FURNACE TO PRODUCE METALLIC LEAD

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
DUGLAS K. MICKEY, PRESIDENT	[signature]	[illegible]

COMMENTS FOR OFFICIAL USE ONLY

C

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

F O H O C 9 7 6 1 3 8 7 1 — T/A: 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C 8 — YR. 3 2 — MO. 0 6 — DAY 0 5

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR. — MO. — DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[X] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code*(s)* in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C — DUP — T/A: 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 3	822	Y		7				
2	S 0 3	938	Y		8				
	S 0 3	576	Y		9				
4	S 0 1	1152	Y		10				

PROCESSES *(continued)*

SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

T04-8 Line 8 Represents the Rotary Furnace process where all lead bearing material received at the plant are recycled to produce metallic lead. The materials received are never stored longer than 90 days prior to entering furnace.

T04 - Line 9 Represents pot furnaces (kettles) where some materials received are melted into metallic lead ingots. By-products are recycled to the furnace mentioned above.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

cility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into unt the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each listed hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 00 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-	0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
W O H D 0 9 7 6 1 3 8 7 1 — T/A: C: 1	W DUP — T/A: C: 2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

W	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	K 0 6 9	1400	T	T 0 4	
2	D 0 0 8	6000	T	T 0 4	
3	D 0 0 8	5000	T	T 0 4	
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

Continued from the front.

V. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. *(enter from page 1)*

S												T/A	C
F	0	A	D	0	9	7	6	1	3	8	7	1	6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail)*.

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail)*.

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
81 40 033	041 28 026

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E MI	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

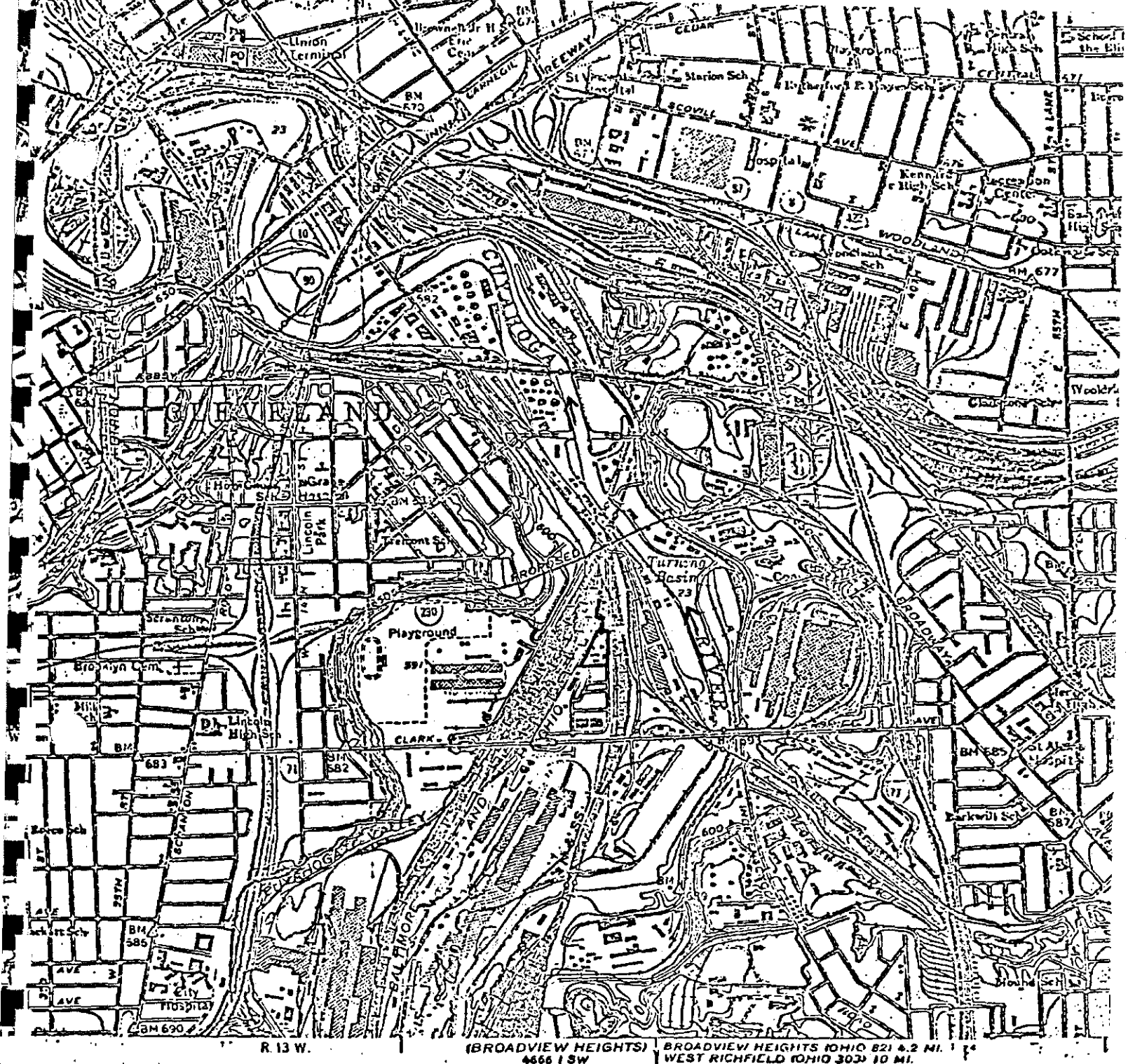
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Douglas K. Mickey	[signature]	10/26/85

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
DOUGLAS K. MICKEY	[signature]	10/26/85



SCALE 1:24000

1 ½ 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

MN GN

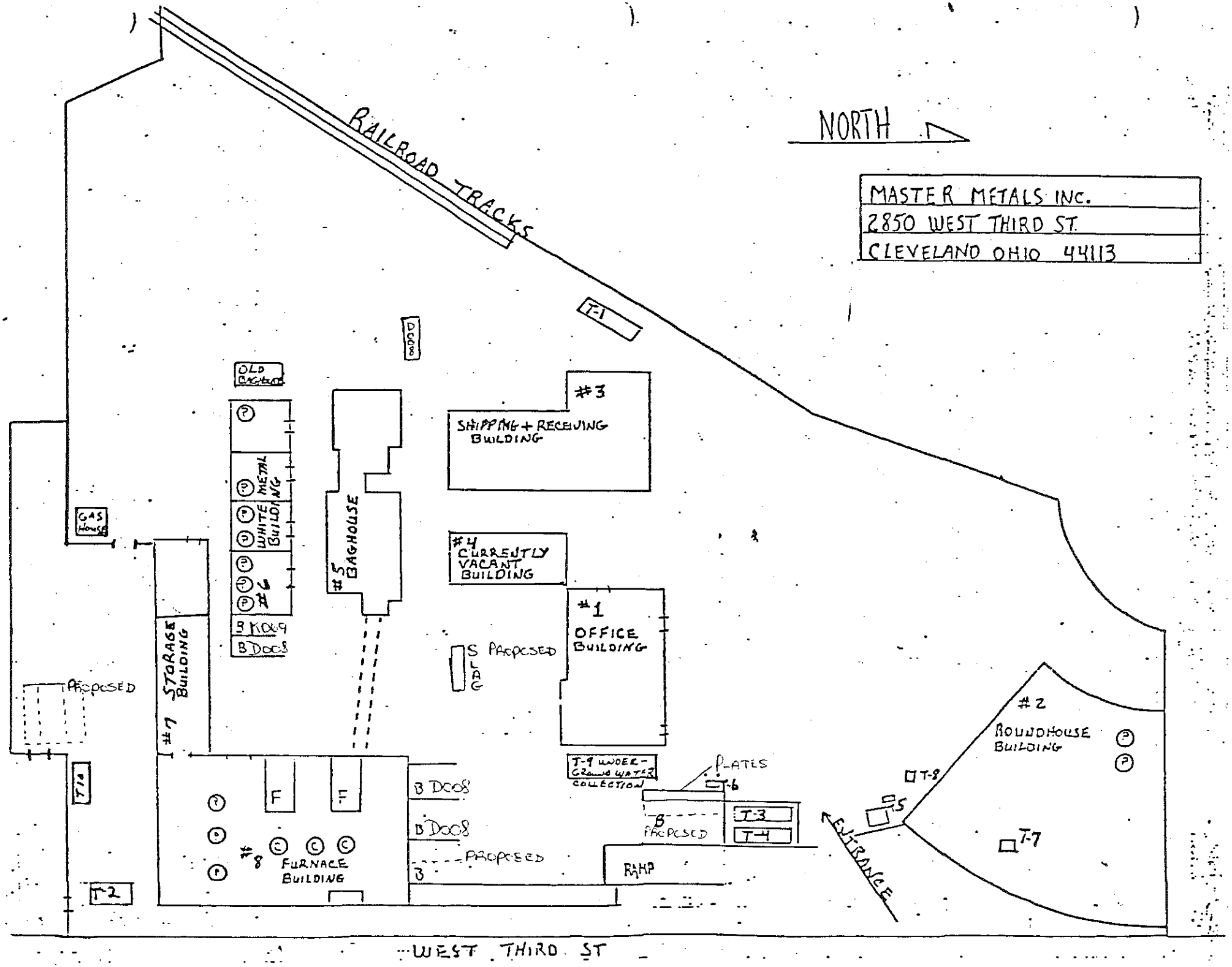
4° 71 MILS 0°27' 8 MILS

...ND AND 1970 MAGNETIC NORTH ...IN AT CENTER OF SHEET

CONTOUR INTERVAL 10 FEET
DATUM IS MEAN SEA LEVEL
DEPTH CURVES AND SOUNDINGS IN FEET—DATUM IS LOW WATER 570.5 FEET

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U. S. GEOLOGICAL SURVEY, WASHINGTON, D. C. 20242
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

Revisions show
State of Ohio
1970. This i
Purple tint



NORTH
MASTER METALS INC.
2850 WEST THIRD ST.
CLEVELAND OHIO 44113
RAILROAD TRACKS
T-1
D008
OLD BAGHOUSE
#3
SHIPPING + RECEIVING BUILDING
WHITE METAL BUILDING
#6
B K069
B D008
#5 BAGHOUSE
GAS HOUSE
#4 CURRENTLY VACANT BUILDING
#1 OFFICE BUILDING
S LAG
PROPOSED
#7 STORAGE BUILDING
PROPOSED
T-10
T-2
F
F
#8 FURNACE BUILDING
B D008
B D008
PROPOSED
B
T-9 UNDER-GROUND WATER COLLECTION
PLATES
T-6
B PROPOSED
T-3
T-4
RAMP
ENTRANCE
#2 ROUNDHOUSE BUILDING
T-8
5
T-7
WEST THIRD ST

OEPA Listed Citation 13, Furnace Slag Pile

As stated in citation 11, the facility has ordered several new bins to store material. One bin will be designated especially for storage of the nonhazardous furnace slag. During the interim, better waste segregation practices are in effect such as storing the furnace slag in an area where it is unable to mingle with furnace feedstock.

OEPA Listed Citation 14, Storage Bins

As stated before, the new, and old storage bins, are now equipped with heavy duty custom made tarps to protect the contents form wind dispersal and precipitation. The bins are now labeled with the words "HAZARDOUS WASTE-D008" or in the case of flue dust "K069". Recently, a company meeting was called to address, among other things, proper tarping procedures and the importance of keeping the binds covered at all times, a class roster is included for your review. Photographs of these bins are also enclosed for your review.

Envisage
Environmental
Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

MASTER METALS, INC., 2850 W. THIRD ST., CLEVELAND, OHIO 44113 • (216) 621-2361

Lead Smelter and Refiner

We have been instructed on proper use of tarps on containers.

Joe Seldon _____

Doug VanBuskirk _____

Kevin Blazetic _____

Fred Jenkins _____

Johnny Walker _____

R. Holmes _____

R. Large _____

Ray Brown _____

J. Fluker _____

R. Robinson _____

R. Bailey _____

J. Seldon _____

Johnny Farrier _____

Robert G. _____

Dennis Hankish _____

S. Lawrence _____

W. Ballard _____

M. Larkin _____

G. VanBuskirk _____

L. Campbell _____

L. Pulley _____

J. Wright _____

T. Helms _____

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

TRAINING RECORD

DATE OF TRAINING: [illegible]

ATTENDED BY (Job Description): [illegible]

SUBJECT OF TRAINING SESSION: [illegible]

TRAINING MATERIALS UTILIZED: [illegible]

TRAINING CONDUCTED BY: [illegible]

NOTES:

1) Attendance Sheet is attached.

2) Trainer Qualification Sheet is attached.

3) _____

Signature of Trainer [illegible] Date: 10/20/88

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

TRAINING RECORD

DATE OF TRAINING: 10/20/88

ATTENDED BY (Job Description): [illegible]
Environmental [illegible]

SUBJECT OF TRAINING SESSION: [illegible]
[illegible]

TRAINING MATERIALS UTILIZED: [illegible]

TRAINING CONDUCTED BY: [illegible]

NOTES:

1) Attendance Sheet is attached.

2) Trainer Qualification Sheet is attached.

3) _____

Signature of Trainer [signature] Date: 11-20-88

Envisage
Environmental
Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

TRAINING RECORD

DATE OF TRAINING: 10/20/88

ATTENDED BY (Job Description): [illegible]
CLERK

SUBJECT OF TRAINING SESSION: [illegible]
HAZARDOUS WASTE

TRAINING MATERIALS UTILIZED: Outline Sheet

TRAINING CONDUCTED BY: Sada Engen

NOTES:

1) Attendance Sheet is attached.

2) Trainer Qualification Sheet is attached.

3) _____

Signature of Trainer: Sada Engen Date: 10-20-88

11-3-88

11-3-88

11-3-88

OEPA Listed Citation 15, Flammable Waste Stream

The drummed containers that you saw indicating flammable waste-D001, was infact a mislabeld waste stream. The material is D008 waste from the Sedalia facility. According to the management at Master Metals, historically this waste has always come into the facility as D008. Due to a personnel change at Alcolac, the individuals responsible for labeling the waste mislabeld the drums as D001 when infact it should have been D008. After realizing the mistake, Master Metals relabeld the drums D008 and currently they have all been consumed. Having the discrepancy settled, Master Metals has taken the steps to see that this type of mix-up never happens again.

Envisage
Environmental
Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

OEPA Listed Citation 16, Labeling of Containers

Since your last visit, Master Metals has purchased several boxes of "HAZARDOUS WASTE" labels for inventory that has missing or corroded labels. The compliance schedule in having all drums with missing lables will be December 1, 1988. In the future, during inspections it will be noted that any drums that do not have proper labels, will be issued a hazardous waste sticker. The stickers will be properly filled out as to the EPA number and waste description.

OEPA Listed Citation 17, Security Fence.

Since your last visit, the fence that you indicated in your letter is now equipped with a "skirt" that properly protects against any unauthorized entry to the premises. Photos of the skirt are enclosed for your review.

11-3-88

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

OEPA Listed Citation 18, Spillage

The puddle of liquid that appeared to be alkaline was the result of standing water mixing with soda ash that had spilled. To rectify this situation, Master Metals has contracted a company to clean out all the drains on the property. With all the drains functioning properly, no standing water will remain on the ground and if a spill of flake soda ash ever occurs again, the employees will notice it and clear up the problem immediately. This is an unfortunate instance and the employees were told during the company meeting that this type of lack of responsibility will not be tolerated. Furthermore, the soda ash storage area has been moved to a more secure area.

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

OEPA Listed Citation 19, Underground Tank

At this time we are still assessing the status of the underground storage tank system at the facility. According to 40 CFR Subpart J, the storage of hazardous waste in tanks for TSD facilities, an interstitial monitoring and/or secondary containment system is required. At this time the original engineering blueprints are requested and we are waiting for data in order to fully assess what upgrading is needed, if any. Please expect a full description and rational about our position on this item soon.

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

ENVISAGE ENVIRONMENTAL INCORPORATED
P. O. Box 152, Richfield, Ohio 44286
Phone (216) 526-0990

REPORT NO. 2610CA
COMPANY Master Meta
TITLE
DATE 10-20-87

MASTER METALS INC.
CLEVELAND, OHIO

OEPA RESPONSE REPORT

SUBMITTED - OCTOBER 20, 1987

RECEIVED
OCT 22 1987
U.S. EPA REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT GRP

Envisage Environmental Incorporated P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

October 23, 1987

Mr. Dale Helmers
Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinos 60604

RECEIVED
OCT 26 1987
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

Dear Mr. Helmers:

Enclosed you will find the correct letter for the Master Metals Response Report. The report was previously mailed to you with an incorrect letter dated April, 1987. Please replace the April dated letter with the one dated October 20, 1987.

I regret any inconvenience this may have caused you.

Sincerely,

Audrey L. Weiss

Audrey L. Weiss
Office Manager
ENVISAGE ENVIRONMENTAL INC.

Enclosure

MASTER METALS, INC., 2850 W. THIRD ST., CLEVELAND, OHIO 44113 • (216) 621-2361

Lead Smelter and Refiner

April 14, 1987

Mr. Mark Bergman
Div of Solid & Hazardous Waste Mgt
Ohio Environmental Protection Agency
2110 East Aurora Road
Twinsburg, Ohio 44087

Mr. Bergman,

Master Metals is willing to cooperate with the agency to solve the compliance issues arising from the OEPA inspection conducted on March 05, 1987 by Mr. Mark Bergman of the Twinsburg office.

To this end, we are submitting this response and proposal, which addresses the storage and handling of industrial lead-acid batteries at the facility.

Also included in this mailing is a copy of the report, "An Impending Crisis". This article will provide you with an overall perspective of the Secondary Lead Smelting Industry. This study points out the importance of recycling lead-acid batteries.

I would like to take this opportunity to thank you for attending the 03-30-87 meeting at the Master Metals facility. These meetings are invaluable and will assist us in making progress toward addressing and solving compliance issues at our facility.

If you have any questions regarding this proposal, please feel free to call me. We are available to meet with you at any time to discuss this proposal.

Respectfully Submitted,

Douglas K. Mickey
President

Encl: Master Metals Response Report
Permit to Operate #0-3408
Article: "An Impending Crisis

cc: Mr. Dale Helmers, USEPA - Region V
Ms. Mary Logan, USEPA - Region V
Mr. Gary Neid, Division of Air Pollution Control
Mr. David K. Munson, Envisage Environmental

MASTER METALS

RESPONSE REPORT

10-16-87

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

Date Submitted: October 20, 1987

Master Metals is submitting this response to the issues raised during the September 01, 1987 inspection of our facility by Mr. Mark Bergman of the OEPA, Twinsburg Office.

