U.S.ENVIRONMENTAL PROTECTION AGENCY

REGION V

EASTERN DISTRICT OFFICE

STATE NOTIFICATION OF INSPECTION

Authority: ____SECTION 114(d)(1)-CLEAN AIR ACT, AS AMENDED

_V_ CWA, ____TSCA, ____RCRA, ____SWDA

Source Name WCI Steel

Address 1040 Pine Ave. SE

City Warren

State OH

Person Notified Erm Gomes

Title env. engr.

Organization OEPA-NEDO

Date of Notification 11-9-94

Planned Date of Inspection 11/29-30/94

Purpose of Inspection(complaince monitoring, Enforcement Division request etc.)

Water Div. request

Scope CSI

Person Giving Notice Mark E. Conti

Title Environmental Engineer

Organization ESD/EDO

Mark E Conti
(signature)

(A copy of this notification must accompany each Air inspection report).
For all other types of inspections include with file copy of report.

EPA REGION 5 OFFICE ROUTING & TRANSMITTAL SLIP

Mail Code	ACTIVITY	Mail Code	ACTIVITY
R-19J	REGIONAL ADMINISTRATOR	MI-13J	Information Management
A-18J	AIR AND RADIATION DIRECTOR	MISR-12J	Records Management
AE-17J	Air Enforcement	MB-19J	Planning and Budget
AT-18J	Air Toxics and Radiation	P-19J	PUBLIC AFFAIRS
AR-18J	Regulation Development	PG-12J	Graphic Arts
N-4D	CRIMINAL INVESTIGATIONS	PL-12J	Library
C-3T	REGIONAL COUNSEL	H-7J	WASTE MANAGEMENT DIRECTOR
CA-3T	Air/Water/Toxics and General Law	HR-8J	RCRA Director
CS-3T	Solid Waste and Emergency Response	HRE-8J	Enforcement
S-14J	ENVIRONMENTAL SCIENCES DIRECTOR	HRP-8J	Permitting
SL-10C	Central Regional Laboratory	HRM-7J	Program Management
SC-9C	Central District Office	HRU-8J	Underground Storage Tanks
SE-W	Eastern District Office	HS-6J	Superfund Director
SG-14J	Geographic Information Systems	HSC-9J	Chemical & Emergency Preparedness
SQ-14J	Monitoring and Quality Assurance	HSE-5J	Emergency Response
SP-14J	Pesticides and Toxic Substances	HSE1-G	Response Section 1 (Grosse Ile)
G-9J	GREAT LAKES PROGRAM	HSM-5J	Program Management
IA-13J	INSPECTOR GENERAL - Audit	HSRL-6J	IL/IN Remedial Response
II-13J	INSPECTOR GENERAL - Investigations	HSRLT-5J	Technical Support
M-19J	PLANNING AND MANAGEMENT DIRECTOR	HSRM-6J	MN/OH Remedial Response
MC-10J	Contracts and Grants	HSRW-6J	WI/MI Remedial Response
ME-19J	Environmental Review	W-15J	WATER DIRECTOR
MF-10J	Financial Management	WC-15J	Compliance
MS-13J	Facilities Management & Services	WG-16J	Ground Water Protection
MSS-16J	Supply Room	WD-17J	Safe Drinking Water
MP-4J	Human Resources	WQ-16J	Water Quality
MPT-12J	Training		
MPS-12J	Safety		

ATTENTION:

REMARKS *(Use reverse if more space is needed)*

~~JC~~ 3-17-95 ~~Mike Mikulka~~
~~WC-15J~~

Thad Slaughter HRE-8J

FROM Murray Lantner

DATE 5/1/95

PA - RS 1750-4 (3/92)

Printed on Recycle paper

cc: Nicole
Thad
Paul Ruerch
Leslie Lenhert

Travel

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
EASTERN DISTRICT OFFICE
25089 CENTER RIDGE ROAD
WESTLAKE, OH 44145

RECEIVED
MAR 15 1995
COMPLIANCE SECTION

March 10, 1995

MEMORANDUM

SUBJECT: Compliance Sampling Inspection - WCI Steel, Inc., Warren, Ohio (OH0101709, AFE107:GG)

FROM: Mark E. Conti, MEC environmental engineer

THRU: A. R. Winklhofer, chief
Eastern District Office (SE-W)

TO: Water Compliance Section (WC-15J)
ATTN: Michael Mikulka, chief

On November 29-30, 1994, Michael Patton, Larry Lins, and I conducted a compliance sampling inspection at WCI Steel. The inspection was requested by the Water Division. My findings are summarized in the attached report. If you have any questions regarding the report, please contact me at 216/522-7260.

Attachments

Recycled/Recyclable
Printed on paper that contains at least 75% recycled fiber

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5
ENVIRONMENTAL SCIENCES DIVISION
EASTERN DISTRICT OFFICE

Compliance Sampling Inspection Report

I. PERMITTEE IDENTIFICATION

A. Facility Name and Address

WCI Steel, Inc.
1040 Pine Avenue SE
Warren, Ohio 44483-6528

B. Responsible Official

Thomas O. Shepker, manager-environmental control
telephone number: 216/841-8200

C. NPDES Permit

NPDES permit number: OH0101079
effective date: April 30, 1990
modification date: January 19, 1993
expiration date: April 17, 1995

D. Receiving Water

Mahoning river

II. DATES OF INSPECTION

November 29-30, 1994

III. PARTICIPANTS

A. Facility

Keith A. McLaughlin, environmental engineer
telephone number: 216/841-8201 or 8162

B. U.S. Environmental Protection Agency - EDO

Mark E. Conti, environmental engineer
Michael Patton, engineering technician
Larry Lins, engineering technician

C. Ohio EPA - Northeast District Office

Ermelindo Gomes - environmental engineer
Karl Hoerig

IV. OBJECTIVES

The objectives of the inspection were to determine: (1) compliance with pH limits; (2) whether the facility's discharges contribute to elevated zinc levels at Intake Station 804; (3) whether a cross connection exists between the blast furnace recycle system and blast furnace non-contact cooling water; and (4) compliance status at Internal Station 602 and Outfall 013.

V. SUMMARY OF FINDINGS

A. Visual Observations of Outfalls

On November 29 and 30, 1994, I made visual observations of the facility's outfalls. My observations are summarized in Tables 1 and 2. There was an oily sheen on the discharge of Outfall 010 on both dates. Part III.2. of the facility's NPDES permit prohibits oily sheens. Sample results for Outfall 010 are discussed in Paragraph F.

B. Temperature and pH Measurements

On November 29 and 30, 1994, we measured the temperature and pH at outfalls, internal stations, and in the Mahoning river. The results are summarized in Tables 3 and 4.

1. On November 29, we measured the pH at Outfall 017 twice during the day. The values were 1.92 s.u. at a measured flow rate of 7.5 gpm and 2.28 s.u. at a measured flow rate of 7.0 gpm. Mr. McLaughlin checked the pH at the outfall later that night and found it to be about 2.1 s.u. This outfall is supposed to be limited to groundwater and stormwater runoff from the No.6 Pickle Line and acid regeneration plant areas. Mr. McLaughlin told us that there have been instances of low pH at the outfall in the past. Consequently, the facility had plugged the outfall with an inflatable stopper. Backed up water was then pumped from Lift Station No.9 to Pond No.5. The plug may have been forced out of the pipe by hydraulic pressure. Mr. McLaughlin had the plug reinserted the night of November 29. The pipe and reinserted plug are shown in Photograph No.1.

2. On November 29, we measured a pH of 9.10 s.u.at Outfall 010. The facility's permit limit is 9.0 s.u.

3. On November 30, we measured a pH of 10.30 s.u. at Internal Station 602. The facility continuously monitors the pH of the discharge. The permit limit is 7-10 s.u. The pH may not be outside this range for more than 7 hours and 26 minutes in any calendar month, nor may any individual excursion exceed 60 minutes.

4. The pH at Outfall 002 was within the permitted range, but it varied more than I would expect for a groundwater/stormwater outfall. On November 29, the pH was 7.23 s.u. On November 30, the pH was 8.12 s.u. There was not any precipitation either day.

C. Zinc Levels in Mahoning River

The zinc concentration was measured in the Mahoning river upstream of WCI Steel's outfalls and at Intake Station 804. The results did not show an increased concentration at Intake Station 804 versus upstream. The results are summarized in Table 5.

D. Sampling for Blast Furnace Non-Contact Cooling Water Contamination

Ammonia, cyanide, and zinc concentrations were measured at Intake Station 804 and Internal Station 608, which is once-through non-contact cooling water for the blast furnace. There was not a significant increase of the pollutants in the cooling water. The results are summarized in Table 6.

E. Compliance Sampling at Internal Station 602

The lead and zinc loadings were below the facility's discharge limitations. The results are summarized in Table 7.

F. Compliance Sampling at Outfall 010

Oil and grease was sampled on November 29 and 30 in conjunction with visual observations. The oil and grease concentrations were below the facility's discharge limitation. The results are summarized in Table 8.

G. Compliance Sampling at Outfall 013

The ammonia, cyanide, lead, and zinc concentrations were below the facility's discharge limitations. The results are summarized in Table 9.

H. Metals Sampling at Outfall 017

A grab sample for metals analysis was collected at Outfall 017 on November 29. The concentration of zinc, iron, copper, and lead were particularly high. The low pH and high metals concentrations suggest that pickle line rinse water was being directly discharged. The metals results are summarized in Table 10.

I. Other

1. The facility is pretreating acidic wastewaters at Lift Station No.9 with a lime slurry. This is done to neutralize the wastewaters before they enter the equalization/skimming ponds. On November 29, we measured a pH of 6.88 s.u. at the central treatment plant influent. The central treatment plant receives wastewater from Pond No.6.

2. Pond No.6 continues to leak. Leaking water is collected in Ponds No.6A and 6AA. Water is pumped back to Pond No.6 from Pond No.6A. Pumps are activated by a float system. At the time of the inspection, the oily sludge from Pond No.6A was being dredged. There was no signs of leakage from Ponds No.6A or 6AA into the Mahoning river.