Each concern is addressed numerically in the order received in the OEPA letter. Appropriate documentation is included.

1) Personnel Training: During September/October 1987, training programs were updated at the Master Metals facility. Training sessions topics included; safe handling of lead wastes, proper manifesting, waste analysis plan and implementation of the operating record. Training records are enclosed in this section.

Attendance sheet records are maintained at the facility, along with the enclosed description of training sheets.

COPY

TRAINING RECORD

DATE OF TRAINING: 09-24-87

ATTENDED BY (Job Description): Laboratory Personnel

SUBJECT OF TRAINING SESSION: Waste Analysis Plan, Hazardous Waste Sampling procedures and Waste Survey Form

TRAINING MATERIALS UTILIZED: Waste Analysis Plan, Waste Analysis Plan requirements per 40CFR Part 265.13

TRAINING CONDUCTED BY: David K. Munson, Regulatory Compliance Specialist, ENVISAGE ENVIRONMENTAL, INC.

NOTES:

1) Attendance Sheet is attached.

2) Trainer Qualification Sheet is attached.

3) _____

4) LENGTH OF SESSION: 1 1/2 HOURS

Signature of Trainer David K Munson Date: 9-24-87

COPY

TRAINING RECORD

DATE OF TRAINING: 09-24-87

ATTENDED BY (Job Description): Environmental Clerks, Mr. Milton Blake and Ms. Kathryn Zenhert

SUBJECT OF TRAINING SESSION:

1) Uniform Hazardous Waste Manifest Procedures

2) Operating Record Procedures

TRAINING MATERIALS UTILIZED: Existing Manifests, Manifesting procedures per 40CFR Part 265 Subpart E and 40CFR Part 262, Appendix. Also, Operating Record procedures per 40CFR Part 265.73

TRAINING CONDUCTED BY: David K. Munson, Regulatory Compliance Specialist, ENVISAGE ENVIRONMENTAL, INC.

NOTES:

1) Attendance Sheet is attached.

2) Trainer Qualification Sheet is attached.

3)

4) LENGTH OF SESSION: 2 ½ HOURS

Signature of Trainer David K Munson Date: 9-24-87

COPY

TRAINING RECORD

DATE OF TRAINING: 10-01-87

ATTENDED BY (Job Description): Sales - Steven Abrahms
Environmental Clerk - Milton Blake

SUBJECT OF TRAINING SESSION: Waste Profile Form and its importance to RCRA requirements, new customers, sample identification. The sales personnel must understand the use of this form.

TRAINING MATERIALS UTILIZED: Verbal presentation with a step-by step explanation of every question of the Waste Profile Form.

TRAINING CONDUCTED BY: David K. Munson, Envisage Environmental

NOTES:

1) Attendance Sheet is attached.

2) Trainer Qualification Sheet is attached.

3) _____

Signature of Trainer David K Munson Date: 10-01-87

COPY

TRAINING RECORD

DATE OF TRAINING: 10-08-87

ATTENDED BY (Job Description): All Plant and Manufacturing Employees

SUBJECT OF TRAINING SESSION: The following subjects were covered: Use of mandatory personal safety equipment, including gloves and dust respirators in order to protect against exposure to lead hazards when handling waste materials. Also, industrial practices which will lessen exposure including vacuuming clothes washing hands, and taking shower at the end of each work day. Also, explanation of Blood-lead program occurred.

TRAINING MATERIALS UTILIZED: Verbal presentation with examples of safety equipment.

TRAINING CONDUCTED BY: Mr. William Fink

NOTES:

1) Attendance Sheet is attached.

2) Trainer Qualification Sheet is attached.

3) _____

_____

4) LENGTH OF SESSION: 1/2 HOUR

Signature of Trainer W. E. Fink Date: 10-8-87

2) Job Descriptions: Job Descriptions for employees involved in the management and handling of hazardous wastes have been revised to include all personnel at the Master Metals facility. The revised Job Description section is enclosed.

JOB DESCRIPTIONS

The job classifications at Master Metals facility which require employees to have a **working knowledge of RCRA** requirements are:

-President
-Sales Personnel
-Environmental Clerk
-Laboratory Manager
-Plant Manager

The job classifications at Master Metals facility which require employees to **handle regulated materials** in the facility are:

-Shipping/Receiving
-Furnace Operator
-Alloy & Refining Operator
-Laborer

President: The President is responsible for overseeing all operations and personnel at the Master Metals facility.

Sales Personnel: The Sales personnel are responsible for interacting with the existing and potential customers, which send hazardous and non-hazardous waste materials to the facility for reclamation. As part of this responsibility, they inform the customer that, prior to the first shipment of material, a Waste Survey Form must be completed.

Environmental Clerk: The Environmental Clerk is responsible for organizing and maintaining records, as required by 40CFR Part 265. These records include:

* Operating Record
* Facility Inspection Logs
* Manifests
* TSDF Annual Report
* Waste Survey Form
* Training Records

The Environmental Clerk is authorized to review and sign Uniform Hazardous Waste Manifests.

Laboratory Manager: The Laboratory Manager is familiar with the procedures set forth in the Waste Analysis Plan. This includes Sampling Procedures for hazardous and non-hazardous waste shipments, analytical techniques, and interpreting data submitted on the Waste Profile Survey. He is responsible for sampling each shipment, labelling the retained samples, performing verification testing on arriving shipments of hazardous waste, and maintaining the Arriving Shipment Analysis Record.

Job Descriptions(continued)

Plant Manager: The Facility Inspection Logs are implemented by the Plant Manager on a daily and weekly basis. He has extensive experience at and familiarity with the facility, therefore is qualified to perform the required in-plant inspections.

Once completed, the Inspection Forms are signed, dated and returned to the Environmental Clerk.

If a malfunction or potential problem is discovered during the inspection, the Plant Manager has the appropriate authority to remedy the problem.

Shipping/Receiving Personnel: These employees are responsible for receiving the shipments of regulated and non-regulated wastes into the facility. They are aware of the designated storage areas for each type of arriving waste. Safe unloading and transferring are key issues in handling of these waste materials by unloading personnel.

Furnace Operator: This operator is responsible for the operation of the rotary kiln furnace. The operator is responsible for transferring the regulated and non-regulated waste materials from their respective storage areas to the furnace for processing.

At the furnace, the lead-containing waste materials are fed into the furnace for recovery. The lead components are heated and the resulting "melt" collected for further processing in the Alloy & Refining Area.

The furnace operator is also responsible for the operation of the emission control baghouse.

Alloy & Refining Operator: The recovered melt is transferred to a heating pot for further refinement. Process chemicals and alloy materials are added to meet quality control and customer specifications.

The "lead dross" generated in these refinement pots is recycled into the rotary kiln furnace for reprocessing.

Laborer: These employees work in all areas of the facility. These employees are responsible for maintaining cleanliness, sweeping and doing odd jobs.

SENIORITY LIST 9/1/87

Date of Hire	Clock No.	Job Classification	Name
10/13/54	52	Alloy & Refining	Ballard, Wenners
5/20/55	42	Casting	Campbell, Lee
8/19/68	63	Press Operator	Hickerson, Ellsworth
4/22/71	26	"	Hilton, Tyrone
5/17/73	77	"	Smith, Robert
9/1/84	216	Rotary Furnace Operator	Gordnoshnka, Robert
9/10/84	3	"	Brown, Ray
3/16/87	220	Maintenance	Jenkins, Fred
3/31/87	6	Rotary Furnace Operator	Walker, John
11/10/87	16	"	Robinson, Robert
11/10/87	30	Shipping & Receiving	Wright, Joseph
/22/87	14	Stacker	Large, Robert
4/20/87	33	Shipping & Receiving	Pulley, Lawrence

Joseph Seldon	Plant Manager
James Fluker	Foreman
Otto Lawrence	Foreman
Doug VanBuskirk	Probationary Employee
Douglas K. Mickey	President
Jerry L. Moody	Vice President
James Ammons	Chemist
Kathy Zenkert	Accountant
Susan Yost	Telephone Opr.
M[illegible]n Blake	Clerk
Steve Abrams	Buyer

3) Posted Signs: The appropriate warning signs have been ordered for use at the facility. As soon as they are received, the signs will be posted at all entrances and at the perimeters in intervals of 75 feet.

4) Inspection Plan: Enclosed is the Inspection Plan for the Master Metals facility. It describes the inspection areas and frequencies.

INSPECTION PLAN

Overview: The Inspection procedures for the Master Metals facility are documented in this section. Inspections are conducted on a daily and weekly basis per requirements in 40CFR Part 265.15. The inspections are conducted by the Plant Manager. The Inspection Forms, once completed, are returned to the Environmental Clerk for documentation.

Daily Facility Inspection: A daily inspection occurs on handling equipment and in areas of the plant where hazardous materials are handled on a daily basis.

The inspection includes all Waste Piles and material "handling equipment, such as; towmotors, transfer shovel, sweeper and furnace doors.

During this inspection, the inspector must inspect the facility for malfunctions, deterioration, operator errors and discharges which may be causing or lead to; a release of hazardous materials to the environment, or a threat to human health & safety.

Once the container storage plan is implemented, the containers and storage pads will be include in the "daily" inspection. The Daily Facility Inspection Form is enclosed with this plan.

Weekly Facility Inspection: A weekly inspection of the Master Metals facility is also conducted. This inspection focuses on facility structure and the drum storage area. The main items included on this form are:

- Drum Storage Area
- Concrete Surfaces
- Emission Control System
- Security Systems

The Inspector must inspect the facility for malfunctions, deterioration, operator errors and discharges which may be causing or lead to; a release of hazardous materials to the environments, or a threat to human health & safety.
The Weekly Facility Inspection Form is enclosed with this plan.

Safety Inspections: All equipment required for the safe and proper handling of hazardous materials is inspected on a weekly basis. The inspector will inspect the facility in order to; assure safety and emergency equipment inventory, confirm safety equipment use, and maintain a safe working environment.

This inspection includes; Fire Extinguishers, Safety Equipment Inventory, Communication System, and Facility Lighting.
The Safety Inspection Form is enclosed with this plan.

5) Inspection Records: The facility is inspected on a daily and weekly basis, as explained in the Inspection Plan. Blank Inspection Forms, along with an implemented form, are enclosed in this section.

DAILY FACILITY INSPECTION FORM

INSPECTOR NAME:_____ DATE:_____

This inspection form must be filed DAILY as required by 40CFR Part 265.15. Master Metals must inspect the facility for malfunctions, deterioration, operator errors and discharges which may be causing or lead to; a release of hazardous materials to the environments, or a threat to human health & safety.

WASTE PILES:

	Tarp Condition		Retaining Walls		
	Good	Replace	Good	Repair	NOTES
Battery Waste Pile	_____	_____	_____	_____	_____
K069 Waste Pile	_____	_____	_____	_____	_____
Lead Dross Waste Piles	_____	_____	_____	_____	_____

TRANSFER EQUIPMENT:

	******Equipment Condition*******			
	Good	Fair	Repair Required	Explain Repair
Towmotors	_____	_____	_____	_____
Material Transfer Shovel	_____	_____	_____	_____
Sweeper	_____	_____	_____	_____
Furnace Door	_____	_____	_____	_____

WEEKLY FACILITY INSPECTION FORM

INSPECTOR NAME:_____ DATE:_____

This inspection form must be filed WEEKLY as required by 40CFR Part 265.15. Master Metals must inspect the facility for malfunctions, deterioration, operator errors and discharges which may be causing or lead to; a release of hazardous materials to the environments, or a threat to human health & safety.

	**** CONDITION ***			
	Good	Fair	Repair	Describe_____
DRUM STORAGE AREA:				
Aisle Space/Access	____	____	_____	_____
Condition of Drums	____	____	_____	_____

Are any containers open, falling, punctured or leaking? YES NO

If Yes, Describe:_____

Are all containers labelled with the Receiving Number? YES NO

If No, Describe:_____

CONCRETE SURFACES:				
Drum Storage Area	____	____	_____	_____
Road/Aisleways	____	____	_____	_____
Furnace Loading Area	____	____	_____	_____
EMISSION CONTROL SYSTEM:				
Furnace Air Ducts	____	____	_____	_____
Alloy Mixing Pots Hoods	____	____	_____	_____
Air Ducts to Baghouse	____	____	_____	_____
Baghouse.....Fan	____	____	_____	_____
.....Walls	____	____	_____	_____
.....Bags	____	____	_____	_____
SECURITY SYSTEM:				
Security Fences: -Northern	____	____	_____	_____
-Southern	____	____	_____	_____
-Eastern	____	____	_____	_____
-Western	____	____	_____	_____
Warning Signs	____	____	_____	_____
Main Gate & Entrance	____	____	_____	_____
Outdoor Lighting	____	____	_____	_____

WEEKLY FACILITY INSPECTION FORM

INSPECTOR NAME: Doug Mickey DATE: 10/2 [illegible]

This inspection form must be filed **WEEKLY** as required by 40CFR Part 265.15. Master Metals must inspect the facility for malfunctions, deterioration, operator errors and discharges which may be causing or lead to; a release of hazardous materials to the environments, or a threat to human health & safety.

	**** CONDITION ***			
	Good	Fair	Repair	Describe
DRUM STORAGE AREA:				
Aisle Space/Access	/			
Condition of Drums	/			

Are any containers open, falling, punctured or leaking? YES (NO)

If Yes, Describe: _____

Are all containers labelled with the Receiving Number? YES (NO)

If No, Describe: _____

CONCRETE SURFACES:				
Drum Storage Area	/			
Road/Aisleways	/			
Furnace Loading Area			/	
EMISSION CONTROL SYSTEM:				
Furnace Air Ducts	/			
Alloy Mixing Pots Hoods		/		
Air Ducts to Baghouse	/			
Baghouse.....Fan	/			
.....Walls	/			
.....Bags	/			
SECURITY SYSTEM:				
Security Fences: -Northern			/	FROM AMMONIA TANK TO [illegible]
-Southern				
-Eastern				
-Western				
Warning Signs	/		/	SP ORDERED
Main Gate & Entrance	/			
Outdoor Lighting		/		

DAILY FACILITY INSPECTION FORM

This inspection form must be filed DAILY as required by 40CFR Part 265.15. Master Metals must inspect the facility for malfunctions, deterioration, operator errors and discharges which may be causing or lead to; a release of hazardous materials to the environments, or a threat to human health & safety.

WASTE PILES:

	Tarp Condition Good	Replace	Retaining Walls Good	Repair	NOTES
Battery Waste Pile		/		/	
K069 Waste Pile	/		/		
Lead Dross Waste Piles		/	/		

TRANSFER EQUIPMENT:

	******Equipment Condition******* Good	Fair	Repair Required	Explain Repair
Towmotors	/			
Material Transfer Shovel	/			
Sweeper	/			
Furnace Door	/			

Doug Van Buskirk 10-9-87

6) Safety Equipment Inspections: The safety equipment is inspected on a weekly basis and documented on the Safety Equipment Inspection Form. A blank form is enclosed.

SAFETY INSPECTION FORM

INSPECTOR NAME:_____ DATE:_____

This inspection form must be filed WEEKLY as required by 40CFR Part 265.15. Master Metals must inspect the facility in order to; assure safety and emergency equipment inventory, confirm safety equipment use, and maintain a safe working environment.

FIRE EXTINGUISHERS:

Are all fire extinguishers charged to the "FULL" designation? YES NO

If NO, Describe:_____

SAFETY EQUIPMENT INVENTORY:	**CONDITION*		****INVENTORY****	
	Good	Fair	In-stock	Reorder
First Aid Stations	_____	_____	_____	_____
Fire Blankets	_____	_____	_____	_____
Emergency Showers	_____	_____	_____	_____
Eye Wash Stations	_____	_____	_____	_____
PAPR Systems	_____	_____	_____	_____
Disposable Dust Respirators.....			_____	_____
Cotton Gloves.....			_____	_____

COMMUNICATION SYSTEM:

Is the facility "paging" system operational?..... YES NO

If NO, Describe:_____

WORKSTATION LIGHTING:	**** CONDITION ***			
	Good	Fair	Repair	Describe_____
Extrusion Area	____	____	_____	_____
Furnace Area	____	____	_____	_____
Alloy Pot Areas	____	____	_____	_____
Laboratory Area	____	____	_____	_____
Small Batch Pot Area	____	____	_____	_____
Shipping/Receiving Dock	____	____	_____	_____
Maintenance	____	____	_____	_____

SAFETY INSPECTION FORM

INSPECTOR NAME: Doug VanBuskirk DATE: 10-9-87

This inspection form must be filed ~~DAILY~~ as required by 40CFR Part 265.15. Master Metals must inspect the facility in order to; assure safety and emergency equipment inventory, confirm safety equipment use, and maintain a safe working environment.

FIRE EXTINGUISHERS:

Are all fire extinguishers charged to the "FULL" designation? YES NO

If NO. Describe: _____

SAFETY EQUIPMENT INVENTORY:	**CONDITION* Good	Fair	****INVENTORY**** In-stock	Reorder
First Aid Stations		✓		✓
Fire Blankets		✓		
Emergency Showers		✓		
Eye Wash Stations		✓		
PAPR Systems		✓		
Disposable Dust Respirators.....			✓	
Cotton Gloves.....			✓	

COMMUNICATION SYSTEM:

Is the facility "paging" system operational?..... YES NO

If NO, Describe: _____

WORKSTATION LIGHTING:	**** CONDITION *** Good	Fair	Repair	Describe
Extrusion Area	✓			
Furnace Area		✓		
Alloy Pot Areas		✓		
Laboratory Area		✓		
Small Batch Pot Area		✓		
Shipping/Receiving Dock	✓			
Maintenance			✓	Bulbs

7) Contingency Plan: The Contingency Plan has been revised to include the addresses of the Emergency Coordinators and a revised list of emergency equipment.

The Contingency Plan has been sent to local and state emergency authorities, but the agreement letters have not been received back. Once received by Master Metals, the agreement letters will be filed with the Contingency Plan.

October 12, 1987

ABC Company
East 123 Street
Cleveland, OH 44100

Subject: Master Metals Inc. Contingency Plan

Dear Sir or Madam,

Enclosed you will find a copy of the Contingency Plan for the Master Metals facility, located at 2850 West 3rd Street, Cleveland, Ohio.

The RCRA requirements per 40CFR Section 265.53(b) requires that we "submit to all local Police Departments, Fire Departments, Hospitals, and Emergency Response agencies" a copy of this Plan.

Please review our submittal and return this letter with the appropriate required signature below. Thank you for your time and cooperation in this matter.

Respectfully submitted,

Douglas K. Mickey
President

Encl: Contingency Plan

Response Cooperation Agreement:

This agency/company is willing to cooperate with the Master Metals personnel and will respond, if our services are requested, to an emergency situation at the facility.

Authorized Signature:_____

Printed Name:_____ Date:_____

CONTINGENCY PLAN

MASTER METALS INC.

2850 West 3rd Street
Cleveland, Ohio 44113

(216)-231-2361

CONTINGENCY PLAN

The contingency plan which describes the actions facility personnel will take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.

1. GENERAL INFORMATION

a. Facility Name and Address:
Master Metals Inc.
2850 West Third Street
Cleveland, Ohio 44113

b. Operator: Douglas Mickey
Work phone: 216-621-2361
Home phone: 216-886-4333

c. Site Plan (see enclosed map)

d. Description of Facility Operations:
The nature of the business involves recovering nonferrous metals and alloys from new and used scrap and dross. This facility receives lead by-products which are recycled through the use of a rotary furnace to produce metallic lead. Lead flue dust is obtained from other secondary lead smelters and refiners (SIC 3341) to be added as one component to the total recycled lead composite.

2. EMERGENCY COORDINATORS

1. Douglas Mickey
12264 Lathe Bluffs
Strongsville, Ohio 44136
Work phone: 216-621-2361
Home phone: 216-886-4333

2. Otto Lawrence
4066 East 153 Street
Cleveland, Ohio 44128
Office phone: 216-886-4333
Home phone: 216-921-0213

The emergency coordinator is Douglas Mickey, who is on call or able to respond to an emergency by reaching the facility within a short period of time. The emergency coordinator and the assistant coordinator have the responsibility for coordinating all emergency response measures. Mr. Mickey is the owner and operator of Master Metals. Therefore, the authority to commit the resources needed to carry out the contingency plan are within the control of the emergency coordinator: Douglas Mickey.

3. IMPLEMENTATION

The contingency plan will be implemented if the emergency coordinator determines that the facility is in danger of a spill, fire or explosion.

4. EMERGENCY RESPONSE PROCEDURES

Whenever there is an imminent or actual emergency situation, the emergency coordinator will notify all facility personnel via the internal facility communication system.

In case of a power outage, and "other" causes for violations from visible emissions, all personnel in the affected areas shall reassemble in a designated safe area, and appropriate EPA officials notified.

4a. NOTIFICATION

Plant Communication: Master Metals uses as public address communications system with loud speakers located throughout the plant. In case of an emergency, announcements will be made to warn all personnel.

Community Communications: Master Metals has a list of organizations to call in the event of an emergency or release of toxic material (see emergency number chart).

Arrangements with local authorities, the police, fire and emergency response teams will be provided with a layout of the facility identifying the types of hazardous waste handled, places where workers are normally working, facility entrances, evacuation routes, and process operations. The hazard classifications will also be identified. Special protective equipment will also be noted to avoid exposure to lead fumes and dust.

Arrangements have been made with the local fire departments concerning the hazards associated with the Master Metals facility. Master Metlas is currently involved with a Right to Know Program with the Fire Prevention Bureau of the City of Cleveland. The program will involve a complete notification program with the Fire Prevention Bureau which will identify locations at Master Metals where safety equipment, personel, and hazards are located. The Right to Know Program will also entail a site visitation by fire department officials to become familiar with access routes, high risk areas and fire fighting equipment.

4b. IDENTIFICATION OF HAZARDOUS MATERIALS

The lead flue dust and lead acid batteries are the hazardous waste handled at the Master Metals facility. The characteristic grey flue dust and batteries can easily be identified in the case of an emergency.

4c. ASSESSMENT

The emergency coordinator will assess all possible hazards to human health or the environment that may result from the release, fire, or explosion. The assessment will consider both direct and indirect effects of the release, fire, or explosion.

The hazard assessment policy will be made on an individual basis as the situation requires. The Emergency Coordinator and appropriate management personnel will assess each condition for:

> Potential hazard to human health, environmental degragation, and community esthetics.

After thorough consideration, appropriate action will be taken and the proper authorities will be notified.

4d. CONTROL PROCEDURES

In the event of a sudden or non-sudden release of lead dust into the atmosphere; local EPA officials will be notified for appropriate corrective action. Spills shall be cleaned up by vacuuming or shoveling. All personnel in the area of a spill shall wear necessary protective clothing and respirators. All those not involved in spill containment shall be evacuated when necessary.

4e. PREVENTION OF RECURRENCE OR SPREAD OF FIRES, EXPLOSIONS, OR RELEASES

The nature of the waste flue dust material (K069) and batteries plates is such that the ignition points are extremely high. In order for the material to burn, it has to be introduced to a very high degree of heat. The lead based material are not of an explosive nature.

4f. STORAGE AND TREATMENT OF RELEASED MATERIAL

All released material from material handling shall be recycled into the rotary furnace for refinement.

4g. INCOMPATIBLE WASTE - N/A

4h. POST EMERGENCY EQUIPMENT MAINTENANCE

The post emergency equipment consists of a front end loader for controlling spills of lead dust (K069). There is a back-up loader which may be used if there is mechanical failure of the primary loader. Both "front-end" loaders follow a preventative maintenance plan on a daily basis (see inspection schedule). Fluid levels, proper operation, and engine condition are checked every day.

4i. CONTAINER SPILLS AND LEAKAGE

Containers of K069 and battery plates are located on bermed concrete pads. This containment prevents the release of spilled acid. Rainwater runoff is collected in the "collection sump".

The contingency plan, associated with the container storage areas is designed to minimize hazards to human health or the environment. Routine inspection of the container system will eliminate possible failure in construction design of the containment system. Inspection will be conducted for all containers. The concrete walls and base will be inspected for deficiencies in the containment of the spilled materials.

Whenever a positive indication of failure of the containment system exists, (i.e., a hole, crack, or separation). The owner shall stop and contain any leakage which has or is occuring. Corrective action to repair the failure shall take place immediately. If the waste leakage cannot be stopped by other means, the waste shall be removed from the base.

If the container has been removed from service, it will be restored only if:

1. The containment system has been repaired; and
2. The containment system has been certified by a qualified engineer as meeting the design specifications approved in the permit.

5. EVACUATION PLAN

In the event of an emergency, the emergency coordinator or safety director or training director or his designee will coordinate appropriate procedures.

Procedure:

1. The emergency coordinator will notify supervisors and area monitors if an evacuation may be necessary via the public address system.

2. When an evacuation is announced, stop work. The area monitors will direct employees in their areas to the closest exit.

3. All employees must leave the facility and report to the designated assembly area. Do not run. Do not linger in entrance ways or driveways, stay together in your assigned safe area.

4. Each employee must report to his/her area monitor once outside the building and danger area.

5. The emergency coordinator will notify the area monitors when it is safe to re-enter the facility.

6. Stay outside the facility until notified by the area monitors to re-enter.

Evacuation Routes, Exit Assignments

1. The attached plant diagram of Master Metals shows each section of the facility and the best route for each section to use when evacuating the building and plant area. Fire extinquishers are also noted on the diagram.

2. The designated assembly area for each section of the facility are shown in the plant diagrams.

Emergency Precautions:

1. Keep calm, think, avoid panic and confusion.

2. Know all exit locations; be sure you know the safest and quickest way out of the building.

3. Do not lock office or building doors when vacating the facility. The emergency coordinator and emergency support personnel must have visual access to all areas to ensure that the facility is clear of personnel.

4. Do not delay evacuation of the facility for any reason.

5. Do not assist in fire control unless properly trained and qualified.

6. When evacuating the facility, WALK to the nearest safe exit. Report to the safe areas away from the buildings and wait for instructions.

7. Keep out of the way, stay clear of the facility, and DO NOT interfere with emergency operations.

8. DO NOT reenter the facility until instructed to do so.

EMERGENCY EQUIPMENT LIST

Fire Control Equipment:

10 - 18 lb ABC Dry Chemical Fire Extinguishers

01 - 05 lb ABC Dry Chemical Fire Extinguishers

08 - 10 lb ABC Dry Chemical Fire Extinguishers

Safety Equipment:

300 - 3M Dust/Fume Respirator Masks #9920

1 - First Aid Kit

Clean-up Equipment:

1 - Tenant Industrial Sweeper Model 92

1 - John Deere Back Hoe

5 - Front End Pay Loaders

8 - Fork/Lift Trucks

1 - Barrel Grabber

8) Operating Log: The Operating Record has been implemented by the Environmental Clerk. The information regarding shipments of hazardous wastes is logged on a daily basis. This record has been implemented and updated for the entire 1987 calendar year. A page from this Record is included for your review.

DATE	GENERATOR COMPANY NAME	MATERIAL DESCRIPTION	MANIFEST #	EPA HAZ WASTE #	SHIPMENT VOL/WT	PHYSICAL STATE	TREATMENT CODE	LOCATION OF MAT
3-08-87	Heekin Can Inc.	Lead Dross	0005	D008	330 Kg.	Solid	S01/T18	Drum Sto
3-10-87	Heekin Can Inc.	Lead Dross	6124-13	D008	1,390P	Solid	S01/T18	Drum Sto
3-10-87	Atlantic Battery	Lead dross & Battery Plates	0252014	D008	46,600P	Solid	S01/T18	Drum Sto
3-13-87	Lennox China	Dross	0201850	D008	40,630P	Solid	S01/T18	Drum St
3-17-87	EI Dupont de Nemours	Lead Flue Dust	0208757	K069	31,960P	Solid	S03/T18	Waste Pi
3-17-87	Atlantic Battery	Battery Plates, dross, and Mud	0252015	D008	41,100P	Solid	S01/T18	Drum St
3-20-87	America Can Packaging	Solder Dross	1490947	D008	6,831P	Solid	S01/T18	Drum St
3-23-87	Atlantic Battery	Mud, Oxide, Lead Dross & Battery Plates	0252016	D-008	40,000P	Solid	S01/T18	Drum St
3-25-87	Lenox China	Dross	0252334	D008	38,000P	Solid	S03/T18	Waste Pi
4-02-87	U. S. Can Co.	Solder Dross	00001	D008	13,044P	Solid	S01/T18	Drum Sto
4-03-87	Keystone Resources	Lead Dross	2148753	D008	25068P	Solid	S01/T18	Drum Sto
4-15-87	Atlantic Battery	Lead dross, Mud, Battery Plates	0252017	D008	38000P	Solid	S01/T18	Drum Sto
4-15-87	EI Dupont de Nemours	Lead Flue Dust	0208764	K069	31,020P	Solid	S03/T18	Waste Pile
4-20-87	Atlantic Battery	Battery Plates, mud, dross	0252018	D008	37,000P	Solid	S01/T18	Drum Sto
4-22-87	EI Du Pont de Nemours	Lead Flue Dust	0208765	K069	30,900P	Solid	S03/T18	Waste Pi
4-22-87	Lenox China	Dross	0252337	D008	32,710P	Solid	S03/T18	Waste P
4-22-87	Lenox China	Dross	0252336	D008	40,220P	Solid	S03/T18	Waste P
5-01-87	Continental Can Co.	Solder dross	3847351	D008	12,065P	Solid	S01/T18	Drum Sto
5-06-87	Anzon Inc.	Dross Lead Compounds	4666944	D008	36,010P	Solid	S01/T18	Drum St
5-07-87	Anzon Inc.	Dross Lead Compounds	4666955	D008	43,060P	Solid	S01/T18	Drum St

9) Closure Plan: A Partial Closure Plan has been submitted to the USEPA - Region V office for the closure of all waste piles at the Master Metals facility. The closure plan is addressing the short-term requirement for the removal of waste piles and the implementation of secure container storage for all waste materials arriving at the facility. A copy of this closure plan is included.

After implementation of the secure container storage areas, a new Closure Plan will be written to include long-term closure of the facility.

Appendix A: Master Metals Site Map

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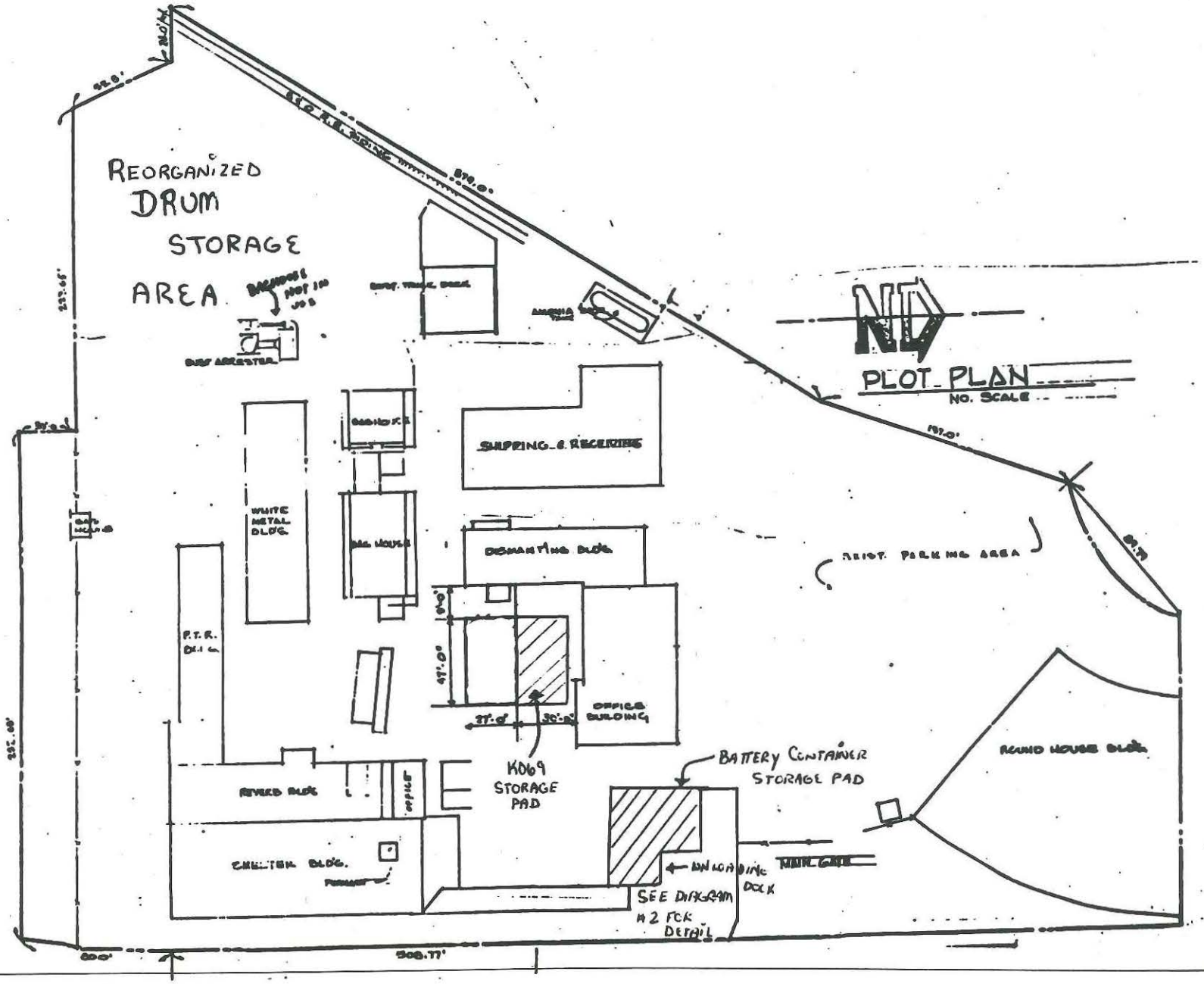
Phone (216) 526-0990



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Appendix B: Proposed Storage Pad Diagram

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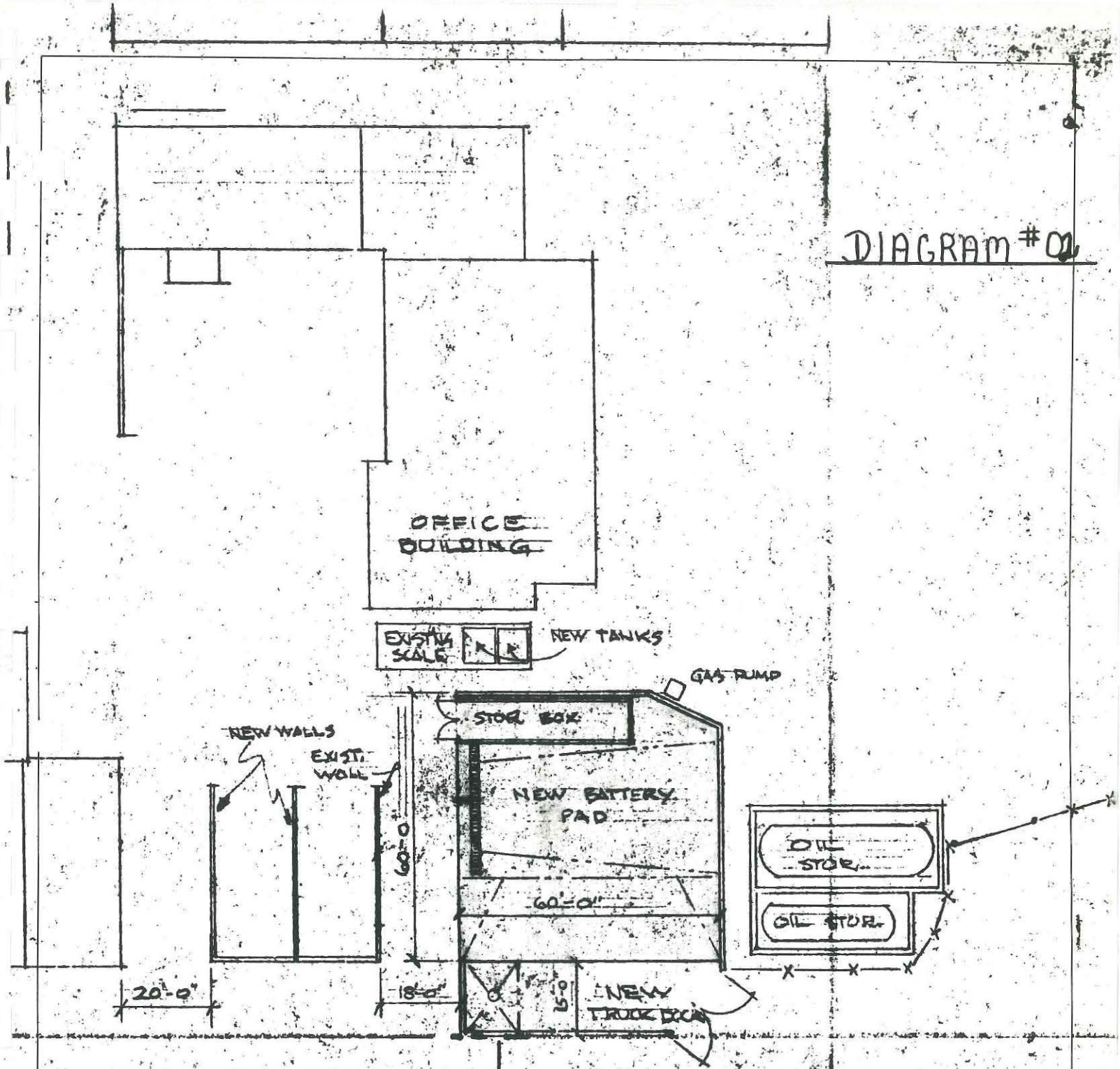
Phone (216) 526-0990

DIAGRAM #02



MASTER METALS
2850 WEST 3rd STREET
CLEVELAND OHIO

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

Appendix C: Storage Container Fabrication Quote

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

Proposal

FROM Henderson Fabricating
557 W. Glendale
Bedford Ohio 44146

Proposal No.