LIST OF ATTACHMENTS

ATTACHMENT NUMBER	DESCRIPTION
1	Tables
2	Photographs
3	EPA Form 3560-3

ATTACHMENT 1

LIST OF TABLES

TABLE NUMBER	TITLE
1	Visual Observations of Outfalls on 11-29-94
2	Visual Observations of Outfalls on 11-30-94
3	Field Measurements for pH and Temperature on 11-29-94
4	Field Measurements for pH and Temperature on 11-30-94
5	Comparison of Zinc Concentrations in Upstream Mahoning River Sample with Intake Station 804
6	Comparison of Ammonia, Cyanide, and Zinc Concentrations at Intake 804 with Blast Furnace Non-Contact Cooling Water
7	Comparison of Lead and Zinc Concentrations at Internal Station 602 with NPDES Permit Limitations
8	Comparison of Oil and Grease Concentrations at Outfall 010 with NPDES Permit Limitations
9	Comparison of Lead and Zinc Concentrations at Outfall 013 with NPDES Permit Limitations
10	Results for Sample Collected at Outfall 017

TABLE 1

Visual Observations of Outfalls on 11-29-94

Outfall	Time	Observation
002	1258 EST	Effluent was clear and colorless.
003	1304 EST	Effluent had very light solids and was colorless.
004	1315 EST	No flow. Outfall was welded shut.
006	1350 EST	Effluent had a moderate amount of solids and was medium brown in color.
007	1400 EST	Effluent had very light solids and was pale yellow-brown in color.
008	1403 EST	Effluent had very light solids and was pale brown in color.
009	1410 EST	No flow. Outfall was cemented shut.
010	1441 EST	Effluent was clear and pale brown in color. Effluent had an oily sheen. Oil was not visible in channel between outfall and river.
011	1422 EST	Effluent was clear and colorless.
012	1428 EST	Effluent was clear and colorless.
013	--	Not observed.
017	1320 EST	Effluent was clear and pale yellow-brown in color.

TABLE 2

Visual Observations of Outfalls on 11-30-94

Outfall	Time	Observation
002	0815 EST	Effluent was clear and colorless.
003	0824 EST	Effluent had very light solids and was colorless.
004	0829 EST	No flow. Outfall was welded shut.
006	0832 EST	Effluent had a light to moderate amount of solids and was medium rust-brown in color.
007	0848 EST	Effluent was clear and colorless.
008	0900 EST	Effluent was clear and pale yellow in color.
009	0906 EST	No flow. Outfall was cemented shut.
010	0915 EST	Effluent was clear and was pale brown in color. Effluent had an oily sheen. Oil was not visible in channel between outfall and river.
011	0928 EST	Effluent was clear and colorless.
012	0934 EST	Effluent was clear and colorless.
013	1103 EST	Effluent was clear and pale yellow-brown in color.
017	0832 EST	No flow. Outfall was plugged with an inflatable stopper.

TABLE 3

Field Measurements for pH and Temperature on 11-29-94

Sample Location	Time	pH[1] (s.u.)	Temperature (°C)
upstream	--	--	--
outfall 002	1258 EST	7.23	11.5
outfall 003	1304 EST	8.04	11.3
outfall 017	1320 EST 1520 EST	1.92 2.28	14.3 16.9
outfall 006	1350 EST	7.42	17.0
outfall 007	1400 EST	8.07	9.7
outfall 008	1403 EST	8.16	11.5
outfall 010	1441 EST	9.10	7.5
outfall 011	1422 EST	8.39	9.0
outfall 012	1428 EST	8.34	9.0
outfall 013	1124 EST	8.53	14.3
intake 804	1135 EST	7.88	5.9
CTP influent[2]	1022 EST	6.88	22.6
internal 602	1006 EST	9.54	23.1
internal 608	1107 EST	7.82	15.6

[1]The pH at these outfalls shall not be less than 6.5 s.u. nor greater than 9.0 s.u. The pH at internal station 602 shall not be less than 7.0 s.u. nor greater than 10.0 s.u. The total time during which pH values are outside this range shall not exceed 7 hours and 26 minutes in any calendar month, and no individual excursion shall exceed 60 minutes.

[2]CTP influent is wastewater pumped from No.6 pond to the central treatment plant.

TABLE 4

Field Measurements for pH and Temperature on 11-30-94

Sample Location	Time	pH[1] (s.u.)	Temperature (°C)
upstream[2]	0805 EST	7.82	3.9
outfall 002	0815 EST	8.12	10.5
outfall 003	0824 EST	8.08	11.4
outfall 017	--	--	--
outfall 006	0832 EST	7.40	22.3
outfall 007	0848 EST	8.11	7.4
outfall 008	0900 EST	8.01	9.6
outfall 010	0915 EST	8.40	9.6
outfall 011	0928 EST	8.39	7.5
outfall 012	0934 EST	7.98	8.0
outfall 013	1103 EST	8.25	11.4
intake 804	1055 EST	8.38	5.0
CTP influent	--	--	--
internal 602	1013 EST	10.30	22.6
internal 608	1038 EST	7.94	15.6

[1]The pH at these outfalls shall not be less than 6.5 s.u. nor greater than 9.0 s.u. The pH at internal station 602 shall not be less than 7.0 s.u. nor greater than 10.0 s.u. The total time during which pH values are outside this range shall not exceed 7 hours and 26 minutes in any calendar month, and no individual excursion shall exceed 60 minutes.

[2]The upstream sample was collected from the Mahoning river upstream of all NPDES permitted outfalls and stormwater outfalls. The sample was collected immediately upstream of the furthest upstream stormwater outfall.

TABLE 5

Comparison of Zinc Concentration in Upstream Mahoning River Sample with Intake Station 804

Pollutant	Sample Location	
	Upstream[1]	Intake 804[2]
Zinc, total	26 µg/L	<20 µg/L

[1]Sample was collected upstream of all NPDES outfalls and stormwater outfalls. Sample was a 24-hour composite sample collected from 0945-0845 EST 11/29-30/94. Equal volume aliqots were collected hourly.

[2]Sample was a 24-hour composite sample collected from 1145-1045 EST 11/29-30/94. Equal volume aliqots were collected hourly.

Note: "<" indicates that the concentration was below the detection level. The numerical value following the "<" sign is the detection level.

TABLE 6

Comparison of Ammonia, Cyanide, and Zinc Concentrations at Intake 804 with Blast Furnace Non-Contact Cooling Water

Pollutant	Sample Location	
	Intake 804[1]	Internal 608[2]
Ammonia	<0.05 mg/L	<0.05 mg/L
Cyanide, total	<8 μg/L	<8 μg/L
Zinc, total	<20 μg/L	24 μg/L

[1]Sample was a 24-hour composite sample collected from 1145-1045 EST 11/29-30/94. Equal volume aliqots were collected hourly.

[2]Sample was a 24-hour composite sample collected from 1115-1015 EST 11/29-30/94. Equal volume aliqots were collected hourly.

Note: "<" indicates that the concentration was below the detection level. The numerical value following the "<" sign is the detection level.

TABLE 7

Comparison of Lead and Zinc Concentrations at Internal Station 602 with NPDES Permit Limitations

Pollutant	Discharge Limitation		U.S. EPA Sample Results[1]	
	30 Day	Daily	Conc.	Loading[2]
Lead, total	1.61 kg/d	4.61 kg/d	<80 μg/L	<0.39 kg/d
Zinc, total	2.16 kg/d	6.32 kg/d	<40 μg/L	<0.20 kg/d

[1]Sample was a 24-hour composite sample collected from 1115-1015 EST 11/29-30/94. Equal volume aliquots were collected hourly.

[2]Loadings are based on a 24-hour flow of 1.29 million gallons. WCI Steel recorded a total flow of 1.29 million gallons at the discharge of the central treatment plant's final clarifier from 8:00 a.m. to 8:00 a.m. 11/29-30/94.

Note: "<" indicates that the concentration was below the detection level. The numerical value following the "<" sign is the detection level. Where concentrations were below detection, the loading was calculated using the detection level.

TABLE 8

Comparison of Oil and Grease Concentrations at Outfall 010 with NPDES Permit Limitations

Date/Time	Discharge Limitation		Oil & Grease Results
	30 Day	Daily	
11-29-94/1441 EST	15 mg/L	20 mg/L	3.3 mg/L
11-30-94/0915 EST	15 mg/L	20 mg/L	1.3 mg/L

TABLE 9

Comparison of Lead and Zinc Concentrations at Outfall 013 with NPDES Permit Limitations

Pollutant	Discharge Limitation		Results[1]
	30 Day	Daily	
Ammonia	0.92 mg/L	1.09 mg/L	<0.05 mg/L
Cyanide, total	0.017 mg/L	0.020 mg/L	<0.008 mg/L
Lead, total	17 μg/L	63 μg/L	2 μg/L
Zinc, total	31 μg/L	53 μg/L	28 μg/L

[1]Sample was a 24-hour composite sample colected from 1130-1030 EST 11/29-30/94. Equal volume aliquots were collected hourly.

Note: "<" indicates that the concentration was below the detection level. The numerical value following the "<" sign is the detection level.

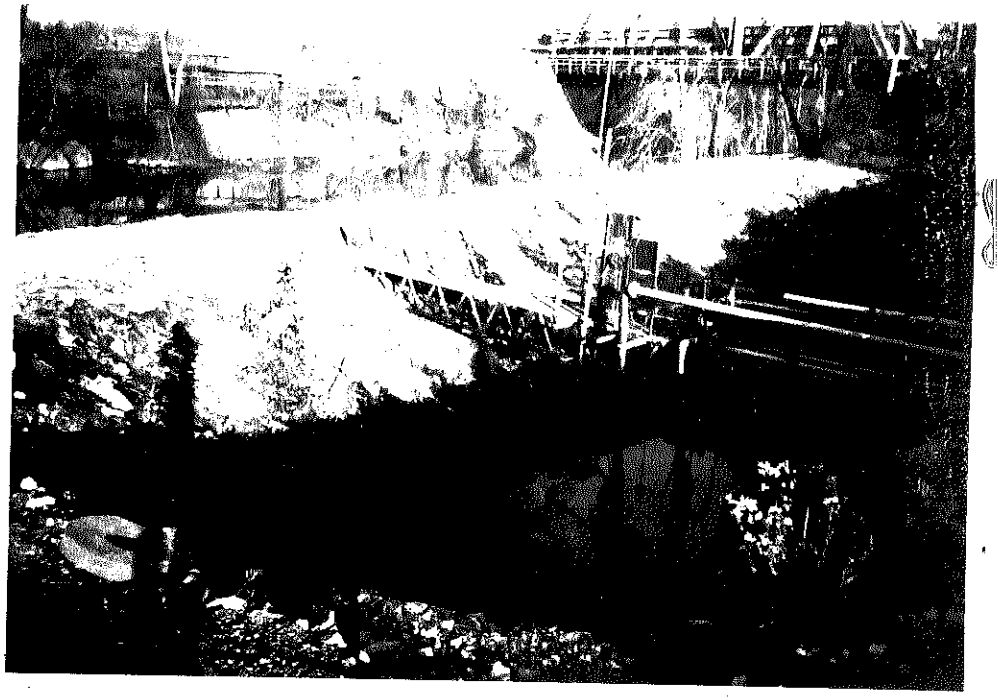
TABLE 10

Results for Sample Collected at Outfall 017

Parameter	Concentration, μg/L
aluminum	36000
barium	161
beryllium	4
boron	28
cadmium	<10
calcium	284000
chromium	253
cobalt	13
copper	5360
iron	167000
lead	2730
lithium	64
magnesium	29000
manganese	4970
molybdenum	22
nickel	220
potassium	8000
silver	<6
sodium	46000
strontium	670
tin	<40
titanium	373
vanadium	62
yttrium	22
zinc	37000

Notes: 1. The sample was a grab collected at 1320 EST, 11-29-94. The measured flow rate at 1335 EST was 7.5 gpm. 2. "<" indicates that the concentration was below the detection level. The numerical value following the "<" sign is the detection level.