Sheet No.

Date

Proposal Submitted To	Work To Be Performed At
Name MASTER METALS INC.	Street Same
Street 2850 W. 3rd	City State
City Cleveland	Date of Plans
State Ohio	Architect
Telephone Number 621-2361	

We hereby propose to furnish all the materials and perform all the labor necessary for the completion of

Material Containers
1 Side walls & Bottom will be 1/4" mild steel
2 Bottom will be supported by 6" ship channel
3 Sides & Back will be supported by 6" C channel
4 length of Container will be ~~20'~~ - 0" 30' (Approved by Doug)
5 width will be 12'-0"
6 Height will be 7'-0"
7 Delivery will be: First Container 4 weeks and 1 Container per week after that.

All material is guaranteed to be as specified, and the above work to be performed in accordance with the drawings and specifications submitted for above work and completed in a substantial workmanlike manner for the sum of Dollars ($ 7,250.00 per).

with payments to be made as follows: Standard

Any alteration or deviation from above specifications involving extra costs, will be executed only upon written orders, and will become an extra charge over and above the estimate. All agreements contingent upon strikes, accidents or delays beyond our control. Owner to carry fire, tornado and other necessary insurance upon above work. Workmen's Compensation and Public Liability Insurance on above work to be taken out by Henderson Fab.

Respectfully submitted John P. Henderson Jr.

Per Doug Michy

Note — This proposal may be withdrawn by us if not accepted within 90 days

ACCEPTANCE OF PROPOSAL

The above prices, specifications and conditions are satisfactory and are hereby accepted. You are authorized to do the work as specified. Payment will be made as outlined above.

Accepted Signature

Date Signature

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
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The Ohio Legal Blank Co.
Publishers and Dealers Since 1883
Cleveland, Ohio 44113

Appendix D: Industrial Rotary Kiln Furnace P.O./Quote

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

(216) 621-2361

PURCHASE ORDER

No. 62487

MASTER METALS INC.

2850 W. THIRD ST. CLEVELAND, OHIO 44113

TO
G & W Industries, Inc.
1898 Carter Road
Cleveland, OH 44113

SHIP TO

DEPT.

DATE	F.O.B.	SHIP VIA	TERMS	TIME OF DELIVERY
6-24-87	G & W Shop	Truck	* see below	10 weeks A.R.O.

Please enter our order for the following items:

	QUANTITY	✓	DESCRIPTION	PRICE	UNIT
1	1 each		Rotary Furnace per your proposal &	$110450.00	
2			specifications of June 1, 1987		
3	*$27612.50		with Purchase Order		
4	$71792.50		upon Delivery		
5	$11045.00		Within 30 days of Delivery		
7			All workmanship and materials warrented for		
8			90 days from date of placing into service.		
9					

NOTE Purchase Order Number Must Appear on all Packages and Invoices!
Kindly acknowledge this order confirming PRICE, F.O.B. POINT and date when you anticipate shipping.
Original bill of lading must accompany all shipments.
If partial shipment of this order is made, notify us promptly when you will complete.

Purchasing Agent

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

G&W INDUSTRIES, INC.

SHIP REPAIRING • STEEL FABRICATORS • MACHINISTS

1898 CARTER ROAD • CLEVELAND, OHIO 44113

PHONE: 216/621-7246

June 1, 1987

Master Metals Inc.
2850 W. Third Street
Cleveland, Ohio 44113
Attn: Mr. Douglas Mickey, President

Gentlemen:

Following our recent conversations, we are pleased to submit out proposal for a Rotary Furnace. Our quotation consists of the following:

One: 12' diameter x 15' O.A. long Rotary Furnace fabricated from 5/8" 3/4" R.V. thick fire-box quality steel. Furnace is equipped with dished heads firing and loading openings. Furnace rides on two machined, heat treated trunnion rings mounted on 1/2" thick wrapper bands. drive is accomplished by means of a ring and pinion gear. (Motor and reduction unit by others).

4140 R.V.

One: Heavy duty frame to incorporate machined and hardened trunnion rolls with shafts and 5-7/16" diameter bearings. Double thrust rollers are employed to train the drum travel. Frame includes drive package mounting provisions.

One: Burner Transition End

One: Track mounted Charging Door.

One: Reversing Motor Starter

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

Items to be furnished by Master Metals unless specifically quoted by G & W are:

1. Incoming electrical power
2. Concrete foundations as directed by G & W
3. Loading and transportation cost to job site
4. Combustion equipment and refractory

Total Price.....$110,450.00

Terms: 25% with order
Balance when ready to ship

Freight: F.O.B. G & W Shop
Delivery: 10 weeks A.R.O.

We certainly appreciate the opportunity to propose this equipment and look forward to working with you in the endeavor.

Very truly yous,

Richard J. Vilcheck

Richard J. Vilcheck
President

RJV/sg

Envisage
Environmental
Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

Appendix E: Financial Projections

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

MASTER METALS, INC.
PROFORMA OPERATIONS & CASH FLOW FORECAST (1)(2)
(UNAUDITED)

	1987					1988							
	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	TOTAL
SALES (3)	$420,000	$430,000	$430,000	$410,000	$340,000	$353,000	$341,000	$423,000	$379,000	$433,000	$441,660	$450,493	$4,851,153
COST OF MATERIAL (3)	167,434	171,420	171,420	163,447	135,542	159,000	120,000	176,000	160,000	$154,000	$157,000	$160,000	$1,895,264
GROSS MARGIN	252,566	258,580	258,580	246,553	204,458	194,000	221,000	247,000	219,000	279,000	284,660	290,493	2,955,889
OPERATING EXPENSES (3)	213,000	213,000	220,000	213,000	210,000	213,000	187,000	210,000	220,000	235,000	275,000	270,000	$2,679,000
OPERATING PROFIT	39,566	45,580	38,580	33,553	(5,542)	(19,000)	34,000	37,000	(1,000)	44,000	9,660	20,493	$276,889
INTEREST EXP	2,000	2,000	2,000	2,000	3,000	3,000	3,000	2,500	2,500	2,200	2,200	2,200	$28,600
EARNINGS BEFORE INCOME TAXES	37,566	43,580	36,580	31,553	(8,542)	(22,000)	31,000	34,500	(3,500)	41,800	7,460	18,293	$248,289
INCOME TAXES	0	0	0	0	0	0	0	0	0	0	0	0	$0
NET EARNINGS	37,566	43,580	36,580	31,553	(8,542)	(22,000)	31,000	34,500	(3,500)	41,800	7,460	18,293	$248,289
CASH INCREASES:													
DEPERATION	8,333	8,333	8,333	8,333	8,333	8,333	8,333	8,333	8,333	8,333	8,333	8,333	$100,000
BANK LOAN (10)			10,000		100,000			(50,000)		(30,000)	(10,000)		$20,000
CASH DECREASES:													
TAX CLAIMS (4)	0	(1,053)	(1,053)	(1,053)	(1,053)	(1,053)	(1,053)	(1,053)	(1,053)	(1,053)	(1,053)	(1,053)	($11,583)
REDUCE ACCTS PAYABLE (5)	(10,417)	(10,417)	(10,417)	(10,417)	(10,417)	(10,417)	(10,417)	(10,417)	(10,417)	(10,417)	(10,417)	(10,417)	($125,000)
POST SECURED CLAIMS (7)	0	0	0	0	0	0	0	0	0	0	0	0	$0
NOTES PAYABLE-N/L (6)	0	(1,917)	(1,917)	(1,917)	(1,917)	(1,917)	(1,917)	(1,917)	(1,917)	(1,917)	(1,917)	(1,917)	($21,083)
CAPITAL EXP. (9)	(8,000)	(118,000)	(60,000)	(30,000)	(60,000)	0	0	0	0	0	0	0	($276,000)
CASH BEGINNING	80,000	107,483	28,009	9,536	6,036	32,441	5,388	31,335	10,782	2,229	8,976	1,383	$80,000
CASH ENDING	$107,483	$28,009	$9,536	$6,036	$32,441	$5,388	$31,335	$10,782	$2,229	$8,976	$1,383	$14,623	$14,623

ASSUMPTIONS:

(1) ASSUMES THE PLAN IS SUBSTATUALLY CONSUMMATION AS OF SEPTEMBER 1,1987.
(2) ASSUMES PAYMENT OF CLASS 10 ALLOWED CLAIMS PURSUANT TO TERMS OF THE PLAN.
(3) SALES, COST OF SALES, AND OPERATING EXPENSES ARE BASED UPON MANAGEMENTS CURRENT OPERATING ASSUMPTIONS
(4) TAX CLAIMS WILL BE PAID OVER A SIX YEAR PERIOD.
(5) ASSUMES ACCOUNTS PAYABLE WILL BE BROUGHT DOWN TO 45 DAYS OUTSTADING AND OTHERWISE CURRENT.
(6) ASSUMES THE CLASS SIX N.L. CLAIM WILL BE PAID IN ACCORDANCE WITH PLAN OF REORGANIZATION
(7) ASSUMES POST-PETITION SECURED CLAIMS (SECTION 364 CLAIM) WILL BE PAID OVER 3 YEARS COMMENCING IN 1988
(8) INCLUDES INTEREST ON S/H LOAN ($65,000), NOTE PAYABLE N.L. ($150,000), TAX CLAIMS
(9) ASSUMES INSTALLATION OF A $200,000, ROTARY FURANCE ; CONSTRUCTION OF EIGHT NEW STORAGE BINS ($60,000); CONSTRUCT CONCRETE PAD FOR BATTERY BREAKING ($25,000); YARD CLEAN UP AT $2,000 FOR EIGHT WEEKS.
(10) ASSUMES BANK LOAN OF $100,000 UPON CONFIRMATION OF PLAN.

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10) Financial Assurance: Master Metals has opened a Trust Fund Account overseen by the USEPA. This account is conditional upon a minimum monthly deposit which will be utilized to finance the implementation of the enclosed Partial Closure Plan procedures

11) Closure Cost Estimate: The Partial Closure Plan includes all costs required to close the waste piles and implement secure container storage. Once the Partial Closure procedures are complete, the long-term closure plan will be drafted.

12) Drum Condition: The drum storage area has been reorganized. At the time of inspection, over 90% of the "old" drum inventory had been processed or reorganized into neatly placed aisles. The remaining drums in the old storage area, which were present during your inspection, have been processed or reorganized.

Drum Storage Area

Overview: After August 01, 1987, all hazardous materials arriving at Master Metals will remain in their shipping containers. The majority of these arriving containers are 55-gallon drums. Upon arrival, the drums of hazardous materials are sampled and labelled in accordance to the Waste Analysis Plan. After acceptance, the drums are placed in the recently reorganized "Drum Storage Area".

In the Drum Storage Area, the drums are organized in accessible rows. Each drum is labelled with an Internal Receiving #, which refers to a specific shipment and/or customer.

The Drum Staorage Area reorganization was achieved by removing excess empty and full drum inventories and clearing non-hazardous rubbish/scrap.

The drums containing hazardous material, specifically lead dross(D008), were processed and reclaimed on-site in the Rotary Kiln Furnace.

In addition, there existed non-hazardous inventory that had accumulated and was removed during cleanup. This rubbish included empty drums, scrap steel, broken processing equipment, and wood pallets. These materials were containerized into a portable dumpster box, so that this non-hazardous rubbish could be transported by BFI Industries to an approved municipal landfill site. The scrap metals were transported to a scrap recycling facility.

Compliance Schedule: This work was performed during the period of July 01, 1987 - October 01, 1987 (ie: 12 weeks).

Week 01-02: Hired contractor and crew to perform rubbish removal. Obtained dumpsters for hauling non-hazardous rubbish.

Week 02-05: Removed excess trash and rubbish along the northern and western perimeters of existing parking area. Rubbish and trash also removed along the Western perimeter up to the security fence.

Week 04-09: This period focused on removal of non-hazardous trash, rubbish and scrap metals from the southwest portion of the facility. Also, reclaimable inventory, such as lead dross, was either directly processed or placed in existing waste piles located near the furnaces. The lead dross material was only placed in the existing waste pile if the container was insufficient to prevent rainwater contact, wind dispersal or spillage. The waste pile was equipped with plastic protective tarps, as described in the Partial Closure Plan Section.

Week 10-12: The secure drums of lead dross located throughout the facility were transferred to the drum area. These storage drums were placed in evenly spaced rows with enough room for access.

The aisles will provide easy access to the material so that it may be identified and transferred to the furnace.

Since these drum storage rows are organized, containerized materials arriving at the Master Metals facility remain in the shipment drums for storage in this area.

The reorganization of the drum storage area will:

- provide organized drum storage & efficient drum handling.
- reduce present waste pile inventories by requiring that arriving drummed material be placed in the Drum Storage Area, not in an existing waste pile.
- increase access to drum containers, therefore improving handling and process efficiency of drummed material.
- improve access throughout the entire facility by removing drums from aisles/roadways.

During your inspection, this process was approximately 95% completed.

13) <u>Inspections</u>: Refer to Response #5, which describes the Inspection documentation on the Weekly and Daily Inspection Forms

14) Wind Dispersal: Tarping material has been received and has been utilized to cover the Emission Control Dust(K069) and Lead Dross(D008) waste piles.

15) Run-on and Run-off Control: The waste piles are protected by use of the tarps and the concrete base. The main point to be made here is that secure container storage areas have been proposed to the USEPA. This container storage will be utilized for all materials arriving at the facility, including hazardous waste materials now located in waste piles.

The result of implementation of these storage controls is the permanent closure of all waste piles, as described in the Partial Closure Plan.

A description of the proposed storage areas is enclosed for your review.

CONTAINER STORAGE PLAN

The goal of this Plan is to reorganize the hazardous materials into secure container storage. Providing secure container storage for the battery plates and K069 emission control dust is of primary importance.

Container Storage Reorganization:

As described in the Partial Closure Plan, the waste piles containing battery plates and K069 emission control dust will be removed and secure storage containers implemented, thereby requiring that all arriving materials are stored on-site in bulk containers or drums.

Industrial Batteries: In order to comply with the Storage Requirements contained in 40CFR Part 266 Subpart G, Master Metals will construct a secure container storage pad for the battery dismantling operation. This concrete storage area will also be utilized for container storage of battery plates.

The container storage area will consist of a "battery receiving area", along with a secure storage area. Arriving shipments of industrial batteries will be unloaded at the battery receiving dock. After arrival, the batteries will be dismantled, therefore separating the lead battery plates from the battery casings. Any residual acid contained in the battery is collected in the "sump" located within the storage pad. The dismantled battery plates and casings will be transferred into an appropriate storage container.

The construction of a battery storage area will:

- eliminate the present battery waste pile inventory.
- provide organized and secure battery plate storage.
- improve battery handling procedures during unloading.
- prevent acid spills from leaving the storage pad by constructing a series of trenches which direct the spills and/or rainwater to two stainless steel collection tanks.

Emission Control Dust(K069): At the present time, the K069 emission control dust waste pile is located south of the main office building.

The present K069 waste pile is situated upon a concrete pad. Once modified by adding spill control berms, this pad will serve as secure storage area for the K069 containers. This container storage pad does not have to contain battery plates or potential acid spills, therefore this modification will be appropriate.

The modification of the of a K069 storage area will:

- eliminate the present K069 emission control dust waste pile inventory.
- provide organized and secure K069 storage.
- improve emission control dust handling procedures.

Misc: Waste Analysis Plan

A revised Waste Analysis Plan is enclosed. It describes the procedures used by the Receiving and Laboratory personnel when a shipment of hazardous materials arrives at the facility.

Also enclosed is the Waste Profile Survey. This form has been sent to present generators of hazardous materials arriving at the facility. New customers will be required to complete this form prior to the first shipment to the Master Metals facility.

WASTE ANALYSIS PROGRAM

Each hazardous waste material sent to the Master Metals facility must receive approval prior to the first shipment. The generator is required to complete and submit the "Waste Profile Form".

The information contained on this form is important for the identification and verification of waste materials arriving at the facility. The information contain on this form includes:

* General Information: Information about generator, including facility/mailing addresses and EPA ID #.

* Waste Stream Information: Information about the process generating the waste, generation rate and regulatory status.

* Shipping Information: The DOT classification on the manifest will assist in verifying the shipment material type. Other information includes container type, shipping frequency, and special handling.

* Physical Characteristics: Physical characteristics, such as color, odor, physical state, weight and pH of a 10% solution are parameters that can be verified upon arrival of the shipment.

* Waste Composition: This analysis, as provided by the generator, will assist Master Metals personnel with evaluating the material for reclamation at the facility.

* Chemical Analysis: The direct analysis of metal content of the waste material is important for the verification of waste composition of the waste received from each hazardous waste generator. Also, the EP Toxicity results will provide verification of the regulatory status of the material as a characteristic hazardous waste (for metals).