ATTACHMENT 2



No. 2 of 3
FAC/SITE NAME: WCI Steel Inc.

CITY: Warren **STATE:** OH
DATE: November 30, 1994
TIME: 0906 EST
DESCRIPTION: Pond No.6A.
Mahoning river is in background.

CONDITIONS: Partly cloudy
CAMERA: Canon AS-6 **NO.** N00171
FILM: Scotch ISO 400
PHOTO BY: Mark E. Conti
ORG. CODE: Eastern District Office

No. 1 of 3
FAC/SITE NAME: WCI Steel Inc.

CITY: Warren **STATE:** OH
DATE: November 30, 1994
TIME: 0832 EST
DESCRIPTION: Inflatable plug in dicharge pipe at Outfall 017.

CONDITIONS: Partly cloudy
CAMERA: Canon AS-6 **NO.** N00171
FILM: Scotch ISO 400
PHOTO BY: Mark E. Conti
ORG. CODE: Eastern District Office

No. 3 of 3
FAC/SITE NAME: WCI Steel Inc.

CITY: Warren **STATE:** OH
DATE: November 30, 1994
TIME: 0906 EST
DESCRIPTION: Pond No.6AA
Mahoning river is in background.

CONDITIONS: Partly cloudy
CAMERA: Canon AS-6 **NO.** N00171
FILM: Scotch ISO 400
PHOTO BY: Mark E. Conti
ORG. CODE: Eastern District Office

ATTACHMENT 3

EPA

United States Environmental Protection Agency
Washington, D. C. 20460

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2 5	3 OH 01 01 079 11	12 941129 17	18 S	19 J	20 2

Remarks

21 66

Reserved	Facility Evaluation Rating	BI	QA	Reserved
67 69	70 3	71 N	72 N	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
WCI Steel, Inc. 1040 Pine Ave. Warren, OH 44483-6528	[X] AM [ ] PM 8:15	4-30-90
	Exit Time/Date 11:30 AM/11-30-94	Permit Expiration Date 4-17-95

Name(s) of On-Site Representative(s)	Title(s)	Phone No(s)
Keith A. McLaughlin	environmental engineer	(216) 841-8201 or 8162

Name, Address of Responsible Official	Title	
Thomas O. Shepker 1040 Pine Avenue SE Warren, OH 44483-6528	mgr.-environmental control	
	Phone No. (216) 841-8200	Contacted [ ] Yes [X] No

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

N	Permit	N	Flow Measurement	N	Pretreatment	N	Operations & Maintenance
N	Records/Reports	N	Laboratory	N	Compliance Schedules	N	Sludge Disposal
S	Facility Site Review	*	Effluent/Receiving Waters	N	Self-Monitoring Program	—	Other:

Section D: Summary of Findings/Comments *(Attach additional sheets if necessary)*

* see narrative report

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone	Date
Mark E. Conti Mark E. Conti	USEPA/EDO/216-835-5200	3-10-95
Signature of Reviewer	**Agency/Office**	**Date**
Philip E. Gehring	USEPA Reg 5 EDO	3/10/95

Regulatory Office Use Only

Action Taken	Date	Compliance Status
		[ ] Noncompliance [ ] Compliance

EPA Form 3560-3 (Rev. 3-85) Previous editions are obsolete.

RCRA HAZARDOUS WASTE GENERATOR
COMPLIANCE EVALUATION INSPECTION CHECKLIST

Facility: WCI STEEL INC.

USEPA I.D.: OHD 060 409 521

Street: 1040 PINE AVE S.E.

City: WARREN State: OH Zip: 44483-6528

County: TRUMBELL Telphone: (216) 841-8200

Owner/Operator: WCI STEEL INC

Street:

City: State: Zip:

Telephone: Fax: (216) 841-8392

Inspection Date: 5/26-27/93 Time: -

Advance notice of inspection given? (yes) X (no) ____
If so, how far in advance? ~2 weeks

	Name	Agency/Title	Phone
Inspectors:	DAVID R. BARNA	USEPA ENV ENGR	(216) 935-5200
Facility Representative:	THOMAS O. SHEPKER	WCI, MANAGER	(216) 841-8200
	KEITH A. McLAUGHLIN	WCI, ENV. ENGR	(216) 841-8162
	RICHARD J. GRADISHAR	WCI, ENV. ENGR	(216) 841-8201

STATUS

Cond. Exempt SQG ___ SQG ___ Large Quantity Generator X
LDR Checklist Attached: (yes) X (no) ____

NOTE: LDR requirements are not applicable to CESQGs.

ACTIVITIES

Containers___
Tanks X
Wastepile___
Landfill___
Surface Impoundment___

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

Revised: (5/29/92)

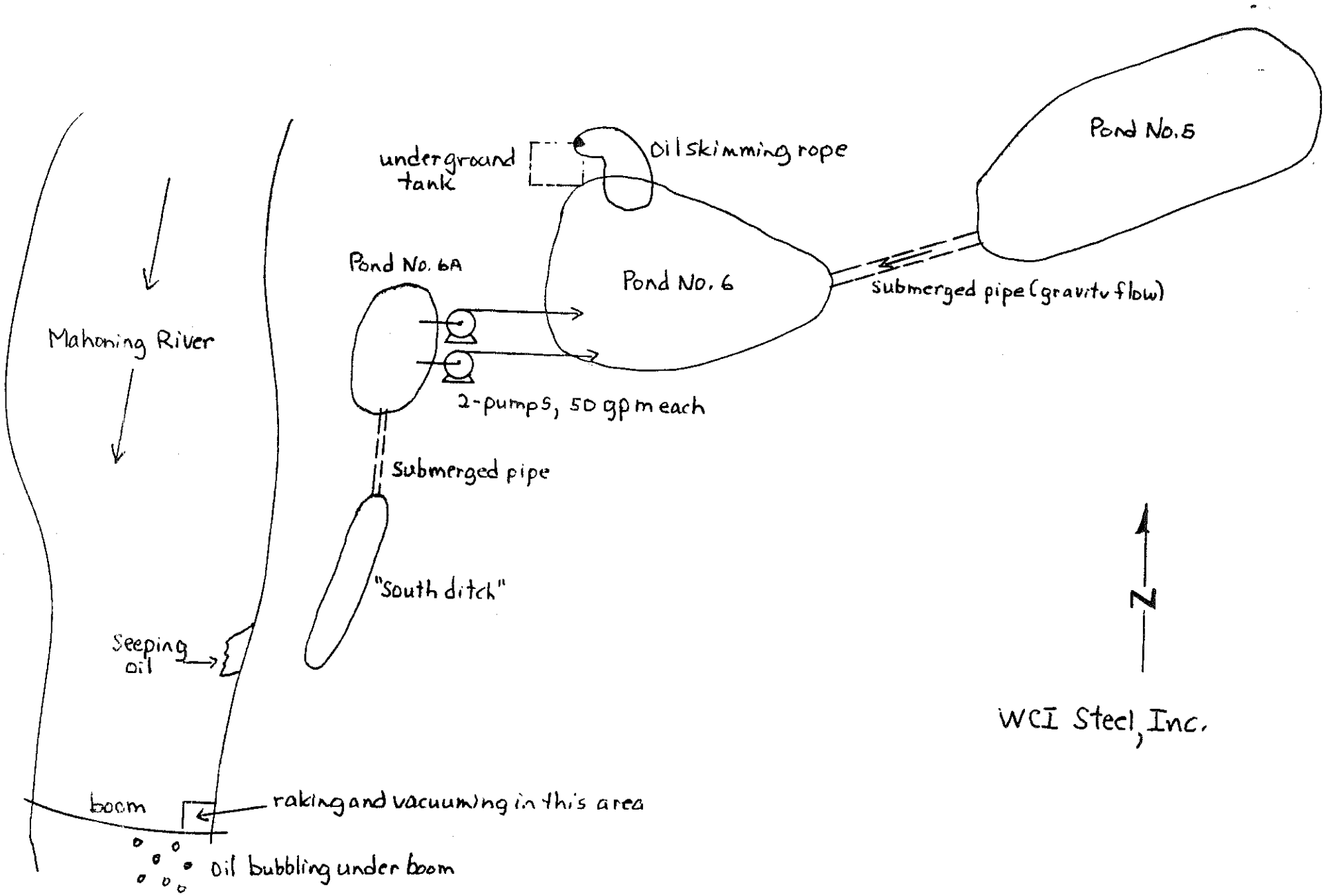


FIGURE 2.- Sketch of Ponds on May 12, 1993.

- Not to scale -
M. Conti 9-30-93

REMARKS - GENERAL INFORMATION

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

Refer to Narrative Report.

GENERATOR CLASSIFICATION (OAC 3745-52-34)

Does the facility:

1. Generate < 100 Kg (25-30 gallons) of hazardous waste in a calendar month?

   (yes) _____ (no) X

   If so, the facility is classified as a Conditionally Exempt Small Quantity Generator, unless 3.b. applies. Please complete the **Conditionally Exempt Small Quantity Generator Requirements** checklist.

2. Generate between 100 and 1000 Kg of hazardous waste in a calendar month? (about 25 to under 300 gallons)

   (yes) _____ (no) X

   If so, the facility is classified as a Small Quantity Generator, unless 3.b. applies. Please stop here and complete the **Small Quantity Generator Requirements** checklist.

3. a. Generate > 1000 Kg (~ 300 gallons) of hazardous waste in a calendar month?

   (yes) X (no) _____

   or;

   b. Generate > 1 Kg of acutely hazardous waste in a calendar month?

   (yes) _____ (no) X

   If so, the facility is classified as a Large Quantity Generator. Please complete the **Large Quantity Generator Requirements** checklist.

REMARKS - GENERATOR CLASSIFICATION

OAC 3745-52 - LARGE QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11) **Y/N/NA RMK #**

1. Have wastes generated at the facility been evaluated in compliance with the waste evaluation requirements of OAC rule 3745-52-11(A)(B) and (C)? ____ (1)

   (a) Has the generator's evaluation identified in Question #1 included an evaluation for the (TC) Toxicity Characteristics identified in 3745-51-24? [3745-52-11(C)] ____ (1)

NOTE: The TC rule requirement noted above must include an evaluation of the metal as well as organic TC constituents identified in 3745-51-24.

If not, specify those waste streams which the generator has failed to adequately evaluate:

(1) Routinely generated wastes, sludges, dusts, are characterized 2/yr, including TCLP. It appears that the unlined surface impoundment system (NPDES treatment ponds Nos. 5, 6, 6A may have been receiving wastewaters with pH less than 2 s.u. (Refer to narrative report)

2. Are any wastes generated at the facility identified by the generator as being excluded from regulation under Rule 3745-51-04? Y ____

If so, specify those waste streams identified by the generator as being excluded under 3745-51-04:

mining exclusion (Bevill) wastes:

- BOF slag
- BOF ESP dust
- Blast furnace slag
- Blast furnace sludge (WWTP)
- Blast furnace, casthouse baghouse dust

3. Is the facility generating any wastes which are identified as <u>recyclable materials</u> as defined in OAC 3745-51-06(A)? Y ____

If so, please identify these waste streams below:

K062

4. In accordance with OAC rule 3745-51-02(E), is the generator recycling any materials on-site by:

   a. Using or reusing the material as an ingredient in an industrial process to make a product? Y
      i. If so, is the material being reclaimed before it is used or reused? Y
   b. Using the material as a substitute for commercial products? N
   c. Returning the material to the original process from which it was generated as a substitute for a raw material feedstock? Y
      i. If so, is the material reclaimed before returning to the original process? ____

NOTE: The materials identified in Question #4 may not be considered wastes if recycled as described above, unless the conditions identified in Questions 4(a)(i) or 4(c)(i) are true. See O.A.C. Rule 3745-51-02(E).

Please identify those materials that the generator is recycling as described in 4.a., 4.b. and/or 4.c. below:

5. Has the generator identified any waste treatment activity as being excluded from regulation because of totally enclosed treatment or via operation of an elementary neutralization unit and/or wastewater treatment unit as described in Rule 3745-65-01? N

If so, specify those waste treatment activities which the generator has identified as being excluded from regulation:

GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)

6. Prior to treating, storing, disposing, transporting or offering to transport hazardous waste, has the generator obtained a generator identification number from US EPA or Ohio EPA as required by 3745-52-12? Y

GENERATOR ANNUAL REPORT (OAC 3745-52-41)

7. Has the generator filed annual reports to the Director on or before March 1st of each calendar year as required by 3745-52-41? Y

HAZARDOUS WASTE IMPORT/EXPORT (OAC 3745-52-50 TO 3745-52-57 AND OAC 3745-52-60)

	Y/N/NA	RMK #
8. Does the generator import or export hazardous waste?	N	
If so, are the wastes handled in accordance with the requirements of 3745-52-50 through 3745-52-57 and 3745-52-60?	N/A	

REMARKS - HAZARDOUS WASTE IMPORT/EXPORT

PRE-TRANSPORT REQUIREMENTS (OAC 3745-52-30 TO 3745-52-33)

9. Does the generator meet the following pre-transport requirements prior to offering hazardous wastes for transport off-site:		
a. The waste material is packaged, labeled, and marked in accordance with the applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32(A)]?	Y	
b. Each container with a capacity of 110 gallons or less is affixed with a completed hazardous waste label as required by 3745-52-32(B)?	Y	
c. Before transporting hazardous wastes off-site or offering hazardous wastes for transportation off-site, does the generator placard <u>or</u> offer the appropriate DOT placards to the initial transporter in compliance with 3745-52-33?	Y	

REMARKS - PRETRANSPORT REQUIREMENTS

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?" [3745-52-34(A)(3)] — Y ____

   b. The date that accumulation began is clearly marked on each container? [3745-52-34(A)(2)] — ____ (2)

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 **Tank System Requirements** checklist to document compliance with these requirements.

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

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

REMARKS - GENERATOR ACCUMULATION REQUIREMENTS

(2) all less than 90 day accumulation tanks (galvanizing line SPL sump; terne line SPL sump; No 5 SPL tanks, silicon settling tanks) are cleaned out, inspected every 90 days.

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, USEPA 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? N/A

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)] N/A

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

GENERATOR CLOSURE REQUIREMENTS (3745-52-34) Y/N/NA RMK #

1. Has the generator closed any < 90-day accumulation unit(s) since date of last inspection? N

   If so, describe the unit(s) which the generator has closed:

2. If the generator has closed any < 90-day accumulation unit(s) as described in Question #1, was closure completed to meet the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] N/A

   Please provide a description of the type of documentation provided by the generator to confirm that closure was completed in accordance with the closure performance standard:

3. If the < 90 day unit closed was a tank system, did the generator also complete closure in accordance with the tank system closure requirements of 3745-66-97(A) and (B)? [3745-52-34(A)(1)] N/A

REMARKS - GENERATOR CLOSURE 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)]	Y	
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

RCRA HAZARDOUS WASTE FACILITY
COMPLIANCE EVALUATION INSPECTION CHECKLIST

Facility: _____

USEPA I.D.: _____ HWFB No.: _____

Street: _____

City: _____ State: _____ Zip: _____

County: _____ Telphone: _____

Fax No: _____ PUCO No.: _____

Owner/Operator: _____

Street: _____

City: _____ State: _____ Zip: _____

Telephone: _____ Fax: _____

Inspection Date: ____/____/____ Time: _____-_____

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

	Name	Agency/Title	Phone
Inspectors:			
Facility Representative:			

STATUS

Cond. Ex. SQG___ SQG___ Large Quantity Generator X
Treatment___ Storage X Disposal___ Transporter___

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

ACTIVITIES

Containers___
Tanks X
Wastepile___
Landfill___
Surface Impoundment___

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

REMARKS - GENERAL INFORMATION

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

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?	Y	
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?	N	
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)?	N/A	

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 B 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)]	N/A	
i. What was the date of notification? _____		

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS

	Y/N/NA	RMK #
IDENTIFICATION NUMBER (OAC 3745-65-11)		
1. Has the facility owner/operator received an identification number from Ohio EPA (or U.S. 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)?	Y	
4. Is the waste analysis repeated when a process or operation generating hazardous waste changes? [3745-65-13(A)(3)(a)]	Y	
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)]	Y	
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)]

WASTE ANALYSIS PLAN - LDR REQUIREMENTS

NOTE: The following requirements identified in Question #7 applies 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?

      ii. The estimated (or actual) weight, volume or density of the waste?

      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?

   c. The present physical location of each hazardous waste within the facility and cross references to specific manifest document numbers?

   d. Records of incidents which required implementation of the contingency plan?

   e. Records of any waste analyses and trial tests required to be performed?

   f. Records of the inspections required by the general inspection requirements under 3745-65-15?

   g. Records of any monitoring, or analytical data required under other subparts as referenced by 3745-65-73(B)(6)?

   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

☆ INFORMATION MAINTAINED IN MULL VARIOUS LOCATIONS

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)]

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

   b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) noted in writing on the manifest document? N/A

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/A

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/A

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)]	Y	
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,	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)]	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;	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	[illegible] check

REMARKS - SECURITY 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?	____	____
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)?	____	____
3. Does the facility provide an annual training program refresher course as required by 3745-65-16(B)?	____	____
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?	____	____

REMARKS - PERSONNEL TRAINING

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]	____	____
2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection?	____	____
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?	____	____
b. Access to telephone, radio or other device for summoning emergency assistance?	____	____
c. Portable fire control equipment, spill control and decontamination equipment?	____	____
d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	____	____
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)]	____	____
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?	____	____
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]	____	____
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]	____	____
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/N/NA RMK #

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

REMARKS - CONTINGENCY PLAN/PREPAREDNESS AND PREVENTION 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] Y

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

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

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] (3)

   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] Y

(3) inspected monthly, not tested according to UCI Steel

	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/A	

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: N/A

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

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

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

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

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

4. Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74]

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?

   b. Name of inspector?

   c. Notation of observations made during the inspection?

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

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

   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)]

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)]

SATELLITE ACCUMULATION AREA REQUIREMENTS
(OAC 3745-52-34(C))

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

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

N/A

SMALL QUANTITY GENERATOR (SQG) REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11) Y/N/NA RMK #

1. Have the wastes generated at the facility been evaluated as required under 3745-52-11? _____ _____

   (a) Has the generator's evaluation identified in Question #1 included an evaluation for the (TC) Toxicity Characteristics identified in 3745-51-24? [3745-52-11(C)] _____ _____

NOTE: The TC Rule requirement noted above must include an evaluation of the metal as well as organic TC constituents identified in 3745-51-24.

If not, please specify those waste(s) which the SQG has failed to provide an adequate evaluation of:

GENERATOR CLASSIFICATION

2. Do quantities of hazardous waste accumulated on-site exceed 6000 kgs? (If so, TSD standards apply. Complete applicable TSD checklists.) [3745-52-34(D) and (F)] _____ _____

GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)

3. Has the generator obtained an identification number from either U.S. EPA or Ohio EPA as required under 3745-52-12 prior to treating, storing, disposing, transporting or offering hazardous waste for transport? _____ _____

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)

4. Are waste streams generated at the facility being reclaimed under a contractual agreement as defined in OAC 3745-52-20(F)? _____ _____

   If not, the generator is subject to manifest requirements of OAC 3745-52-20 through 3745-52-23. Please complete the <u>Manifest Requirements</u> checklist to document compliance with these requirements.

N/A

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

5. Is an emergency coordinator available at all times? [3745-52-34(D)(5)(a)] _____ _____

6. Has the following information been posted by the telephone? [3745-52-34(D)(5)(b)]:

   a. Name and telephone number of emergency coordinator? _____ _____

   b. Location of fire and spill control equipment? _____ _____

   c. Telephone number of local fire department? _____ _____

7. Have emergencies been reported to the National Response Center? [3745-52-34(D)(5)(d)] _____ _____

8. Are all employees thoroughly familiar with proper handling and emergency procedures? [3745-52-34(D)(5)(c)] _____ _____

In addition to the above, the small quantity generator must comply with the "Preparedness and Prevention" requirements of OAC 3745-65-30 through 3745-65-37. Please complete the Preparedness and Prevention checklist to document compliance with these requirements.

SQG - ACCUMULATION OF HAZARDOUS WASTES (OAC 3745-52-34)

9. Is the generator accumulating hazardous wastes in containers? If so, _____ _____

   a. Is the date accumulation began clearly marked on each container [3745-52-34(A)(2)]? _____ _____

   b. Is each container clearly marked with the words "Hazardous Waste" [3745-52-34(A)(3)]? _____ _____

In addition to the above, if the generator is accumulating hazardous waste in containers, please complete the Management of Containers checklist. If the Small Quantity Generator is operating a satellite accumulation area, the Satellite Accumulation Area Requirements portion of the checklist must also be completed.