The Physical Characteristics, Waste Composition and Chemical Analysis categories are important aspects of verifying the consistency of waste materials arriving from each individual generator. A new analysis will be performed by the generator if the waste material changes for any reason.

WASTE SURVEY FORM

This Waste Survey Form is required to be completed by Generators of waste materials transported to Master Metals for reclamation.

GENERAL INFORMATION:

Customer Name:_____ EPA ID #:_____

Contact Person:_____ Telephone #:_____

Facility Address:_____ Mailing Address:_____

_____ _____

WASTE STREAM INFORMATION:

Common Name of Waste:_____

Process Generating Waste:_____

Is material a RCRA Hazardous Waste per 40CFR Part 261? Yes No

If YES.....EPA Hazardous Waste Code(s):_____
State Codes(if applicable):_____

Explain:_____

Is this waste "a material that is not one of the primary products of a production process and is not solely or separately produced by the production process", as defined in 40CFR Part 261.1(c)(3) as a "by-product"? .....Yes No

Is the waste "a material that has been used and as a result of contamination can no longer serve the purpose for which it was produced without further processing", as defined in 40CFR Part 261.1(c)(1) as a "spent material"? ....Yes No

Amt Generated:_____ Tons / Cu yds / drum PER week / month / quarter

Will the waste material be consistant throughout the year?...Yes No

SHIPPING INFORMATION:

Is waste a DOT Hazardous Material? Yes No

Proper Shipping Name:_____ RQ:_____

Hazard Class:_____ UN/NA #:_____

Shipping Method: Bulk____ Drums____ Type/Size:_____

Frequency: one-time / daily / weekly / monthly / quarterly / yearly

Special Handling Information:_____

WASTE SURVEY FORM(continued)

PHYSICAL CHARACTERISTICS OF WASTE:

Color:_____ Odor: none mild strong Describe:_____

Physical State: ___solid ___sludge ___powder ___liquid

Layers: ___multilayered ___bilayered ___homogeneous

pH Value: direct measurement_____ of 10% solution_____

Weight of Material: _____ pounds / tons PER cu ft / cu yd

Does material react(ie: temp increase, gas release, explosion) when contact with water occurs? _____

WASTE COMPOSITION:

_____	_____%
_____	_____%
_____	_____%
_____	_____%
_____	_____%
_____	_____%
Total	100 %

CHEMICAL ANALYSIS:

Metals:(include units)	Direct Analysis	EP Toxicity___
Arsenic (As)	_____	_____
Barium (Ba)	_____	_____
Cadmium (Cd)	_____	_____
Chromium(Cr)	_____	_____
Mercury (Hg)	_____	_____
Lead (Pb)	_____	_____
Selenium(Se)	_____	_____
Silver (Ag)	_____	_____
Antimony(Sb)	_____	
Bismuth (Bi)	_____	
Copper (Cu)	_____	
Nickel (Ni)	_____	
Tin (Sn)	_____	
Zinc (Zn)	_____	
Other_____	_____	

Is the above information based upon laboratory analysis of a sample of the waste stream? Yes No If yes, provide analysis date_____

CERTIFICATION:

I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS DOCUMENT AND ALL ATTACHED DOCUMENTS IS COMPLETE, ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.

_____	_____	_____
Authorized Signature	Title	Date

The following procedure will be followed upon arrival of hazardous waste shipments at the Master Metals facility:

1) A representative sample of all arriving shipments of manifested hazardous waste is obtained by laboratory personnel.

   The sample is labelled with the information which will identify the shipment, such as; Date, Generator Name, Manifest Number and Receiving Number. The representative samples are saved for 1 year.

2) The arriving shipment is assigned an internal "Receiving Number".

   The Receiving Number is an internal numbering system unique to each shipment arriving at the facility. Each arriving container in the shipment is labelled with this Receiving Number, therefore providing internal identification of each container. The Receiving Number is also recorded on the shipping paperwork/manifest, Laboratory Analysis Records and the Operating Record.

3) The quantity of material in each shipment is verified, as stated on the Uniform Hazardous Waste Manifest.

   This verification is accomplished by obtaining either; the exact drum count, or the shipment weights(full and empty) in order to calculate the exact amount of material arriving in bulk shipments.

4) The arriving material is inspected by the laboratory personnel.

   Inspection of the arriving hazardous waste material includes the physical inspection, such as color, odor, physical state and pH of a 10% solution. The results of this inspection can be compared with the Waste Survey Form and past shipment history, in order to verify the consistency of shipment material.

   If necessary, arriving shipments of hazardous waste material are analyzed for Lead, Antimony, Copper, Tin, Nickel and Zinc contents. These are the most important parameters when evaluating waste materials for reclamation and verifying the type and consistency of waste materials received from generators. The results will be recorded on the "Arriving Shipment Analysis Form", and compared to the information on the Waste Survey Form.

   If arriving waste materials; do not conform to the generator analysis, appear to be "different" from typical wastes, or are not acceptable for reclamation at the facility, the generator is notified in order to clarify the situation and determine the status of the future shipments.

   Any discrepancy in material composition, shipment weight or drum count is noted in the discrepancy space on Waste Manifest.

5) The Uniform Hazardous Waste Manifest is signed only by personnel trained in the Manifesting Procedures and the significance of all required information.

MASTER METALS, INC., 2850 W. THIRD ST., CLEVELAND, OHIO 44113 • (216) 621-2361

Lead Smelter and Refiner

October 20, 1987

Mr. Mark Bergman
Div of Solid & Hazardous Waste Mgt
Ohio Environmental Protection Agency
2110 East Aurora Road
Twinsburg, Ohio 44087

Mr. Bergman,

Master Metals has enclosed a response to the issues raised during your September 01, 1987 inspection of our facility.

Each concern is addressed numerically in the order received in your letter. Appropriate documentation is included.

If you have any questions regarding this response, please feel free to call us. We are available to meet with you at any time to discuss this proposal.

Respectfully Submitted,

Douglas K. Mickey
President

Encl: Master Metals Response Report

cc: Mr. Dale Helmers, USEPA - Region V
Mr. David K. Munson, Envisage Environmental

Stage 05: Fabricate storage containers and transfer batteries-battery plates and K069 baghouse dust into containers.

Overview: Master Metals will implement "storage controls" for the Lead batteries, which will conform to 40 CFR Part 266.80 - Spent Lead-Acid Batteries Being Reclaimed. As part of these requirements, container storage must be obtained for this material.

At this time, air emission control dust(K069) is generated at and delivered to Master Metals for reclamation. This industrial waste by-product is stored in on-site waste piles prior to the reclamation operation. The lead content contained in the emission control dust is reclaimed at Master Metals by utilizing the industrial rotary kiln furnace.

The battery plate containers will be situated on the secured concrete pad, as described in Stage 03. The K069 containers will be located on the "modified" concrete pad, as described in Stage 04. All containers will be tarped to prevent the entry of rainwater into the storage container.

The estimated requirement for containers is as follows:

-K069 Emission Control Dust..... 2 containers @ 90 cu yds each

These containers will store the emission control dust generated on-site in the Rotary Kiln Furnace Baghouse System. The baghouse dust is collected quarterly, with the entire previous inventory being processed within 90 days.

-Battery Plates..... 2 containers @ 90 cu yds each

These containers will store the battery casings and plates prior to their processing in the industrial rotary furnace.

Compliance Schedule: The implementation of secure container storage for battery plates and K069 dust will **begin upon completion of Stage 2, along with approval from the appropriate authorities.** The implementation schedule will then proceed as follows:

Week 01: Order four 90 cubic yard containers to be fabricated.

Week 04: Take delivery of two containers to be utilized for the battery plate storage.

Week 07: The battery storage pad will be completed, as described in Stage 03. During this week, the battery waste pile will be transferred into the two containers.

Week 08: Take delivery of two additional storage containers. Transfer the K069 emission control dust into these storage containers. These containers will be placed on the, already completed, modified K069 concrete storage pad.

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Results: As a result of Stage 05, the following procedures can be implemented:

- battery plate "waste pile" inventory will be removed.
- battery plates will be in a secure storage container.
- emission control dust(K069) waste pile will be removed.
- emission control dust(K069) storage will be in a secure storage container.
- emission control dust generated on-site will be collected from the baghouse in portable containers and transferred to the larger storage containers.
- arriving shipments of K069 material will remain containerized.
- wind dispersion and rain runoff of these hazardous materials will be efficiently controlled by placing a tarp over each storage container.
- access throughout the entire facility will be improved by removing waste piles.

Closure Costs: The cost for implementing this phase of closure is based on the fabrication of the storage containers, along with the labor required to transfer the present waste pile inventory.

The copy of the quote for fabrication of the storage containers is contained in Appendix C of this Partial Closure Plan.

Container Fabrication: Four 90 cu yd containers

Containers x $ 7,250/container.....$ 29,000.

Labor to transfer inventory: 24 hrs @ $ 25/hr..$ 600.

BATTERY/K069 CONTAINER FABRICATION = $ 29,600

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PARTIAL CLOSURE COST: PHASE ONE SUMMARY

The following chart summarizes the cost of Phase One of the Partial Closure at the Master Metals facility:

Stage 01:	Reorganize drum storage area.....	$ 39,750
Stage 02:	Closure of proposed location for storage pad.....	$ 12,000
Stage 03:	Construct storage pad for bulk containers.....	$ 30,000
Stage 04:	Modify existing storage pad for K069 containers..	$ 3,000
Stage 05:	Fabricate storage containers and transfer battery/battery plates and K069 baghouse dust....	$ 29,600
	TOTAL PHASE ONE EXPENSES =	$ 114,350

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PHASE TWO: CLOSURE OF D008 BY-PRODUCT WASTE PILES

The ultimate goal of this phase of Partial Closure is to remove the waste piles containing "lead dross by-products" (ie:D008) materials.

This phase of partial closure will involve three stages as discussed in these sections:

Stage 01: Protect waste piles of lead dross/D008 wastes from wind dispersal and rainwater run-off.

Stage 02: Install additional Industrial Rotary Kiln Furnace.

Stage 03: Process lead dross/D008 inventory.

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Stage 01: **Protect remaining waste piles of lead dross/D008 wastes from wind dispersal and rainwater run-off.**

Overview: Due to the estimated processing schedule of the D008/lead dross material, these waste piles will remain on-site for a period of time. Therefore, they will be protected from rainwater runoff and wind dispersion by utilizing plastic tarps. These tarps will cover the entire waste pile and be secured by concrete blocks.

Compliance Schedule: The installation of covering for the remaining waste piles will **begin upon an approval of this closure document by the appropriate authorities.** The implementation schedule will then proceed as follows:

Week 01: Order four tarps which will have the capacity to cover 4,000 square feet each. Also, order 40 concrete blocks.

Week 03: Receive tarps and cover D008/dross waste piles.

Results: Covering the remaining waste piles will protect the material from creating rain runoff and wind dispersal.

Closure Costs: The cost of this phase is directly related to the cost of the materials.

Four tarps @ $ 1,000 each(estimated)	=	$ 4,000
Fifty concrete blocks @ $ 1.00 each	=	50
4 hours x two employees @ $25.00/hour	=	$ 200

TOTAL COST OF WASTE PILE PROTECTION = $ 4,250

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Stage 02: **Install additional Industrial Rotary Kiln Furnace**

Overview: An additional Rotary Kiln Furnace is required in order to efficiently process and reduce the on-site inventory of lead dross by-product material. This additional furnace has a 60% greater capacity than the present furnace, therefore a greater amount of the lead dross can be processed.

Compliance Schedule: This stage has already begun due to the necessity of obtaining this equipment. The schedule is as follows:

06-24-87: Purchase Order issued by Master Metals therefore confirming the equipment purchase. A copy of the P.O. is contained in Appendix D.

10-01-87: Arrival of furnace at Master Metals facility.

11-01-87: Installation completed and furnace operational.

Results: The installation of this Rotary Kiln Furnace will accelerate the reclamation of the lead dross waste piles.

Cost Estimate: The aquisition and istallation costs for this equipment are as follows:

Rotary Kiln Furnace, including delivery	=	$ 110,450
Concrete base installation	=	$ 15,000
Refractory brick lining installation	=	$ 30,000
Installation of piping, electrical, etc	=	$ 44,550
TOTAL COST FOR ADDITIONAL FURNACE	=	$ 200,000

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Stage 03: Process lead dross/D008 inventory.

Overview: The last stage of partial closure is the processing of the remaining waste piles consisting of lead dross, a D008-coded by-product material. The estimated inventory of this material contained in existing waste piles is 1,900 tons.

During the course of normal reclamation operations, material from these waste piles will be processed. Due to the variation of lead content in different types of dross, different amounts of this material will be added to the batch reclamation process.
The projections offered in this Partial Closure Plan are based on average material loadings into the Rotary Kiln Furnace.

Compliance Schedule: The processing schedule for this material will be based on the following assumptions:

- the additional Rotary Kiln Furnace is installed. The capacity of the existing furnace is not great enough to process this material in a relatively efficient time span.

- the estimated inventory of 1,900 tons is reasonably accurate. The waste piles were measured and material weights estimated, therefore providing a reasonable value.

- the amount of other materials arriving does not greatly increase. There is a specific amount of material that each furnace is able to process per month. The battery plates and K069 materials will have process priority due to the limited amount of containerized storage which must be available, and the need to "turn-over" this inventory.

The estimated amount of lead dross to be added to the furnace from the waste pile inventory is 105 tons per month. At this process rate, the required time for total removal of the lead dross waste piles is 18 months. This time span would begin after the first month of operation of the new Rotary Kiln Furnace. After the waste piles are removed, the area below the pile will be swept with the Tennant Industrial Sweeper.

Results: The result of this stage is the removal of all remaining waste piles from the Master Metals facility.

Closure Cost: The closure cost for this phase is related to the labor cost for the transfer of this material to the furnace. Also, the sweeping time is included.

Labor to transfer material to furnace:
One employee @ 200 hours(estimated) @ $25/hr = $ 5,000
Labor to sweep area below pile:
One employee @ 8 hours @ $ 25/hr = $ 200

COST OF PROCESSING LEAD DROSS WASTE PILES = $ 5,200

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PARTIAL CLOSURE COST: PHASE TWO SUMMARY

The cost of implementing Phase Two of the Partial Closure Plan at the Master Metals facility is summarized as follows:

Stage 01: Protect waste piles of lead dross/D008 wastes from wind dispersal and rainwater run-off.....$ 4,250

Stage 02: Install additional Industrial Rotary Kiln Furnace.$ 200,000

Stage 03: Process lead dross/D008 inventory.....$ 5,200

TOTAL PHASE TWO EXPENSES = $ 209,450

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PARTIAL FACILITY CLOSURE SUMMARY

In summary, "Partial Facility Closure" will be implemented as described in this plan. The ultimate goal is to remove the existing waste piles from the facility and implement secure, organized and controlled container storage.

Certain procedures described in Phases One and Two of this plan may be implemented during the same time period, while other procedures are contingent on the completion of a previous stage of action. These situations are detailed within this Closure document.

The total cost of partial closure is estimated to be $ 320,800. This estimate does not include the cost of retaining professional services, estimated to be $ 15,000.

The majority of this closure plan can be implemented within a reasonable period of time after plan approval is issued, and financial considerations are stabilized in a timely fashion.

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FINANCIAL ASSURANCES:

This section will describe the financial aspects of the partial facility closure and continued operation of the facility.

Liability Insurance: Master Metals maintains a liability policy insuring against fire and loss of buildings and equipment. The policy is for 1.3 million of coverage.

Non-Sudden Liability Insurance: Due to market conditions, it has been extremely difficult trying to locate a company which will write this type of policy. Master Metals will continue to work toward securing this type of policy.

Long-term Facility Closure: A "trust fund" will be set up to fund a "long-term" facility closure commitment. Once partial closure has been completed, a long-term Closure Plan will be forwarded with projected facility closure cost estimates. These cost estimates cannot be projected at this time with any reasonable degree of accuracy. Once submitted, the long-term Facility Closure Plan will be the basis for the financing of the closure trust fund.

Financing Partial Closure: The present "cash flow" projection table is contained in Appendix E of this document. The partial closure is to be financed through operating capital and a bank loan of $100,000.

The following eight assumptions are made in the Company Reorganization Plan, which are applicable to the Cash Flow Projection and this document:

1) The Reorganization Plan will be consumatted by 09-01-87.
2) Payment of Class 10 allowed claims will be paid pursuant to the terms of the Reorganization Plan.
3) Sales, cost of sales, and operating expenses are based upon managements current operating assumptions.
4) Tax claims will be paid over a six year period.
5) Accounts payable will be brought down to 45 days outstanding and otherwise current.
6) The Class six N.L. claim will be paid in accordance to Reorganization Plan.
7) Post-petition secured claims will be paid over three years commencing in 1988.
8) Forecast includes interest on; S/H loans($85,000), Note Payable N.L.($150,000), and Tax Claims.

The following page is a more detailed explanation of the financing of "EPA Expenditures", as stated in this document.

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Financial Analysis Regarding EPA Expenditures

Assumptions 1 - 8 are the same assumptions carried forward from our plan of reorganization. The projections were a carry forward from the first five months of operation of 1987. These projections differ from the ones already stated because these projections were based on operating months of 1986 and we have had a much better margin to work with this year.

Assumption 9 is relegated to the purchase and installation of a larger rotary furnace. This will result in clearing out the current piles of D008 because it is capable of 60% more volume. The $200,000 is broken down as follows:

$110,000	Furnace
$ 20,000	Drive
$ 15,000	Foundation
$ 25,000	Refractory
$ 30,000	Installation

The furnace arrival is due in September, hence the reason for the large dispersement. In order for funds to be available, a $100,00 bank loan will have to be obtained. We are assuming that our reorganization plan will be complete, so that financing arrangements will be possible. Our other cash is being generated internally or by officer loans. I may note that basically all accumulated profits have either been used for the reorganization plan or the EPA project. No officer loans or bonuses have been paid back or drawn out.

The expenditures through October are for four conatiners for the K069 and battery plates as well as continuation of yard clean up and furnace installation.

The expenditures for November are for two more containers and the payment of the debt for the battery breaking area.

The expenditures for December are for the remaining two containers, additional payments for the battery breaking area and furnace installation.

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The resultant legal, consulting and testing fees will be paid in January when more cash will be available.