10. Is the generator accumulating hazardous wastes in tanks? _____ _____

    a. If so, is each tank clearly marked with the words "Hazardous Waste" [3745-52-34(A)(3)]? _____ _____

In addition to the above, if the generator is accumulating hazardous waste(s) in tanks, please complete the Accumulation in Tanks for SQG's checklist.

N/A

	Y/N/NA	RMK #
11. Has the generator accumulated hazardous wastes in excess of 180 days (or 270 days if the waste must be transported more than 200 miles)? [3745-52-34(E)]	_____	_____
a. If so, has the generator been granted an extension by the Director for accumulation in excess of 180 (or 270) days?	_____	_____

REMARKS - SMALL QUANTITY GENERATOR REQUIREMENTS

N/A

ACCUMULATION IN TANKS FOR SMALL QUANTITY GENERATORS
(BETWEEN 100 AND 1000 KG/MO)

Applicability: All of the items on this checklist apply to small quantity generators who accumulate hazardous waste in tanks for less than 180 days (or 270 days if hazardous waste must be shipped greater than 200 miles) and do not accumulate over six thousand kg on-site at any time.

TANK SYSTEM OPERATING REQUIREMENTS (OAC 3745-66-992(B))	Y/N/NA	RMK #
1. Does the small quantity generator comply with the following operating requirements of OAC 3745-66-992(B):		
a. Does the treatment or storage of hazardous waste in the tank comply with 3745-65-17(B)?	____	____
b. Does the generator ensure that wastes or treatment reagents are not placed in a tank if they could cause the tank or its inner liner to rupture, leak, corrode or fail before its intended life?	____	____
c. Are uncovered tanks operated with 2 feet of freeboard?	____	____
i. If not, is the tank equipped with a containment structure, drainage control system, or diversion structure with a capacity that equals or exceeds the volume of the top 2 feet of the tank?	____	____
d. If waste is continuously added, is the tank equipped with a waste feed cut-off or bypass system?	____	____

TANK SYSTEM INSPECTIONS (OAC 3745-66-992(C))		
2. Is the generator inspecting the following components of the tank system: [3745-66-992(C)]		
a. Discharge control equipment (daily)?	____	____
b. The data from monitoring equipment (daily)?	____	____
c. The level of the waste in the tank (daily)?	____	____
d. The construction material (weekly)?	____	____
e. The area surrounding the tank (weekly)?	____	____

N/A

SQG - TANK SYSTEM CLOSURE REQUIREMENTS
(OAC 3745-66-992(D))

Y/N/NA RMK #

3. Has the small quantity generator, upon closure of the tank, removed all hazardous waste from the tank system in compliance with OAC 3745-66-992(D)? _____ _____

SPECIAL REQUIREMENTS - IGNITABLE AND INCOMPATIBLE WASTES (OAC 3745-66-992(E))

4. Has the SQG complied with either of the two following requirements of OAC 3745-66-992(E):

   a. Are ignitable or reactive wastes treated before or immediately after placement in the tank to render either non-reactive or not ignitable? _____ _____

      i. Has this treatment activity been conducted in compliance with 3745-65-17(B)? _____ _____

      OR;

   b. Are ignitable and/or reactive wastes stored or treated in a manner which protects the waste from conditions that may cause ignition or reaction? _____ _____

NOTE: In accordance with Ohio's hazardous waste rules, generators (including small quantity generators) cannot treat hazardous wastes in containers or tanks without obtaining a permit.

5. Is the generator complying with the N.F.P.A.C.L. CODE (1977 or 1981) buffer zone requirements? _____ _____

6. Are incompatible wastes placed in the same tank? _____ _____

   a. If so, has the SQG complied with OAC 3745-65-17(B)? [3745-66-992(F)] _____ _____

7. Are incompatible wastes placed in an unwashed tank? _____ _____

   a. If so, has the SQG complied with OAC 3745-65-17(B)? [3745-66-992(F)] _____ _____

REMARKS - SQG TANK SYSTEM ACCUMULATION REQUIREMENTS

OAC CHAPTER 3745-59 - LDR GENERAL REQUIREMENTS

CASE-BY-CASE EXTENSIONS

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

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	RMKS
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,	Y	
(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)?	Y	
(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)]	Y	D002 D006 ?

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	RMKS
5. Does the generator treat characteristic hazardous waste(s) in a RCRA-exempt unit to render such wastes non-hazardous?	____	☆ ____
(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

☆ CWT - neutralization
check with 5 & 6 ponds

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)]	Y	
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)]	Y	
(b) Appropriate treatment standard for the waste? [O.A.C. Rule 3745-59-07(A)(1)(b); 40 CFR 268.7(a)(1)(ii)]	Y	
(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)]	Y	
(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(1)(d); 40 CFR 268.7(a)(1)(iv)]	Y	
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)]	Y	
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)]	N/A	
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)]		
(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)]		
(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)]		
(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)]		
(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)]		

	Y/N/NA	RMKS
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/A	
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	RMKS
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)]		

OFF-SITE SHIPMENTS - NOTIFICATION/CERTIFICATION REQS. | Y/N/NA | RMKS

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,

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,		
(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?		
(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	RMKS
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	RMKS
	N/A	
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:	____	____
(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	RMKS
(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)]	_____	_____

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) The identification of the contents?	N/A	
	(b) The date which accumulation began?	N/A	
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)):	Y	
	(a) A description of its contents?	Y	
	(b) The quantity of each hazardous waste received?		A operat - record, kept
	(c) The date each period of accumulation begins? or;		1
	(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)]	Y	
3.	Are land disposal restricted wastes being stored at the facility for greater than one year? If so,	N	
	(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)]	N/A	

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) 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)]	N/A	

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

SPECIAL REQUIREMENTS FOR IGNITABLE/REACTIVE/INCOMPATIBLE WASTES (OAC 3745-65-17)	Y/N/NA	RMK #

NOTE: The following requirements are generally applicable to TSD facilities only. See OAC Rule 3745-66-992(F)(2) for applicability of ignitable/reactive/incompatible waste requirements for SQGs accumulating hazardous waste in tanks.

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?	Y	
b. Physical separation of incompatible waste materials?	Y	
c. "No Smoking" or "No Open Flames" signs are placed near areas where ignitable or reactive wastes are handled?	Y	Reference
d. Commingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B)?	Y	

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?	N/A	
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?	
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)]	N/A	
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 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] N/A

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] N/A

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? N/A

b. Land use is restricted under closure and post-closure rules? [3745-66-19]

REMARKS - CLOSURE/POST CLOSURE REQUIREMENTS

TANK SYSTEM REQUIREMENTS (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 accumulate wastes in tanks for less than 90 days, 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,	Y	
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)]	Y	
b. **Existing tank system(s)** used to manage: F020, F021, F022, F023, F026 or F027 hazardous wastes? If so,	N/A	
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)]	N/A	
c. **Existing tank system(s)** of known, documentable age?	Y	

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

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)] — N/A

Y/N/NA RMK #

d. **Existing tank system(s)** for which the age cannot be documented? If so, N/A

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/A

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)] N/A

3. **IF THE O/O HAS NOT PROVIDED SECONDARY CONTAINMENT FOR THE TANK SYSTEM(S):** Has the owner/operator obtained a variance from secondary containment requirements of 3745-66-93 from the Director in accordance with 3745-66-93(G)(1)? NA

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. <u>External Liner</u>? If so, _____ _____

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

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

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

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

      5. Are chemically resistant water stops in place at all joints? [3745-66-93(E)(1)(e)] _____ _____

      6. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? [3745-66-93(E)(1)(f)] _____ _____

   b. <u>Vault System</u>? If so,

      1. Is the vault system designed to contain 100% of the capacity of the largest tank within its boundary? [3745-66-93(E)(2)(a)] Y _____

      2. Is the vault system designed and operated to prevent run-off and infiltration into the vault system, <u>or</u> the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm? [3745-66-93(E)(2)(b)] Y _____

      3. Are chemically resistant water stops in place at all joints? [3745-66-93(E)(2)(c)] Y _____

	Y/N/NA	RMK #
4. Is there a compatible interior coating to prevent migration into the concrete? [3745-66-93(E)(2)(d)]	Y	
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(E)(2)(e)]	N/A	
6. Is the vault system provided with an exterior moisture barrier? [3745-66-93(E)(2)(f)]	N/A	
c. <u>Doubled-Walled Tank</u>? If so,		
1. Is the doubled-walled tank designed as an integral structure to contain any release from the inner tank? [3745-66-93(E)(3)(a)]	N/A	
2. **If metal**, are the primary tank interior and outer shell exterior surfaces protected from corrosion? [3745-66-93(E)(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(E)(3)(c)]		
5. Is the secondary containment system for the tank(s) an <u>equivalent device</u> as described in 3745-66-93(D)(4) which has been approved by the Director? [3745-66-93(D)(E)]	N/A	

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)]	Y	LEAK DETECTION [illegible]
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)]	Y	
b. Is it placed on a foundation or base capable of providing support? [3745-66-93(C)(2)]	Y	
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)]	Y	
d. Is it sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? [3745-66-93(C)(4)]	Y	
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)]	Y	

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)]	Y/N	*
9. If the answer to #8 is **NO**, is ancillary equipment:		
a. Inspected daily? **AND;**	~~NA~~ Y	*
b. Is ancillary equipment one of the following;		
i. Above ground piping (exclusive of flanges, joints, valves and conntections)?	Y	
ii. Welded flanges, welded joints and/or welded connections?	N/A	
iii. Sealless or magnetic coupling pumps and/or sealless valves?	N/A	
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)?	Y ~~N/A~~	

REMARKS - ANCILLARY EQUIPMENT REQUIREMENTS

underground pipe inside pipe inside trench
@ MH gap of secondary containment

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)]	Y	
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)]	Y	
b. Does the assessment include consideration of the design standards of the system? [3745-66-92(A)(1)]	Y	
c. Does the assessment include consideration of the hazardous characteristics of the waste(s) to be handled? [3745-66-92(A)(2)]	Y	
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? [3745-66-92(A)(3)]	N/A	
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? [3745-66-92(A)(4)]	Y	
f. Does the assessment include design considerations to ensure that the tank foundations will maintain the load of a full tank? [3745-66-92(A)(5)(a)]	Y	
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? [3745-66-92(A)(5)(b)]	N/A	
h. Does the assessment include design considerations to ensure that the tank system will withstand the effects of frost heave? [3745-66-92(A)(5)(c)]	Y	

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)]	Y	
IN ACCORDANCE WITH OAC 3745-66-92(G), do the written statements address all of the following:		
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)] N/A

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

   b. The characteristics of hazardous waste(s) that have have 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 <u>other than</u> 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)] _____ _____

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 (OAC 3745-66-94)

	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)]	Y	
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(B)]	Y	
c. If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96? [3745-66-94(C)]		

TANK SYSTEM - INSPECTION REQUIREMENTS (OAC 3745-66-95)

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)]	Y	
b. Above ground portion of tank (daily)? [3745-66-95(A)(2)]	Y	
c. Data from leak detection equipment (daily)? [3745-66-95(A)(3)]		usuals
d. Construction materials and area immediately surrounding the tank for signs of erosion or release of hazardous waste (daily)? [3745-66-95(A)(4)]	Y	
e. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(B)(1)]	N/A	
f. Where applicable, all sources of impressed current at least bi-monthly? [3745-66-95(B)(2)]	N/A	

REMARKS - TANK SYSTEM GENERAL OPERATING AND INSPECTION REQUIREMENTS

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES
(OAC 3745-66-98 AND 3745-66-99)

Y/N/NA RMK #

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)] N/A

   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? [3745-66-98(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)] N/A

   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)]

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 there been a leak or spill from any tank system or has any tank system been found unfit for use?	____	☆ ____
If so, did the owner/operator:		
a. Immediately cease 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 conduct 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. Submit a written report of the incident to the Director within 30 days of the release? [3745-66-96(D)(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.