This projection is for a basic plan and payments may differ from month to month but the end result will be approximately the same.

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PARTIAL FACILITY CLOSURE

PLAN OF ACTION

MASTER METALS, INC.

2850 WEST 3rd STREET

CLEVELAND, OHIO 44113

Envisage Environmental Incorporated

P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments. I believe the information contained in this document is accurate and the estimations in good faith.

I am aware that there are significant penalties for submitting false information.

Douglas Mickey, President
Master Metals, Inc.

DATE

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INTRODUCTION:

The goal of this "Partial Closure Plan" is to detail the phases required to remove and close all existing waste piles at the Master Metals facility.

PHASE ONE at the site will focus on the reorganization of the hazardous materials into secure container storage. Providing secure container storage for the battery plates and K069 emission control dust is of primary importance.

PHASE TWO of Partial Closure will concentrate on the reclamation and closure of the remaining waste piles containing lead dross and D008 by-products.

PRESENT INVENTORY:

The present inventory of hazardous materials consists of lead-acid batteries/plates, emission control dust(K069) and lead dross(D008).

The lead-acid batteries, emission control dust, and lead dross are presently stored in "waste piles". Also, lead dross is stored on-site in drum containers.

The estimated inventory of these materials, as of 07-29-87, are as follows:

Hazardous Material	Storage Method	Estimated Volume(cu yds)	Estimated Weight(tons)
Lead-acid batteries	One Waste Pile	200 cu yds	200 tons
Emission control dust	One Waste Pile	125 cu yds	150 tons
Lead dross	Five Waste Piles	1,500 cu yds	1,900 tons
Lead dross	Drums	650 cu yds	800 tons

The volume estimations above were obtained by measuring the average length, width and height of each waste pile. The estimated weight was obtained by weighing a representative sample of the material in the waste piles.

In addition to the above inventory of hazardous materials, there exists non-hazardous inventory, including empty drums, scrap steel, broken processing equipment, and wood pallets.

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PHASE ONE: CONTAINER STORAGE REORGANIZATION:

The ultimate goal of this phase of closure is to remove the waste piles containing battery plates and K069 emission control dust. Another goal of this phase is to reorganize drum storage, thereby requiring that all arriving materials are stored on-site in bulk containers or drums.

This phase of partial closure will involve many stages as discussed in these sections:

Stage 01: Reorganize drum storage area.

Stage 02: Closure of proposed location for battery storage pad.

Stage 03: Construct storage pad for battery plate containers.

Stage 04: Modify existing storage pad for K069 containers.

Stage 05: Fabricate storage containers and transfer batteries/battery plates and K069 baghouse dust.

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Stage 01: **Reorganize drum storage area.**

Overview: After August 01, 1987, all hazardous materials arriving at Master Metals will remain in their shipping containers. The majority of these arriving containers are 55-gallon drums. Upon arrival, the drums will be sampled and labelled in accordance to the Waste Analysis Plan. After acceptance of the material, the drums will be placed in the reorganized "Drum Storage Area".

In the Drum Storage Area, the drums will be organized in accessible rows. Each drum will be labelled with an Internal Reference #, which will refer to a specific shipment and/or customer.

The reorganization will be achieved by removing excess empty and full drum inventories and clearing non-hazardous rubbish/scrap.

The drums containing hazardous material, specifically lead dross(D008), are processed and reclaimed on-site in the Rotary Kiln Furnace.

In addition, there exists non-hazardous inventory that has accumulated and will be removed during cleanup. This rubbish includes empty drums, scrap steel, broken processing equipment, and wood pallets. These materials are containerized into a portable dumpster box, so that this non-hazardous rubbish can be transported by BFI Industries to an approved municipal landfill site. The scrap metals will be transported to a scrap recycling facility.

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Compliance Schedule: This work will be performed during the period of July 01, 1987 - October 01, 1987 (ie: 12 weeks).

Week 01-02: Hire contractor and crew to perform rubbish removal. Obtain dumpsters for hauling non-hazardous rubbish.

Week 02-05: Remove excess trash and rubbish along the northern and western perimeters of existing parking area. Rubbish and trash will be removed along the Western perimeter up the security fence.

Week 04-09: This period will focus on removal of non-hazardous trash, rubbish and scrap metals from the southwest portion of the facility. Also, reclaimable inventory, such as lead dross, will be either directly processed or placed in existing waste piles located near the furnaces. The lead dross material will only be placed in the existing waste pile if the present container is insufficient to prevent rainwater contact, wind dispersal or continued spillage. The waste pile will be equipped with plastic protective tarps, as described in another section.

Also, as the cleanup progresses, the accumulated ground dirt and dust will be collected by a Tennant Model 265 Industrial Sweeper.

Week 10-12: The secure drums of lead dross located throughout the facility will be transferred to the drum area. These storage drums will be placed in evenly spaced rows with enough room for access. Also, the aisles will provide easy access to the material so that it may identified and transferred to the furnace for processing.

Once these drum storage rows are organized, containerized materials arriving at the Master Metals facility will remain in the shipment drums for storage in this area.

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Results: The reorganization of the drum storage area will:

- -provide organized drum storage & efficient drum handling.
- -reduce present waste pile inventories by requiring that arriving drummed material be placed in the Drum Storage Area, not in an existing waste pile.
- -increase access to drum containers, therefore improving handling and process efficiency of drummed material.
- -improve access throughout the entire facility by removing drums from aisles/roadways.

Closure Cost: The reorganization of the Drum Storage Area is being performed, primarily, by an outside contractor. The following costs apply to this part of Closure:

Equipment:		
90 cu yd Dumpster Rental for 12 weeks @ $ 1,000/week	= $	12,000
(Rubbish Disposal included in above price)		
Tennant 265 Mobile Sweeper Rental @ $ 1,250/month	= $	3,750
Labor:		
Contractor Crew(3 men) for 12 weeks @ $ 1,000/week	= $	12,000
Employees @ 20 hours/week for 12 weeks @ trash cleanup	= $	6,000
Employees @ 20 hours/week for 12 weeks @ sweeping	= $	6,000
TOTAL COST OF DRUM STORAGE AREA REORGANIZATION	= $	39,750

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June 25, 1990

Ms. Sherry Bianchin
USEPA - Region V
RCRA Enforcement Branch
5HR-12
230 S. Dearborn Street
Chicago, Illinois 60604

Re: Master Metals, Cleveland, Ohio

Dear Ms. Bianchin:

Please find enclosed a copy of the OEPA response report submitted to Mr. Mark Bergman of OEPA, NEDO, on May 31, and June 25, 1990. This report was in response to the violations and recommendations that were generated as a result of the OEPA site inspection of March 26 & 27, 1990.

If you have any questions or comments, or require additional information, please contact either Mr. Mickey of Master Metals, or myself at 216-526-0990.

Respectfully,

ENVISAGE ENVIRONMENTAL INC.

Thomas J. Monito

Thomas J. Monito
Regulatory Compliance Manager

Encl. OEPA Inspection Response Report

cc. Doug Mickey, Master Metals Inc. (Letter Only)
Mark Bergman, OEPA, NEDO (Letter Only)

Stage 02: <u>Closure of proposed location for storage pad</u>.

<u>Overview</u>: The proposed battery and K069 container storage pad will be located east of the existing office building, as shown on Diagrams #01 & #02. This location was chosen due to the proximity to the industrial furnaces. Therefore, material handling will be reduced when transferring the materials to the furnaces for reclamation.

Soil testing will be performed by obtaining soil core borings at two locations within the proposed area of the new storage pad. Each soil boring will be to the depth of the ground water table.

Cross-sectional samples of the soil will be obtained at predetermined intervals along the soil core. These sample intervals are estimated to be every 0.5 foot for the first two feet, every 1 foot until five foot level and then every five feet until the groundwater table is reached.

Each soil sample will be taken in triplicate; one for laboratory analysis, one for soil identification; one for storage.

The soil samples will be analyzed for arsenic, barium, cadmium, chromium, lead, mercury, selenium, silver and corrosivity. The total metal content will be determined in order to obtain a direct measurement of the trace metal concentrations. Also, the samples will be analyzed for EP Toxicity as detailed in 40CFR Part 261, Appendix II.

Prior to the construction of the secure storage pad, the existing waste pile of lead dross must be removed from [illegible] particular location within the facility. Once the mater[illegible]ved or transferred within the facility, the existin[illegible]ll be swept and examined.

Need total metals

STORAGE Pad

<u>Closure Schedule</u>: This section addresses [illegible] area which has been proposed for the cons[illegible]r Storage Pad". Implementation will begi[illegible] Closure Plan by the appropriate authorities. [illegible]e as follows:

Week 01: Transfer existing lead dross waste pile(250 ton) to the lead dross waste pile located directly north of the Smelting Building.
Obtain quotations for the drilling of two soil cores.

Week 03: Utilize the industrial sweeper to vacuum the dust off the existing concrete surface. Inspect concrete. Drill soil cores and obtain soil samples as previously described. Deliver soil samples to lab.

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Week 06: Obtain results of soil analysis from laboratory.

Week 07: Determine if remedial actions are required based on laboratory analysis and site inspection. At this point, the following options may occur:

If remediation is NOT required at this specific location within the Master Metals facility, then Stages 03 & 04 of Phase One will begin.

If remediation is required, the extent will be determined prior to the start of remedial procedures. The remedial actions, if necessary, are estimated to take 4-8 weeks. The "contaminated" soils will be processed through the Industrial Rotary Kiln Furnace. This approach is viable based on the extremely high operating temperatures in an oxidizing atmosphere. The contaminated soil input will be controlled. The air emissions are controlled with the existing baghouse unit. The collected baghouse emission dust is reprocessed on-site. The furnace "slag" resulting from this process will be analyzed for EP Toxicity, as outlined in 40CFR Part 261, Appendix II.

Once remedial action is concluded at this specific location within the facility, the construction of the Battery Storage Pad will begin, as described in Stages 03 & 04 of Phase One.

Results: The closure of this specific location within the facility will enable Master Metals to construct a secure storage pad, which will be utilized for storage of arriving industrial batteries, dismantling the batteries and storing the battery casings/lead plates in storage containers. Closure of this area is proposed so that the new concrete pad can be poured in an "uncontaminated" area.

Closure Costs: The cost of the closure of this specific area of the facility is as follows:

Transfer of present waste pile:	
One employee for 40 hours @ $25/hour	= $ 1,000
Sweeping of existing concrete for 4 hours	= $ 100
Drilling of two soil borings (estimated)	= $ 4,000
Consultant obtaining triplicate core samples	= $ 400
Analysis of 10 samples max. @ $ 450 each	= $ 4,500
Transfer of contaminated soil to furnace:	
One employee for 40 hours @ $25/hour	= $ 1,000
Engineer Certification of Location closure	= $ 1,000
TOTAL COST OF STORAGE AREA INVESTIGATION	= $ 12,000

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Stage 03: Construct storage pad for battery/plate containers.

Overview:

In order to comply with the Storage Requirements contained in 40CFR Part 266 Subpart G, Master Metals will construct a secure container storage pad for the battery dismantling operation. This concrete storage area will also be utilized for container storage of battery plates.

The container storage area will consist of a "battery receiving area", along with a secure storage area, as shown on Diagrams #01 & #02. Arriving shipments of industrial batteries will be unloaded at the battery receiving dock. After arrival, the batteries will be dismantled, therefore separating the lead battery plates from the battery casings. Any residual acid contained in the battery is collected in the "sump" located within the storage pad. The dismantled battery plates and casings will be transferred into the appropriate storage container.

Compliance Schedule: The construction of the battery unloading dock and secure storage area will begin upon completion of Stage 2, along with approval from the appropriate authorities. The implementation schedule will then proceed as follows:

Week 01-02: Schedule contractor on-site to begin work.

Week 03-06: Construction of storage pad

Week 07: Transfer battery waste pile i

Results: The constructing of a battery storage

-eliminate the present battery waste pile

-provide organized and secure battery plate storage.

-improve battery handling procedures during unloading.

-prevent acid spills from leaving the storage pad by constructing a series of trenches which direct the spills and/or rainwater to two stainless steel collection tanks.

Closure Costs: The cost for implementing a secure storage area for industrial battery storage area has been quoted at $ 30,000. This price includes; all labor and materials for concrete pad, unloading dock, drain/trenches, berms and spill collection tanks.

TOTAL COST OF BATTERY STORAGE PAD = $ 30,000

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

Stage 04: **Modify existing storage pad for K069 containers.**

Overview: At the present time, the K069 emission control dust waste pile is located south of the main office building.

The present K069 waste pile is situated upon a concrete pad. Once modified by adding spill control berms, this pad will serve as secure storage area for the K069 containers. This container storage pad does not have to contain battery plates or potential acid spills, therefore a modification will be appropriate.

Although soil investigation below the existing concrete pad will not occur at this time, this type of investigation could occur in the future without disrupting the K069 container storage.

Compliance Schedule: The construction of the K069 modified K069 storage pad will **begin at the same time as Stage 3.** The implementation schedule will then proceed as follows:

Week 01-02: Obtain quote for adding berms to existing concrete pad.

Week 03-06: Existing K069 waste pile inventory to be processed and removed from this area.

Sweep and examine existing concrete

Schedule contractor on-site to cons

Monthly K069

Results: The modification of the of a K069 storage

-eliminate the present K069 emission contro pile inventory.

-provide organized and secure K069 storage.

-improve emission control dust handling procedures.

Closure Costs: The cost for adding berms to the existing implementing a secure storage area is estimated to be $ 3,000.

TOTAL COST OF BATTERY STORAGE PAD = $ 3,000

Envisage Environmental Incorporated
P.O. Box 152 Richfield, Ohio 44286
Phone (216) 526-0990

1 SEPT. 1987 9:00 A.M.
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB #

GENERAL INFORMATION

U.S. EPA I.D. # OHD-097-613-871

Facility: MASTER METALS Address: 2850 WEST THIRD ST. City: CLEVELAND
State: OHIO Zip Code: 44113 County: CUYAHOGA Telephone: (216) 621-2361

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	DOUG MICKEY	PRESIDENT	(216) 621-2361
2.	DAVID MUNSON (CONSULTANT)	REGULATORY COMPLIANCE MGR.	(216) 526-0990
3.			

INSPECTOR(S)

1.	MARK BERGMAN	OHIO EPA	(216) 425-9171
2.	THERESA SABOL	OHIO EPA	(216) 425-9171
3.			

INSTALLATION ACTIVITY

Mark One

- [ ] Generator only (G)
- [ ] Transporter (T)
- [ ] TSDF only
- [ ] G-T
- [x] G-TSDF
- [ ] T-TSDF
- [ ] G-T-TSDF

If the site is a TSDF, check the boxes indicating which areas were reviewed.

- [x] General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure
- [x] Containers S01
- [ ] Tanks S02/T01
- [ ] Surface Impoundments S04/T02
- [ ] Incineration/Thermal Treatment
- [x] Waste Piles S03
- [ ] Land Treatment D81
- [ ] Landfills D80
- [ ] Chemical/Physical/Biological T04
- [ ] Groundwater Monitoring
- [ ] Post-Closure

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RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
1. Has the facility submitted a Part A to Ohio?	X			
2. If "yes", is it complete and accurate?	X			
3. Has the facility submitted a Part B?	X			
4. Was advance notice of the inspection given? If so, how far in advance?	X			2 WEEKS

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

Secondary lead smelting facility: Reclaims lead with a rotary smelting furnace. Accept lead dross (D008), battery manufacturer scrap (EXEMPT RECLAMATION) and also process used industrial batteries. Also reclaim general lead scrap. Plan to accept off-site K069 when permit is obtained. Facility resubmitted Part B on March 14, 1986 and is awaiting comments from the U.S. EPA. On June 15, 1987, the U.S. EPA filed a lawsuit against Master Metals because they lost Interim Status and continued to operate. Master Metals currently has a plan submitted to the U.S. EPA addressing issues to bring facility into compliance.

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RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	X			
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	X			REPROCESSED K069
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]		X		
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].			X	DO NOT TRANSPORT OFF-SITE HAZARDOUS WASTES
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].			X	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].			X	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].			X	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]			X	

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]			X	
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].			X	
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].			X	
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]			X	
7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".			X	
b) The date that accumulation began is clearly marked on each container.			X	
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]		X		LAST TRAINING MAY OF 1986
9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].		X		ALL EMPLOYEES IN PROGRAM MUST HAVE SPECIFIC JOB TITLES AND DESCRIPTIONS

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

	Yes	No	N/A	Remark #
Subpart B: General Facility Standards				
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)]	X			
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. (Section 265.13(b)) [3745-65-13(B)]	X			
3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)]		X		
b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]	X			
IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -				
a) A 24-hour surveillance system, or		X		
b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]	X			
5. The facility has a sign,"Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]		X		ENTRANCE HAS SIGN OTHER FENCE AREAS NEEDED

	Yes	No	N/A	Remark #
6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15]		X		MUST HAVE A WRITTEN INSPECTION PLAN
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)]		X		MUST DOCUMENT INSPECTIONS
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-65-16(A)(B)(C)]		X		SEE PREVIOUS COMMENTS
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)]		X		SEE PREVIOUS COMMENTS
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]				
a) Protection from sources of ignition.			X	
b) Physical separation of incompatible waste materials.			X	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.			X	
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)]			X	

Subpart C: Preparedness and Prevention

	Yes	No	N/A	Remark #
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31]		X		
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]				
a) Internal alarm system.	X			
b) Access to telephone, radio or other device for summoning emergency assistance.	X			
c) Portable fire control equipment.	X			
d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers.	X			
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33]		X		MUST DOCUMENT TESTING AND MAINTENANCE
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]			X	
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35]	X			
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]	X			
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]			X	

RCRA INTERIM STATUS INSPECTION FORM

Subpart D: Contingency and Emergency

	Yes	No	N/A	Remark #
1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:				
a) Actions to be taken by personnel in the event of an emergency incident.	X			
b) Arrangements or agreements with local or state emergency authorities.		X		MUST DOCUMENT
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.		X		MUST HAVE ADDRESSES
d) A list of all emergency equipment including location, physical description and outline of capabilities.		X		NEED LIST OF EQUIPMENT
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)]			X	
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)]	X			
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54]	X			CURRENTLY REVISING CONTINGENCY PLAN
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55]	X			
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)			X	

RCRA INTERIM STATUS INSPECTION FORM

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	Yes	No	N/A	Remark #
1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:				HAVE A DRAFT LOG, HOWEVER, HAVE NOT IMPLEMENTED YET
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]		X		
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).		X		
c) The estimated (or actual) weight, volume or density of the waste material(s).		X		
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).		X		
e) The present physical location of each hazardous waste within the facility.		X		
f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)]			X	
g) Records of any waste analyses and trial tests required to be performed.	X			
h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).		X		HAVE NOT IMPLEMENTED
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]			X	
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.	X			

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	Yes	No	N/A	Remark #
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]	X			

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	Yes	No	N/A	Remark #
3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)	X			
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]			X	
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]			X	
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]			X	
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]			X	

RCRA INTERIM STATUS INSPECTION FORM

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

	Yes	No	N/A	Remark #
1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12]	X			
a) A description of how and when the facility will be closed. (265.112(a)(1)) [3745-66-12(A)(1)]	X			
b) A description of how any of the applicable closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	X			DOCUMENT ON WASTEPILES
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)		X		MUST UPDATE CLOSURE PLAN FOR ALL H.W.
d) A description of steps taken to decontaminate facility equipment.	X			
e) The year closure is expected to begin and a schedule for the various phases of closure.		X		MUST HAVE A SCHEDULE
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)]		X		MUST AMMEND TO CHANGES
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)]			X	

RCRA INTERIM STATUS INSPECTION FORM

Subpart H: Financial Requirements

	Yes	No	N/A	Remark #
1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]				CAN NOT ESTABLISH TRUST FUND
a) A closure trust fund, or		X		
b) A surety bond, or		X		
c) A closure letter of credit, or		X		
d) A combination of financial mechanisms.		X		
2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?		X		NOT ACCURRATE $21,000.00
3. When was the most recent estimate made?		X		MARCH 14, 1986
4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?			X	
5. When was the most recent estimate made?			X	

REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]	X			
b) In good physical condition (265.171) [3745-66-71]		X		SOME DRUMS IN POOR CONDITION
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	X			
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	X			
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	X			
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]		X		NEEDS TO BE DOCUMENTED
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]			X	
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]			X	

RCRA INTERIM STATUS INSPECTION FORM

Subpart L: Storage in Waste Piles

	Yes	No	N/A	Remark #
1. Waste materials which are subject to dispersal by wind have been adequately protected against such dispersal. (265.251) [3745-67-51]		X		NEED WIND PROTECTION
2. If leachate or runoff from a Waste Pile is a hazardous waste, then one or more of the following steps have been taken to prevent or properly manage the situation: (265.253) [N/A]				
a) The pile has been placed on an impermeable base, run-on has been diverted away from the pile and any leachate or runoff is collected and managed as a hazardous waste.		X		BATTERY ACID
b) The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff.		X		TO ADDRESS THIS PROBLEM IN FUTURE
3. No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record. (265.252) [3745-67-52]			X	
4. Ignitable or Reactive waste materials are not placed in Waste Piles unless one or both of the following conditions are met: (265.256) [3745-67-56]				
a) The addition to the pile results in a mixture which no longer meets the definition of Ignitable or Reactive under rules 3745-51-21 or 3745-51-23 and was done in compliance with the safety requirements of Section 265.17(b). [3745-65-17]			X	
b) The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction.			X	

	Yes	No	N/A	Remark #
5. Incompatible materials, ignitable and reactive wastes are placed in the waste pile only in accordance with the safety requirements of Section 265.17(b) [3745-65-17]. (265.256 and 265.257(a)) [3745-67-56 and 3745-67-57(A)]			X	
6. A waste stored in a pile and which is incompatible with materials stored nearby is separated or protected from them. (265.257(b)) [3745-67-57(B)]			X	

Subpart C: Preparedness and Prevention

	Yes	No	N/A	Remark #
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31]		X		
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]				
a) Internal alarm system.	X			
b) Access to telephone, radio or other device for summoning emergency assistance.	X			
c) Portable fire control equipment.	X			
d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers.	X			
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33]		X		MUST DOCUMENT TESTING AND MAINTENANCE
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]			X	
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35]	X			
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]	X			
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]			X	

RCRA INTERIM STATUS INSPECTION FORM

Subpart D: Contingency and Emergency

	Yes	No	N/A	Remark #
1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:				
a) Actions to be taken by personnel in the event of an emergency incident.	X			
b) Arrangements or agreements with local or state emergency authorities.		X		MUST DOCUMENT
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.		X		MUST HAVE ADDRESSES
d) A list of all emergency equipment including location, physical description and outline of capabilities.		X		NEED LIST OF EQUIPMENT
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)]			X	
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)]	X			
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54]	X			CURRENTLY REVISING CONTINGENCY PLAN
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55]	X			
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)			X	

RCRA INTERIM STATUS INSPECTION FORM

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	Yes	No	N/A	Remark #
1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:				HAVE A DRAFT LOG, HOWEVER, HAVE NOT IMPLEMENTED YET
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]		X		
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).		X		
c) The estimated (or actual) weight, volume or density of the waste material(s).		X		
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).		X		
e) The present physical location of each hazardous waste within the facility.		X		
f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)]			X	
g) Records of any waste analyses and trial tests required to be performed.	X			
h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).		X		HAVE NOT IMPLEMENTED
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]			X	
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.	X			

	Yes	No	N/A	Remark #
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]	X			

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)	X			
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]			X	
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]			X	
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]			X	
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]			X	

RCRA INTERIM STATUS INSPECTION FORM

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

	Yes	No	N/A	Remark #
1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12]	X			
a) A description of how and when the facility will be closed. (265.112(a)(1)) [3745-66-12(A)(1)]	X			
b) A description of how any of the applicable closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	X			DOCUMENT ON WASTEPILES
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)		X		MUST UPDATE CLOSURE PLAN FOR ALL H.W.
d) A description of steps taken to decontaminate facility equipment.	X			
e) The year closure is expected to begin and a schedule for the various phases of closure.		X		MUST HAVE A SCHEDULE
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)]		X		MUST AMMEND TO CHANGES
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)]			X	

RCRA INTERIM STATUS INSPECTION FORM

Subpart H: Financial Requirements

	Yes	No	N/A	Remark #
1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]				CAN NOT ESTABLISH TRUST FUND
a) A closure trust fund, or		X		
b) A surety bond, or		X		
c) A closure letter of credit, or		X		
d) A combination of financial mechanisms.		X		
2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?		X		NOT ACCURRATE $21,000.00
3. When was the most recent estimate made?		X		MARCH 14, 1986
4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?			X	
5. When was the most recent estimate made?			X	

REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]	X			
b) In good physical condition (265.171) [3745-66-71]		X		SOME DRUMS IN POOR CONDITION
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	X			"
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	X			
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	X			
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]		X		NEEDS TO BE DOCUMENTED
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]			X	
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]			X	

RCRA INTERIM STATUS INSPECTION FORM

Subpart L: Storage in Waste Piles

	Yes	No	N/A	Remark #
1. Waste materials which are subject to dispersal by wind have been adequately protected against such dispersal. (265.251) [3745-67-51]		X		NEED WIND PROTECTION
2. If leachate or runoff from a Waste Pile is a hazardous waste, then one or more of the following steps have been taken to prevent or properly manage the situation: (265.253) [N/A]				
a) The pile has been placed on an impermeable base, run-on has been diverted away from the pile and any leachate or runoff is collected and managed as a hazardous waste.		X		BATTERY ACID
b) The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff.		X		TO ADDRESS THIS PROBLEM IN FUTURE
3. No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record. (265.252) [3745-67-52]			X	
4. Ignitable or Reactive waste materials are not placed in Waste Piles unless one or both of the following conditions are met: (265.256) [3745-67-56]				
a) The addition to the pile results in a mixture which no longer meets the definition of Ignitable or Reactive under rules 3745-51-21 or 3745-51-23 and was done in compliance with the safety requirements of Section 265.17(b). [3745-65-17]			X	
b) The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction.			X	

	Yes	No	N/A	Remark #
5. Incompatible materials, ignitable and reactive wastes are placed in the waste pile only in accordance with the safety requirements of Section 265.17(b) [3745-65-17]. (265.256 and 265.257(a)) [3745-67-56 and 3745-67-57(A)]			X	
6. A waste stored in a pile and which is incompatible with materials stored nearby is separated or protected from them. (265.257(b)) [3745-67-57(B)]			X	

8/6/86 8:00 AM
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB #

GENERAL INFORMATION

U.S. EPA I.D. # OHD 097 613 871

Facility: Master Metals Inc. Address: 2850 West 3rd Street City: Cleveland

State: Ohio Zip Code: 44113 County: Cayahoga Telephone: (216) 621-2361

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	Doug Mickey	President	(216) 621-2361
2.			
3.			

INSPECTOR(S)

1.	Dale Helmers	Environmental Scientist	(312) 886-7566
2.			
3.			

INSTALLATION ACTIVITY

Mark One

- [ ] Generator only (G)
- [ ] Transporter (T)
- [ ] TSDF only
- [ ] G-T
- [x] G-TSDF
- [ ] T-TSDF
- [ ] G-T-TSDF

If the site is a TSDF, check the boxes indicating which areas were reviewed.

- [x] General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure
- [x] Containers S01
- [ ] Tanks S02/T01
- [ ] Surface Impoundments S04/T02
- [ ] Incineration/Thermal Treatment
- [x] Waste Piles S03
- [ ] Land Treatment D81
- [ ] Landfills D80
- [ ] Chemical/Physical/Biological T04
- [ ] Groundwater Monitoring
- [ ] Post-Closure

Revised 12/84

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
1. Has the facility submitted a Part A to Ohio?		X		
2. If "yes", is it complete and accurate?			X	
3. Has the facility submitted a Part B?	X			
4. Was advance notice of the inspection given? If so, how far in advance?		X		

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

see cover memo.

Revised 12/84

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

	Yes	No	N/A	Remark #
Subpart B: General Facility Standards				
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)]		X		1
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. (Section 265.13(b)) [3745-65-13(B)]		X		2
3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)]	X			
b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]	X			
IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -				
a) A 24-hour surveillance system, or	X			3
b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]	X			4
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]		X		none were observed.

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15]		X		5
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)]		X		5
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-65-16(A)(B)(C)]		X		No annual update also see 6
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)]		X		6
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]				
a) Protection from sources of ignition.			X	
b) Physical separation of incompatible waste materials.			X	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.			X	
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)]			X	

RCRA INTERIM STATUS INSPECTION FORM

Subpart C: Preparedness and Prevention

	Yes	No	N/A	Remark #
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31]		X		
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]				
a) Internal alarm system.	X			
b) Access to telephone, radio or other device for summoning emergency assistance.		X		
c) Portable fire control equipment.		X		
d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers.	X			
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33]	X			7
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]			X	
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35]	X			
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]	X			8
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]			X	

RCRA INTERIM STATUS INSPECTION FORM

Subpart D: Contingency and Emergency

	Yes	No	N/A	Remark #
1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:				
a) Actions to be taken by personnel in the event of an emergency incident.	X			
b) Arrangements or agreements with local or state emergency authorities.		X		
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.		X		no addresses
d) A list of all emergency equipment including location, physical description and outline of capabilities.		X		9
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)]	X			
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)]		X		only onsite
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54]	X			
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55]	X			
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)			X	

RCRA INTERIM STATUS INSPECTION FORM

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	Yes	No	N/A	Remark #
1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:				
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]		X		10
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).		X		10
c) The estimated (or actual) weight, volume or density of the waste material(s).		X		10
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).		X		10
e) The present physical location of each hazardous waste within the facility.		X		10
f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)]			X	
g) Records of any waste analyses and trial tests required to be performed.	X			
h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).		X		10
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]	X			
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.	X			in Part B

	Yes	No	N/A	Remark #
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]		X		

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	Yes	No	N/A	Remark #
3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)	X			
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]			X	
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]			X	
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]			X	
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]			X	

RCRA INTERIM STATUS INSPECTION FORM

Subpart G: Closure and Post-Closure

	Yes	No	N/A	Remark #
NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.				
1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12]				
a) A description of how and when the facility will be closed. (265.112(a)(1)) [3745-66-12(A)(1)]	X			
b) A description of how any of the applicable closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	X			
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)	X			
d) A description of steps taken to decontaminate facility equipment.		X		12
e) The year closure is expected to begin and a schedule for the various phases of closure.		X		13 ~~closure not planned~~
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)]			X	
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)]			X	

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]				14
b) In good physical condition (265.171) [3745-66-71]				"
c) Compatible with the wastes stored in them (265.172) [3745-66-72]				"
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]				"
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]				"
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]				"
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]				"
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]				"

RCRA INTERIM STATUS INSPECTION FORM

Subpart L: Storage in Waste Piles

	Yes	No	N/A	Remark #
1. Waste materials which are subject to dispersal by wind have been adequately protected against such dispersal. (265.251) [3745-67-51]		X		
2. If leachate or runoff from a Waste Pile is a hazardous waste, then one or more of the following steps have been taken to prevent or properly manage the situation: (265.253) [N/A]				
a) The pile has been placed on an impermeable base, run-on has been diverted away from the pile and any leachate or runoff is collected and managed as a hazardous waste.		X		No run-off collection or run-on diversion
b) The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff.		X		
3. No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record. (265.252) [3745-67-52]	X			
4. Ignitable or Reactive waste materials are not placed in Waste Piles unless one or both of the following conditions are met: (265.256) [3745-67-56]				
a) The addition to the pile results in a mixture which no longer meets the definition of Ignitable or Reactive under rules 3745-51-21 or 3745-51-23 and was done in compliance with the safety requirements of Section 265.17(b). [3745-65-17]			X	
b) The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction.			X	

	Yes	No	N/A	Remark #
5. Incompatible materials, ignitable and reactive wastes are placed in the waste pile only in accordance with the safety requirements of Section 265.17(b) [3745-65-17]. (265.256 and 265.257(a)) [3745-67-56 and 3745-67-57(A)]			X	
6. A waste stored in a pile and which is incompatible with materials stored nearby is separated or protected from them. (265.257(b)) [3745-67-57(B)]			X	

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	X			
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?		X		
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]		X		
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].			X	None shipped off-site
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].			X	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].			X	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].			X	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]			X	

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]			X	
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].			X	
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].			X	
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]			X	
7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".			X	
b) The date that accumulation began is clearly marked on each container.			X	
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]		X		
9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].		X		

RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

Comments

1. There was no analyses available for the K069 dust generated on-site.

2. The waste analysis plan only discussed piles of K069 waste. It does not discuss sampling of containers or waste which is hazardous solely because of its lead content.

3. A security guard checks the facility every 6 hours and employees work 24 hours a day.

4. Several holes were noted in the fence.

5. The only inspection plan available was in the Part B. It was not being followed. No inspections were being done.

6. Per Mr. Mickey, the training program in the Part B has been implemented. However, there are no training records available so it is difficult to determine if the training was adequate.

7. All fire extinguishers are inspected quarterly and after each use.

8. Copies of any arrangements couldn't be produced.

9. The only item listed was fire extinguishers. There were no descriptions or an outline of capabilities.

10. There was no operating record.

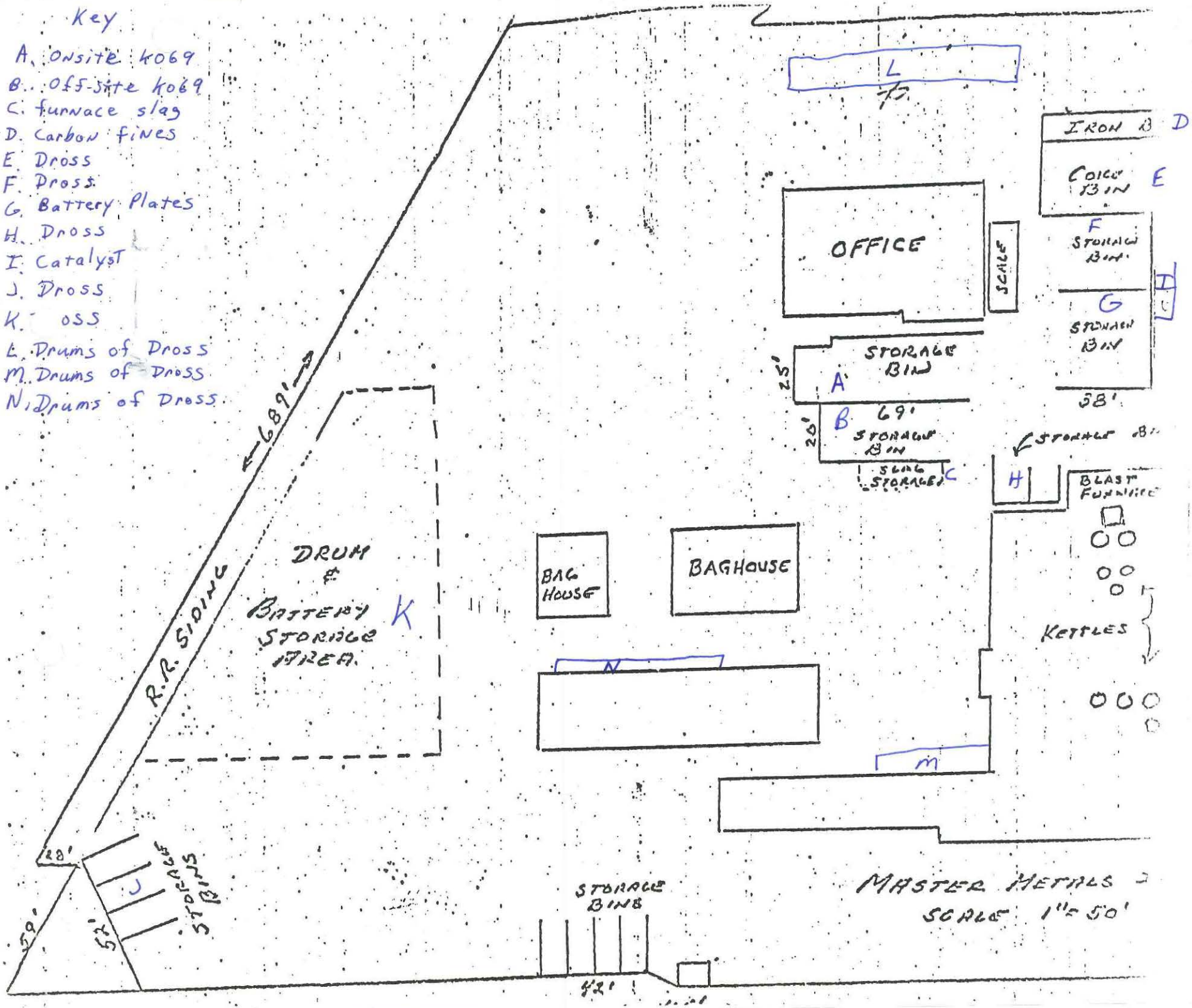
11. One manifest was not signed by Master Metals. However, the facility indicated that the generator has contacted them regarding the manifest and the generator had returned its copy to Master Metals for signature. All others were acceptable.