☆ RA TANK SPILL

	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)]	_____	_____
i. 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)]	_____	_____
i. If soils cannot be removed, has the tank been closed? [3745-66-93(G)(3)]	_____	_____
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)]	_____	_____

REMARKS - TANK SYSTEMS FOUND LEAKING OR UNFIT FOR USE

OAC 3745-67 SURFACE IMPOUNDMENTS

	Y/N/NA	RMK #
1. Is at least 2 feet (60 cm) of freeboard maintained in the surface impoundment, or has written certification that the impoundment is of adequate design been prepared? [3745-67-22]	____	____
2. Are earthen structural containment systems equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water? [3745-67-23]	____	____
3. Is the level of freeboard in the surface impoundment inspected at least once each operating day? [3745-67-26(A)]	____	____
4. Is the structural containment system inspected at least once per week? [3745-67-26(B)]	____	____
5. Are the inspections noted in Question 4 and 5 documented? [3745-65-15(B)(4)]	____	____
MANAGEMENT OF IGNITABLE/REACTIVE WASTE IN SURFACE IMPOUNDMENTS		
6. Whenever a surface impoundment is used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the surface impoundment, has the facility insured the safety of such changes by: [3745-67-25]		
a. Waste analyses and trial treatment? or;	____	____
b. Written documented information on similar treatment of similar waste under similar conditions?	____	____
7. With the exception of emergency situations, whenever ignitable or reactive wastes are placed in a surface impoundment, has the facility insured the safety of the operation by complying with the following: [3745-67-29 and 3745-65-17]		
a. The waste is immediately treated after placement in the surface impoundment so that it is no longer hazardous?	____	____
b. The waste is managed to protect from ignition?	____	____
c. A certification from a qualified chemist or engineer is maintained at the facility stating that the design/operation of the unit will prevent ignition or reaction?	____	____

	Y/N/NA	RMK #
8. Is the placement of incompatible waste materials in the same surface impoundment done in compliance with the safety requirements of 3745-65-17? [3745-67-30]	_____	_____
9. At closure, were all standing liquids, waste residues, liners, and contaminated soil removed from the unit? [3745-67-28]	_____	_____
10. Has the owner/operator retrofitted the surface impoundment or ceased receipt of hazardous waste by November 8, 1988?	_____	_____
If no, did USEPA grant an exemption prior to that date?	_____	_____

NOTE: If the operator elects not to exempt the surface impoundment from further regulation by removing all waste materials, the surface impoundment is subject to the post-closure care and ground water monitoring requirements specified in 3745-68-10 and 3745-67-28(C).

REMARKS - SURFACE IMPOUNDMENT REQUIREMENTS

OAC 3745-67 TREATMENT OR STORAGE IN WASTE PILES

N/A

	Y/N/NA	RMK #
1. Are waste materials subject to dispersal by wind adequately protected against such dispersal? [3745-67-51]	____	____
2. If leachate or run-off from a waste pile is a hazardous waste, have the following steps been taken to prevent or properly manage the run-off: [3745-67-53]		
a. The pile has been placed on an impermeable base that is compatible with the waste under conditions of treatment or storage? and;	____	____
b. A run-on control system capable of handling a 24 hr, 25-yr storm has been implemented? and;	____	____
c. A run-off management system capable of controlling a 24 hr, 25-yr storm has been implemented? and;	____	____
d. Facilities associated with run-on and run-off control systems are managed to maintain design capacity after a rain event?	____	____
OR;		
e. The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff? and;	____	____
f. No liquids or wastes containing free liquids are placed in the pile?	____	____
3. Before new waste materials are added to an existing waste pile, is it first ascertained that the material is compatible with the existing waste through appropriate laboratory testing? [3745-67-52]	____	____
a. Are the results of the analysis maintained in the facility's operating record as required by 3745-65-13? [3745-67-52]	____	____
4. Before ignitable or reactive wastes are placed in waste piles are one or both of the following met: [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 the activity was conducted in compliance with the safety requirements of 3745-65-17?	____	____

	Y/N/NA	RMK #
b. The ignitable or reactive material is physically or otherwise protected from conditions which may cause ignition or reaction?	_____	_____
5. Is the waste pile separated or protected from any incompatible materials which may be stored nearby? [3745-67-57(B)]	_____	_____
6. 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]

REMARKS - WASTE PILE REQUIREMENTS

OAC 3745-67 LAND TREATMENT

N/A

	Y/N/NA	RMK #
1. Is the hazardous waste which is being managed by land treatment, made less hazardous or nonhazardous by degradation, transformation or immobilization occurring in the soil? [3745-67-72(A)]	____	____
2. Are run-off and run-on management systems capable of controlling a 24 hr, 25-yr rain event? [3745-67-72(B)(C)]	____	____
a. If run-off is hazardous waste, is it managed in accordance with applicable rules? [3745-67-72(B)]	____	____
b. Are the facilities associated with run-on and run-off systems managed to maintain design capacity after rain events? [3745-67-72(D)]	____	____
c. If the unit is subject to wind dispersal, is it managed to control the dispersal? [3745-67-72(E)]	____	____
3. Has the owner/operator determined the following information about the waste being land treated: [3745-67-73(A)(B)(C)]		
a. Levels of EP toxic contaminants exceeding the maximum concentrations in Table I of 3745-51-24?	____	____
b. For wastes listed in 3745-51, the concentrations of constituents causing the waste to be listed?	____	____
c. If food chain crops are grown, the concentrations of arsenic, cadmium, lead and mercury in the waste?	____	____
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 3745-67-76?	____	____
5. Has an unsaturated zone monitoring plan been written, designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste? [3745-67-78]	____	____
a. Is the plan kept at the facility along with the rationale used to develop it? [3745-67-78(D)]	____	____

	Y/N/NA	RMK #
6. Does the unsaturated zone monitoring plan specify the following minimum information: [3745-67-78]	____	____
a. Soil monitoring with soil cores?	____	____
b. Soil pore monitoring?	____	____
c. The depth of sampling relative to depth of waste incorporation. (Sampling is below depth of waste)?	____	____
d. Number of soil and soil-pore water samples to be taken?	____	____
e. Are soil and soil pore water samples analyzed for the hazardous waste constituents that were found in the waste?	____	____
7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility? [3745-67-79]	____	____
8. Are ignitable or reactive wastes immediately incorporated into the soil so that they are rendered non-hazardous? [3745-67-81]	____	____
9. Are incompatible wastes land treated? (If yes, 3745-65-17 applies)	____	____
10. A written closure and post-closure plan is on file at the facility which describes all activities and addresses all of the plan elements required by 3745-66-12, 3745-66-18, and 3745-67-80?	____	____
11. Has the closure/post-closure plan been amended 60 days prior to any changes in facility design, or operation, no later than 60 days after an expected event has occurred which has effected the closure plan? [3745-66-12(C), and 3745-66-18(D)]	____	____
12. Has the closure/post-closure plan been submitted to the Director 180 days prior to beginning closure? [3745-66-12(D), and 3745-66-18(E)]	____	____
13. Has the property owner attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under 3745-66-17(C) as required in 3745-66-20?	____	____

OAC 3745-68 LANDFILLS

N/A

GENERAL OPERATING REQUIREMENTS

Y/N/NA RMK #

1. Does the facility provide the following:

   a. Run-on control capable of handling a 24-hr, 25-yr storm? [3745-68-02(A)] ____ ____

   b. Run-off control capable of handling a 24-hr, 25-yr storm? [3745-68-02(B)] ____ ____

   c. If run-off is hazardous waste, is it managed in accordance with applicable rules? [3745-68-02(B)] ____ ____

   d. Are facilities associated with run-on and run-off control systems managed to maintain design capacity after rain events? [3745-68-02(C)] ____ ____

   e. Control of wind dispersal of hazardous waste? [3745-68-02(D)] ____ ____

REMARKS - LANDFILL GENERAL OPERATING REQUIREMENTS

SURVEYING AND RECORDKEEPING REQUIREMENTS

2. Does the operating record include the following information as required by OAC 3745-68-09:

   a. A map showing the exact location and dimensions of each cell? [3745-68-09(A)] ____ ____

   b. The contents of each cell and the location of each hazardous waste type within each cell? [3745-68-09(B)] ____ ____

	Y/N/NA	RMK #
3. Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? [3745-68-12]	_____	_____

NOTE: If waste is rendered non-reactive or non-ignitable, see treatment requirements. If not, the provisions of 3745-65-17 and 3745-68-12(b) apply.

4. Does the owner/operator dispose of incompatible wastes in separate cells? [3745-68-13] If not, the provisions of 3745-68-15 apply.	_____	_____
5. Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? [3745-68-15]	_____	_____
6. Are containers at least 90% full prior to placement in the landfill?	_____	_____
7. Is bulk or non-containerized liquid waste or waste containing free liquids treated so that free liquids are no longer present? [3745-68-14(A)]	_____	_____
8. Are containers other than lab packs, ampules, batteries or capacitors holding free liquids placed in the landfill? [3745-68-14(B)]	_____	_____
a. If yes, has all free liquid been removed, absorbed or otherwise eliminated?	_____	_____
9. Has the owner/operator employed Method 9095 (Paint Filter Liquids Test) to demonstrate the absence of free liquids in containerized or bulk waste? [3745-68-14(D)]	_____	_____
10. Are the special requirements for lab pack waste met? [3745-68-16]	_____	_____

REMARKS - SURVEYING AND RECORDKEEPING REQUIREMENTS

LANDFILL CLOSURE AND POST CLOSURE REQUIREMENTS	Y/N/NA	RMK #
11. Is a written closure/post-closure plan available for inspection at the facility? [3745-66-12]	____	____
12. Has the closure/post-closure plan been amended 60 days prior to any changes in facility design, or operation, or no later than 60 days after an unexpected event has occurred which has effected the closure plan? [3745-66-18(D)]	____	____
13. Has the closure/post-closure plan been submitted to the Director 180 days prior to beginning closure? [3745-66-18(E)]	____	____
14. Does the plan contain information required in 3745-68-10?	____	____
15. Is a closure cost estimate available?	____	____
16. Has closure begun?	____	____
17. Has the property owner attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under 3745-66-17(C) as required in 3745-66-19?	____	____

REMARKS - LANDFILL CLOSURE/POST-CLOSURE REQUIREMENTS

OAC 3745-68 INCINERATION AND THERMAL TREATMENT

N/A

Y/N/NA RMK #

1. Before adding hazardous waste, is the unit brought to steady state utilizing an auxiliary fuel? [3745-68-73 or 3745-68-45] _____ _____

   a. List type of auxilliary fuel used:

   _____

   b. Is the process a batch thermal treatment process?

   _____

   c. Is the unit a boiler, industrial furnace, thermal treatment unit, or incinerator?

   _____

   d. Does the unit burn waste which is hazardous solely due to ignitability, reactivity, or combustibility? _____ _____

WASTE ANALYSIS REQUIREMENTS

NOTE: In addition to analyses required under 3745-65-13, the following are minimum requirements for wastes not previously burned/treated [3745-68-41 and 3745-68-75]

2. Is the operator conducting an analysis of any waste which has not been previously burned in the incinerator as required by 3745-68-41? _____ _____

   If so, does the analysis include a determination of the following:

   a. Heating value of the waste? [3745-68-41(A)] _____ _____

   b. Halogen content of the waste? [3745-68-41(B)] _____ _____

   c. Sulfur content of the waste? [3745-68-41(B)] _____ _____

   d. Concentrations of lead and mercury in the waste? [3745-68-41(C)] _____ _____

      i. If the o/o does not have lead and mercury analysis, is written documentation available to show that these elements are absent from the waste? [3745-68-41(C)] _____ _____

Y/N/NA RMK #

e. List other parameters for which the waste is tested to enable the owner/operator to establish steady state or determine the types of pollutants which may be emitted. (Note in remarks any which should be tested.)

_____
_____
_____
_____
_____

3. Are steady state conditions established prior to feeding hazardous waste(s) into the unit for incineration? [3745-68-45 and 3745-68-73] _____ _____

MONITORING AND INSPECTIONS

4. Is the operator meeting the following monitoring and inspection requirements: [3745-68-47 and 3745-68-77]

a. Are combustion/emission control instruments monitored at least every 15 minutes? [3745-68-47(A), 68-77(A)] _____ _____

b. Is steady state maintained or correction attempted? 3745-68-77(B) _____ _____

c. FOR THERMAL TREATMENT ONLY

i. Is stack plume observed at least hourly for normal color and opacity? [3745-68-77(B)] _____ _____

ii. Have these stack plume observations ever shown a plume differet than normal? _____ _____

iii. If yes to (2) above, were corrections made to return emissions to normal appearance? [3745-68-77(B)] _____ _____

d. Are daily inspections conducted of the unit and all associated equipment to ensure proper operation? [3745-68-77(C)] _____ _____

e. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions? [3745-68-77(C)] _____ _____

f. Are emergency shutdown controls and system alarms checked daily for proper operation? [3745-68-77(C)] _____ _____

	Y/N/NA	RMK #
5. At closure, have all hazardous wastes and residues been removed? [3745-68-51 and 3745-68-81]	_____	_____
6. Does the owner/operator burn hazardous wastes F020, F021, F023, F026 or F027?		
a. If yes, has the unit been certified by the Director [3745-68-52 and 3745-68-83]	_____	_____
7. Does the facility open burn or detonate waste explosives within the isolation distances specified in 3745-68-82?	_____	_____

REMARKS - INCINERATION/THERMAL TREATMENT REQUIREMENTS

N/A

OAC 3745-53 HAZARDOUS WASTE TRANSPORTER REQUIREMENTS

REGISTRATION AND IDENTIFICATION REQUIREMENTS (OAC 3745-53-11)	Y/N/NA	RMK #
1. Has the entity registered with the Public Utilities Commission of Ohio as a transporter of hazardous waste? [3745-53-11]	____	____
What is the entity's PUCO Number? _____		
2. Has the transporter received a U.S. EPA ID number prior to transporting hazardous waste? [3745-53-11(D)]	____	____
3. Have all wastes accepted for transport by the transporter been accompanied by a manifest prepared by the generator in accordance with 3745-52? [3745-53-20(C)]	____	____
4. Has the transporter signed the manifest as required by 3745-53-20 and carried the manifest with the waste shipment as required by 3745-53-20(C)?	____	____
5. Upon delivery of the hazardous waste to the next transporter or the designated facility, has the transporter signed the manifest as required by 3745-53-20(D)(1) and retained a signed copy for at least 3 years? [3745-53-22(A)]	____	____
6. Has the transporter delivered the entire quantity of waste accepted from the generator in accordance with manifest instructions?	____	____
a. In cases where this was not possible, has the transporter contacted the generator for further instructions and revised the manifest accordingly? [3745-53-21(A)(B)]	____	____
7. If hazardous waste has been delivered to rail or water transporters, has the original transporter complied with the manifest handling requirements of 3745-53-20(E)(F)?	____	____
8. If hazardous waste has been shipped out of the country, has the transporter retained signed copies of the manifest for at least 3 years indicating that the waste left the U.S.A.? [3745-53-22(D)]	____	____

what about Terne line transport to Aegen Sump #6

	Y/N/NA	RMK #
9. Has the transporter ever had a discharge of hazardous waste during the time that the waste was under his control? If so,		
a. Was immediate action taken? [3745-53-30(A)]		
b. Were all of the notifications made as required by 3745-53-30(C)?		
c. Was the discharge cleaned up as required by 3745-53-31?		
10. Does the transporter store hazardous wastes temporarily while wastes are in transit? If so, are the following requirements met: [3745-53-12]		
a. Are wastes stored for only 10 days or less?		
b. Do wastes remain properly DOT packaged during storage?		

NOTE: Temporary storage in stationary tanks is not permitted under transfer facility requirements and such storage requires a RCRA permit and is subject to interim status requirements for storage facilities. Any type of storage by the transporter which is not specifically authorized under OAC 3745-53-12 transfer facility requirements is subject to full RCRA regulation.

11. Does the transporter import hazardous waste into the United States?		
12. Does the transporter mix hazardous wastes of different US DOT descriptions by placing them into a single container?		

NOTE: A transporter that imports hazardous wastes or mixes wastes as defined in 3745-53-10(c) becomes a generator and is subject to the requirements of 3745-52.

13. Does the transporter receive SQG wastes for transport pursuant to a reclamation agreement?		
If so, was the following information recorded in a log or shipping paper carried with the shipment as required by 3745-53-20(H):		
a. Name, address and USEPA ID # of SQG?		
b. Quantity of waste?		
c. DOT required shipping information?		
d. Date waste accepted?		

Y/N/NA RMK #

14. If the transporter receives SQG wastes for transport as described in Question 13, are records related to the shipments maintained for at least 3 years following expiration of the reclamation agreement? [OAC 3745-53-20(H)(4)]

_____ _____

REMARKS - TRANSPORTER REQUIREMENTS

OAC 3745-58 HAZARDOUS WASTE BURNED FOR ENERGY RECOVERY

N/A

Y/N/NA RMK #

1. Does the facility:

   a. Generate hazardous waste fuel?
      If so, complete Generator Requirements checklist _____ _____
   b. Transport hazardous waste fuel?
      If so, complete Transporter Requirements checklist _____ _____
   c. Market hazardous waste fuel?
      If so, the facility is subject to 3745-58-45 _____ _____
   d. Burn hazardous waste fuel?
      If so, the facility is subject to 3745-58-46 _____ _____

MARKETER AND BURNER REQUIREMENTS (OAC 3745-58-45 AND 3745-58-46)

2. Has the marketer/burner filed a Notification of Hazardous Waste Activity Form with the USEPA? [3745-58-45(B)]; [3745-58-46(B)] _____ _____

3. Is hazardous waste fuel stored in containers or tanks? _____ _____
   If so,

   a. Is the storage for more than 90 days? [3745-58-45(C)] [3745-58-46(C)(D)(E)] _____ _____

   b. If 3.a. is yes, did the marketer/burner file a Part A Application for interim status as a storage facility by May 29, 1986? _____ _____

NOTE: Storage of hazardous waste fuels in containers or tanks is subject to regulation under OAC 3745-52-34 and OAC 3745-65 through 3745-69. Complete applicable checklist(s) for G/TSD/containers/tanks.