12. There was no discussion of sampling or testing to determine if all hazardous waste had been removed.

13. Since closure will occur based upon economic conditions, no estimated date was included. There was no schedule for individual steps of closure, only total time needed.

14. There were no containers of hazardous waste on-site at the time of the inspection.

V. FACILITY DRAWING (see page 4)



NJ 0208720 (REV. 3-84)

State of New Jersey
Department of Environmental Protection
Division of Waste Management
CN 028, Trenton, NJ 08625

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. NJD 0 9 4 5 5 7 8 1 0 — Manifest Document No.
2. Page 1 of 1
Information in the shaded areas is not required by Federal law *

3. Generator's Name and Mailing Address: EI Dupont de Nemours, Chambers Works, Deepwater, NJ 08023
A. State Manifest Document Number: NJA0208720
B. State Gen. ID: Same
4. Generator's Phone: (609) 540-2496
5. Transporter 1 Company Name: Lacy's Express — 6. US EPA ID Number: NJD 9 8 4 5 5 5 0 3 3
C. State Transporter 1 ID: NJDEP 3193 DEGAC# 6365
7. Transporter 2 Company Name — 8. US EPA ID Number
D. Transporter's Phone: 609-299-6569
9. Designated Facility Name and Site Address: Master Metals Inc, 2850 W. 3rd St, Cleveland, Ohio 44113 — 10. US EPA ID Number: OHD 9 9 7 1 4 1 3 8 7 1
E. State Transporter 2 ID
F. Transporter's Phone
G. State Facility's ID
H. Facility's Phone: (216) 621-2361

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. Hazardous Waste Solid, NOS OKM-E NA-4189	49	CM	24440	P	K069
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above
a. Lead Flue dust
b.
c.
d.

K. Handling codes for Wastes Listed Above
a. T04 Recycling
b.
c.
d.

15. Special Handling Instructions and Additional Information
SeaC# 4501

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, and all applicable state laws and 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: Vincent Grow Jr. — Signature: Vincent Grow Jr. — Date: Month 01 Day 14 Year 94

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Wes Saunderlin — Signature: Wes Saunderlin — Date: Month 01 Day 14 Year 94
18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Date: 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 in Item 19.
Printed/Typed Name: PTT Leasing Inc — Signature — Date: Month 01 Day 14 Year 94

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (609) 292-7172 (Night)

NJA0208720

EPA Form 8700-22 (Rev. 4-85) Previous edition obsolete

4 – TSD FACILITY COPY

HAZARDOUS WASTE MANIFEST

STRAIGHT BILL OF LADING—SHORT FORM—ORIGINAL—NON NEGOTIABLE

Manifest No.	Shipper No. 84777-OW-1	Carrier No.

RECEIVED, subject to the classifications and tariffs in effect on the date of this Original Bill of Lading.

AT 232 Forbes Rd., Bedford, OH FROM Vernitron Corporation Date May 13 1986

The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through 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 own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each 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 of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.

GENERATOR Vernitron Piezoelectric Division
EPA I.D. # OHD 052324290 **STATE I.D. #** 02-18-0649
ADDRESS 232 Forbes Road
CITY / STATE / ZIP Bedford, Ohio 44146-5478 **PHONE** 216-232-8600

TREATMENT / STORAGE / DISPOSAL FACILITY MASTER METALS INC.
EPA I.D. # OHD097613871 **STATE I.D. #**
ADDRESS 2850 West Third Street
CITY / STATE / ZIP Cleveland, Ohio 44113 **PHONE** 216-621-2361

NO. TYPE UNITS	DOT/EPA PROPER SHIPPING NAME	HAZARD CLASS	EPA HAZ MAT ID#	EPA HAZ WASTE #	WEIGHT	EXEMPTION OR NO LABELS REQ'D	UNITS
85 Drums	Hazardous Waste Solid (Lead) n.o.s. ORM-E NA 9139	Toxic Waste	D008	K052 K046	41,496.5 lbs.		

PLACARDS REQUIRED

SPECIAL HANDLING INSTRUCTIONS / COMMENTS

Note—Where the rate is dependent on value, shippers are requested to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

$ _____ per _____

"If the 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."

Signature

Subject to Section 7 of the conditions, 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

FREIGHT CHARGES
☐ PREPAID
☐ COLLECT

CERTIFICATION

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, MARKED AND LABELED, AND IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION AND THE ENVIRONMENTAL PROTECTION AGENCY.

SIGNATURE OF GENERATOR Kenneth S Kupcak PRINT NAME Kenneth S. Kupcak DATE 5-13-86

TRANSPORTER NO. 1 Master Metals, Inc. **EPA I.D. #** OHD09761387
ADDRESS 2850 West Third Street **STATE I.D. #**
CITY Cleveland, **STATE** Ohio **ZIP** 44113 **PHONE** 621-2361

THIS IS TO CERTIFY ACCEPTANCE OF THIS HAZARDOUS WASTE FOR TRANSPORTATION

TRANSPORTER NO. 1. SIGNATURE [signature] DATE May 13, 1986

TRANSPORTER NO. 2. _____ **EPA I.D. #** _____
ADDRESS _____ **STATE I.D. #** _____
CITY _____ **STATE** _____ **ZIP** _____ **PHONE** _____

THIS IS TO CERTIFY ACCEPTANCE OF THIS HAZARDOUS WASTE FOR TRANSPORTATION

TRANSPORTER NO. 2. SIGNATURE _____ DATE _____

TREATMENT STORAGE DISPOSAL FACILITY - THIS IS TO CERTIFY ACCEPTANCE OF THIS HAZARDOUS WASTE FOR TREATMENT, STORAGE, OR DISPOSAL.

D FACILITY SIGNATURE MASTER METALS R L Zenbert DATE 5/13/86

EMERGENCY RESPONSE INFORMATION	EMERGENCY ALTERNATE DESTINATION
CONTACT	T / S / D FACILITY
PHONE	ADDRESS EPA I.D. #
NATIONAL RESPONSE CENTER 1-800-424-8802 IN D.C. 426-2675	CITY / STATE / ZIP

SSC Safety Sign Company
13700 PROSPECT
CLEVELAND, O. 44136
PHONE 216/237-2211
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HAZARDOUS WASTE MANIFEST

STRAIGHT BILL OF LADING—SHORT FORM—ORIGINAL—NON NEGOTIABLE

Manifest No.	Shipper No. 84777-OW-2	Carrier No.

RECEIVED, subject to the classifications and tariffs in effect on the date of this Original Bill of Lading.

AT 232 Forbes Road, Bedford, OH FROM Vernitron Corporation Date 5-13-86 19

The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through 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 own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each 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 of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shipper and accepted for himself and his assigns.

GENERATOR Vernitron Piezoelectric Division
EPA I.D. # OHD 052324290 **STATE I.D. #** 02-18-0649
ADDRESS 232 Forbes Road
CITY / STATE / ZIP Bedford, Ohio 44146-5478 **PHONE** 216-232-8600

TREATMENT / STORAGE / DISPOSAL FACILITY Master Metals Inc.
EPA I.D. # OHD097613871 **STATE I.D. #**
ADDRESS 2850 West Third Street
CITY / STATE / ZIP Cleveland, Ohio 44113 **PHONE** 216-621-2361

NO. TYPE UNITS	DOT/EPA PROPER SHIPPING NAME	HAZARD CLASS	EPA HAZ MAT ID#	EPA HAZ WASTE #	WEIGHT	EXEMPTION OR NO LABELS REQ'D	UNITS
Drums	Hazardous Waste Solid (Lead) n.o.s. ORM-E NA 9139	Toxic Waste	D008	K052 K046	44,921.5 lbs.		

PLACARDS REQUIRED

SPECIAL HANDLING INSTRUCTIONS / COMMENTS

Note--Where the rate is dependent on value, shippers are requested to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

$ _____ per _____

"If the 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."

Signature

Subject to Section 7 of the conditions, 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

FREIGHT CHARGES
☐ PREPAID
☐ COLLECT

CERTIFICATION

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, MARKED AND LABELED, AND IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION AND THE ENVIRONMENTAL PROTECTION AGENCY.

SIGNATURE OF GENERATOR Kenneth S. Kupcak PRINT NAME Kenneth S. Kupcak DATE 5-13-86

TRANSPORTER NO. 1 Master Metals Inc. **EPA I.D. #** OHD09761387
ADDRESS 2850 West Third Street **STATE I.D. #**
CITY Cleveland **STATE** Ohio **ZIP** 44113 **PHONE** 621-2361

THIS IS TO CERTIFY ACCEPTANCE OF THIS HAZARDOUS WASTE FOR TRANSPORTATION

TRANSPORTER NO. 1 SIGNATURE John Wassinger DATE

TRANSPORTER NO. 2. **EPA I.D. #**
ADDRESS **STATE I.D. #**
CITY **STATE** **ZIP** **PHONE**

THIS IS TO CERTIFY ACCEPTANCE OF THIS HAZARDOUS WASTE FOR TRANSPORTATION

TRANSPORTER NO. 2. SIGNATURE DATE

TREATMENT STORAGE DISPOSAL FACILITY - THIS IS TO CERTIFY ACCEPTANCE OF THIS HAZARDOUS WASTE FOR TREATMENT, STORAGE, OR DISPOSAL.

TSD FACILITY SIGNATURE Master Metals K. L. Zendt DATE 5/14/86

EMERGENCY RESPONSE INFORMATION	EMERGENCY ALTERNATE DESTINATION
CONTACT	T / S / D FACILITY
PHONE	ADDRESS EPA I.D. #
NATIONAL RESPONSE CENTER 1-800-424-8802 IN D.C. 426-2675	CITY / STATE / ZIP

SSC Safety Sign Company
13700 PROSPECT
CLEVELAND, O. 44136
PHONE 216/237-2211
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UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. GAD9906751118 MAN. DOC. # 00059

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
SEITZINGER INC
900 ASHBY ST. ATLANTA GA 30318

4. Generator's Phone (404) 876 3787

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name
JACK GREY TRANSPORT

6. US EPA ID Number
ILND042534875

C. State Transporter's ID

D. Transporter's Phone

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
MASTER METALS 2850 WEST ST.
CLEVELAND OHIO 44113

10. US EPA ID Number
OHD097613871

G. State Facility's ID

H. Facility's Phone

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 Hazardous Waste Solid Bag Collector Dust NOS ORM-E NA9189	BULK		43830	lbs	K069
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
Do not wash spills into creeks or streams

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 governmental regulations.

Printed/Typed Name: KEITH E SARGENT
Signature: Keith Sargent
Date: Month 10 Day 30 Year 86

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: [illegible]
Signature: [illegible]
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 in Item 19.
Printed/Typed Name: [illegible]
Signature: [illegible]
Date: Month Day Year

GENERATOR

TRANSPORTER

FACILITY

EPA Form 8700-22 (3-84)

BILLING CODE 6560-50-C

mailed copy to generator 5/5/86

COPY 4

lease 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. GAD990675111 MAN. DOC. # 00060

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
SEITZINGER INC
900 ASHBY ST ATLANTA GA 30318

4. Generator's Phone (404 876 3787

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name
Jack Grey Transport

6. US EPA ID Number
IND425348751

C. State Transporter's ID

D. Transporter's Phone

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
MASTER METALS 2850 WEST ST.
CLEVELAND OH 44113

10. US EPA ID Number
10110097613871

G. State Facility's ID

H. Facility's Phone

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 HAZARDOUS WASTE SOLID BAG COLLECTOR DUST NOS ORME NA9189	BULK		41220	lbs	K069
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
Do not wash spills into creaks or streams

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 governmental regulations.

Printed/Typed Name: KEITH E SARGENT
Signature: Keith E Sargent
Date: Month 05 Day 09 Year 86

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: FRANK E. MORBERLY
Signature: [signature]
Date: Month 5 Day 9 Year 86

18. Transporter 2 Acknowledgement or 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 in Item 19.
JERRY L. MOODY

Signature
Date: Month Day Year

GENERATOR

TRANSPORTER

FACILITY

VHW-001 (REV. 9-84)

State of New Jersey
Department of Environmental Protection
Division of Waste Management
CN 028, Trenton, NJ 08625

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

Form Approved. OMB No. 2000-0404. Expires 7-31-86

FORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No: NJ4999995430
Manifest Document No.
2. Page 1 of 1
Information in the shaded areas is not required by Federal law *

A. State Manifest Document Number: **NJA 0208707**

3. Generator's Name and Mailing Address: E.I. DuPont de Nemours, Chambers Work, Deepwater, NJ 08023
B. State Gen. ID: Same
4. Generator's Phone: (609) 540-3549

5. Transporter 1 Company Name: Lacy Express
6. US EPA ID Number: NJ9946515093
C. State Transporter 1 ID: NJDEP-8193, 609-299-2569 DECAL #-2365

7. Transporter 2 Company Name:
8. US EPA ID Number:
D. Transporter's Phone: 609-299-2569

9. Designated Facility Name and Site Address: Maskel Metals Inc, 2850 W. 3rd St, Cleveland, OHIO 44113
10. US EPA ID Number: OHD004439711
E. State Transporter 2 ID:
F. Transporter's Phone:
G. State Facility's ID:
H. Facility's Phone:

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. Hazardous Waste, Solid, NOS ORM-E NA 9189	18	CM	41,500	R	K069
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above
a. Lead Fine dust
b.
c.
d.

K. Handling codes for Wastes Listed Above
a. D-84
b.
c.
d.

15. Special Handling Instructions and Additional Information
Seal # 4341

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, and all applicable state laws and 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: James L. Akers
Signature:
Date: Month 9 Day 9 Year 84

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Wes Saunderlin
Signature:
Date: Month 9 Day 9 Year 84

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 in Item 19
Maskel Metals Inc.
Printed/Typed Name: Maskel Metals
Signature:
Date: Month Day Year

GENERATOR

TRANSPORTER

FACILITY

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection

NJA0208707

EPA Form 8700-22 (Rev. 4-85) Previous edition obsolete

4 – TSD FACILITY COPY

State of New Jersey
Department of Environmental Protection
Division of Waste Management
CN 028, Trenton, NJ 08625

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.: NJD002385730 — Manifest Document No.:
2. Page 1 of 1 — Information in the shaded areas is not required by Federal law *

3. Generator's Name and Mailing Address: E I Dupont de Nemours, Chambers Works, Deepwater, NJ 08023
4. Generator's Phone: (609) 540-3547
A. State Manifest Document Number: NJA0208715
B. State Gen. ID: Same
5. Transporter 1 Company Name: Lacy Express
6. US EPA ID Number: NJD046555033
C. State Transporter 1 ID: 8193 Decal # 6365
7. Transporter 2 Company Name:
8. US EPA ID Number:
D. Transporter's Phone: (609) 299-2569
9. Designated Facility Name and Site Address: Master Metals Inc, 2850 W 3rd St, Cleveland, Ohio 44113
10. US EPA ID Number: OHD097913871
E. State Transporter 2 ID:
F. Transporter's Phone:
G. State Facility's ID:
H. Facility's Phone:

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. Hazardous Waste Solid, NOS ORM E NA 9189	18	CM	41000	P	K069
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above
a. Lead Flue dust
b.
c.
d.

K. Handling codes for Wastes Listed Above
a. T-04 reclaim
b.
c.
d.

15. Special Handling Instructions and Additional Information: Seal # 4347

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, and all applicable state laws and 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: Simon H. Shute — Signature: [signature] — Date: Month 07 Day 30 Year 86

17. Transporter 1 Acknowledgement of Receipt of Materials — Date
Printed/Typed Name: Wes Saunderlin — Signature: [signature] — Month 07 Day 01 Year 86

18. Transporter 2 Acknowledgement of Receipt of Materials — Date
Printed/Typed Name: — Signature: — 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 in Item 19. — Date
Printed/Typed Name: [illegible] — Signature: [signature] — Month 07 Day 02 Year 86

GENERATOR — TRANSPORTER — FACILITY

In case of emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (609) 292-7172 (Night)

NJA0208715

EPA Form 8700-22 (Rev. 4-85) Previous edition obsolete

4 – TSD FACILITY COPY

State of New Jersey
Department of Environmental Protection
Division of Waste Management
CN 028, Trenton, NJ 08625

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. | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.*

3. Generator's Name and Mailing Address: 4 I Dupont de Nemours Chambers Works, Deepwater, NJ 08023

4. Generator's Phone: (609) 540-2476

5. Transporter 1 Company Name: Gary's Express | 6. US EPA ID Number: NJD 981595013

7. Transporter 2 Company Name | 8. US EPA ID Number

9. Designated Facility Name and Site Address: Metal Metals Inc, 2850 W 3rd St, Cleveland, Ohio 44113 | 10. US EPA ID Number: OHD 980614374

A. State Manifest Document Number: **NJA0208716**

B. State Gen. ID: Same

C. State Transporter 1 ID: NJDEP 8193, DOT # 6365

D. Transporter's Phone: 609-299-2969

E. State Transporter 2 ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone: (216) 621 2361

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. Hazardous Waste Solid, NOS ORM-E NA 9189	14	CM	46790	P	K069
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above
a. Lead Fine dust
b.
c.
d.

K. Handling codes for Wastes Listed Above
a. T-04 Reclaim
b.
c.
d.

15. Special Handling Instructions and Additional Information
Seal # 4351

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, and all applicable state laws and 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: Vincent Grant Jr | Signature: Vincent F Grant Jr | Date: Month 07 Day 03 Year 16

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: BRUCE COOMBS | Signature: Bruce Coombs | Date: Month 07 Day 14 Year 16

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Date: 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 in Item 19.
Metal Metals Inc
Printed/Typed Name: Peter Tomczak | Signature | Date: Month 07 Day 07 Year 16

In case of emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (609) 292-7172 (Night)

EPA Form 8700-22 (Rev. 4-85) Previous edition obsolete

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