MARKETER REQUIREMENTS (OAC 3745-58-45)

4. Have shipments of hazardous waste fuel initiated by the marketer been accompanied by completed manifests? [3745-58-45(D)] _____ _____

5. Has the marketer obtained written notice before initiating the first shipment certifying that recipients of the hazardous waste fuel have notified US EPA of their hazardous waste activity and will burn hazardous waste fuel only in boilers or industrial furnaces? [3745-58-45(E), 3745-58-46(F)] _____ _____

	Y/N/NA	RMK #
6. Has the marketer provided notice to companies from which he will receive hazardous waste fuel that he has notified USEPA of his hazardous waste activity? [3745-58-45(F)]	_____	_____
7. Are copies of the required certifications maintained for 3 years by both the marketer and receiving burner? [3745-58-45(G)]	_____	_____
8. Are other applicable recordkeeping requirements under OAC Chapters 3745-52, 3745-54, and 3745-65 maintained by the marketer?	_____	_____

HAZARDOUS WASTE BURNER REQUIREMENTS (OAC 3745-58-46)

9. Is hazardous waste burned in appropriate devices as defined by 3745-58-42(B)?	_____	_____
10. Did the burner provided a one-time written and signed notice to the marketer certifying that:		
a. the burner has notified USEPA of its waste-as-fuel activities?	_____	_____
b. the burner will burn in a boiler or furnace identified in 3745-58-42(B)?	_____	_____
11. Are copies of required certification maintained for 3 years by both the marketer and receiving burner? [3745-58-46(G)]	_____	_____
12. Are other applicable recordkeeping requirements under OAC 3745-54 through 3745-57; 3745-65 through 3745-69; 3745-56-20 through 3745-56-59 and 3745-67-20 through 3745-67-58 maintained by the marker/burner?	_____	_____

REMARKS - HAZARDOUS WASTE BURNER/MARKETER REQUIREMENTS

OAC 3745-58 USED OIL BURNED FOR ENERGY RECOVERY N/A

	Y/N/NA	RMK #.
1. Is used oil or used oil fuel being burned for energy recovery in a boiler or industrial furnace? [3745-58-50(A)]	____	____
2. Does the used oil contain more than 1000 ppm total halogens?	____	____
If yes, it is regulated as a hazardous waste fuel under 3745-58. [3745-58-50(C)]		
3. Is the used oil a hazardous waste solely because it:		
a. Exhibits a characteristic identified under 3745-51? [3745-58-50(C)]	____	____
b. Contains hazardous waste generated by Conditionally Exempt Small Quantity Generators only? [3745-58-50(D)]	____	____
If either 3.a. or 3.b. is yes, the used oil is regulated as a used oil not a hazardous waste fuel.		
4. Is the used oil classified as "off-specification" due to exceedances of any of the following allowable levels of constituents: [3745-58-50(E)]		

Constituent	Allowable Level		
a. Arsenic	5 ppm maximum	____	____
b. Cadmium	2 ppm maximum	____	____
c. Chromium	10 ppm maximum	____	____
d. Lead	100 ppm maximum	____	____
e. Flash Point	100 degrees F minimum	____	____
f. Total Halogens	4,000 ppm maximum	____	____

5. If the generator/marketer claims that used oil meets or exceeds specification, does the generator/marketer have analyses of used oil documenting that it meets/exceeds specification? [3745-58-53(B)(1)]	____	____
6. If the marketer is handling specification used oil, does he/she maintain an operating log containing the following information: [3745-58-53(B)(7)]		
a. Name and address of facility receiving the shipment?	____	____
b. Date of shipment or delivery?	____	____
c. Cross-reference to the record of used oil analysis?	____	____

	Y/N/NA	RMK #
7. Are used oil analyses and the operating log kept for a minimum of 3 years?	____	____

THE FOLLOWING QUESTIONS APPLY ONLY TO MARKETERS/BURNERS OF OFF-SPECIFICATION USED OIL FUEL:

8. Has the marketer filed a Notification or Re-notification of Hazardous Waste Activity with USEPA? [3745-58-53(B)(3)] and [3745-58-54(B)]	____	____
9. Has the burner of off-specification used oil notified USEPA of his/her used oil management activities (except for oil-fired space heaters described under 3745-58-51(B)(2)(c)? [3745-58-54(B)]	____	____
10. When the marketer initiates shipment of off-specification used oil, has he/she prepared and sent the receiving facility an invoice containing the following information: [3745-58-53(B)(4)]		
a. An invoice number?	____	____
b. The marketer's name, address, and USEPA I.D. No.?	____	____
c. The receiving facility's name, address and USEPA I.D. No.?	____	____
d. The quantity of off-specification used oil delivered?	____	____
e. The date(s) of shipment or delivery?	____	____
f. The statement "This used oil is subject to Ohio EPA regulation under Rules 3745-58-50 to 3745-58-54 of the Ohio Administrative Code?"	____	____
11. Prior to initiating the first shipment of off-specification used oil, has the marketer obtained written notice certifying that recipients have notified USEPA (and if a burner will burn only in industrial furnaces or boilers)? [3745-58-53(B)(5)]	____	____
12. Before accepting shipments of off-specification used oil from other marketers, has the marketer certified that he/she has notified USEPA of the marketing activity? [3745-58-53(B)(5)]	____	____

	Y/N/NA	RMK #
13. Are copies of certifications, invoices and analyses maintained for 3 years? [3745-58-53(B); 3745-58-54(F)]	____	____
14. Has the burner certified to marketers from whom he/she receives off-specification oil that he/she has a USEPA I.D. No. and will only burn the used oil in an industrial furnace or boiler identified in 3745-58-51(B)? [3745-58-54(C)]	____	____

REMARKS - USED OIL BURNER/MARKETER REQUIREMENTS

Under consideration

OAC 3745-58 RECYCLABLE MATERIALS UTILIZED FOR PRECIOUS METALS RECOVERY

N/A

APPLICABILITY Y/N/NA RMK #

1. Does the facility generate, transport or store recyclable materials that are reclaimed to recover economically significant amounts of any one of the following:

   a. Gold ____ ____

   b. Silver ____ ____

   c. Platinum ____ ____

   d. Paladium ____ ____

   e. Irridium ____ ____

   f. Osmium ____ ____

   g. Rhodium ____ ____

   h. Ruthenium ____ ____

   If yes, please complete the appropriate checklist(s) below.

GENERATOR REQUIREMENTS (OAC 3745-58-60)

2. If the facility generates recyclable materials as described in question 1.a through 1.h, has the facility notified U.S. EPA of its generation activities? [3745-58-60(B)(1)]? ____ ____

3. Is the generator shipping the recyclable materials as described in 1.a through 1.h off-site? ____ ____

   If so, the generator is subject to the Manifest Requirements of OAC 3745-52-20 through 3745-52-23. Please complete the <u>Manifest Requirements</u> checklist. [3745-58-60(B)(2)]

TRANSPORTER REQUIREMENTS

4. Does the facility transport any recyclable materials that are reclaimed to recover precious metals as identified in question 1.a through 1.h? ____ ____

   If so, the facility must comply with the Transporter Requirements of OAC 3745-53-20 through 3745-53-23. Please complete the <u>OAC 3745-53 Transporter Requirements</u> checklist. [OAC 3745-58-60(B)(2)]

N/A

RECYCLABLE MATERIALS - STORAGE FACILITY REQUIREMENTS	Y/N/NA	RMK #
5. Does the facility store recyclable materials which are reclaimed to recover precious metals as described in question 1.a through 1.h?	____	____
If so, is the facility in compliance with the manifest requirements of OAC 3745-65-71 and 3745-65-72? [3745-58-60(B)(2)]	____	____
6. Are records kept containing the following information as required by 3745-56-50(C):		
a. The volume of materials stored at the beginning of the year?	____	____
b. The amount of materials generated or received during the year?	____	____
c. The volume of materials remaining at the end of the year?	____	____
7. Do records indicate that the facility speculatively accumulates the materials? (as defined in OAC 3745-51-01(C)(8))	____	____
a. If yes, the facility is subject to 3745-52 to 3745-69 except Chapter 3745-58 and 3745-44 [3745-58-60)]. Please complete the appropriate checklists.		

REMARKS - RECYCLABLE MATERIAL GENERATOR, TRANSPORTER, STORAGE FACILITY REQS.

N/A

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?	_____	_____
a. If so, has the facility notified USEPA 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.

RCRA HAZARDOUS WASTE FACILITY
COMPLIANCE EVALUATION INSPECTION CHECKLIST

Facility: WCI STEEL, INC.

USEPA I.D.: OHD 060 409 521 HWFB No.: 02-78-0184

Street: 1040 Pine Ave.

City: Warren State: Ohio Zip: 44483

County: Trumbull Telphone:

Fax No: PUCO No.:

Owner/Operator: WCI STEEL, INC.

Street: 1040 Pine Ave.

City: Warren State: Ohio Zip: 44483

Telephone: Fax:

Inspection Date: 12 / 3 / 92 Time: 930 AM

Advance notice of inspection given? (yes) X (no) ____
If so, how far in advance? 3 days

	Name	Agency/Title	Phone
Inspectors:	Kristen Switzer	Ohio EPA/ESpecII	(216) 963-1107
	Tom Roth	↓	
Facility Representative:	Tom Shepker	WCI Steel	
	Keith McLaughlin	WCI Steel	
	Dave Calderwood	WCI Steel	

STATUS

Cond. Ex. SQG___ SQG___ Large Quantity Generator X
Treatment___ Storage X Disposal___ Transporter___

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

ACTIVITIES

Containers___
Tanks X
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:

K062

The facility generates spent pickle liquor from steel production operations. Generated spent pickle liquor is piped to a sump which can be off-loaded into 11 storage tanks in a tank farm located next to the sump. The facility accepts spent pickle liquor from off site generators which is also stored in the sump and 11 tanks. The sump and 11 tanks are permitted hazardous waste mgmt. units. The facility regenerates spent pickle liquor to raw acid in an acid regeneration plant for reuse. This process is not regulated under RCRA because it is a reclamation process.

Contingency plan update - name Δ, removed 12th tank from paperwo

Tank failure - 12th tank which stores regenerated HCl
non-permitted — top broke off
1400 gallons
will not repair or replace

Terne line acid → transported to acid regen. plant
Galvanize line acid → off-site due to Zn contam.

→ 2-3 mill gal off-site acid

All acid regenerated used at WCT Steel except Dover, Greez OH steel Co.

(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			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									

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?	Y	
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 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?	N	
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)?	NA	

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)]	NA	
i. What was the date of notification? _____		

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS

	Y/N/NA	RMK #
IDENTIFICATION NUMBER (OAC 3745-65-11)		
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	1990 1991
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)?	Y	
4. Is the waste analysis repeated when a process or operation generating hazardous waste changes? [3745-65-13(A)(3)(a)]	Y	
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)]	Y	
e. **FOR OFF-SITE FACILITIES:** The waste analysis that hazardous waste generators have agreed to supply? [3745-65-13(B)(5)]	Y	

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):** NA

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)]

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? NA

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?	Y	
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?	Y	
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)]	NA	
i. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required by OAC 3745-66?	NA	

	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)]?	NA	
b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) noted in writing on the manifest document?	Y	
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?	NA	
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?	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)]	Y	
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,	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)]	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;	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

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)]	NA	
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)]	NA	
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)]	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 accord-and with OAC 3745-66-16?	NA	
9. What permitted units at the facility have been closed in accordance with an approved closure plan? NA		
10. If closure was partial, list the regulated units which remain in use at the faciilty: NA		
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?	NA	
b. Land use is restricted under closure and post-closure rules? [3745-66-19]		

REMARKS - CLOSURE/POST CLOSURE REQUIREMENTS

TANK SYSTEM REQUIREMENTS (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 accumulate wastes in tanks for less than 90 days, 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,	Y	
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)]	Y	
b. **Existing tank system(s)** used to manage: F020, F021, F022, F023, F026 or F027 hazardous wastes? If so,	NA	
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)]		
c. **Existing tank system(s)** of known, documentable age?	NA	
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)]		

Y/N/NA RMK #

d. **Existing tank system(s)** for which the age cannot be documented? If so, NA _____

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)] NA _____

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. **IF THE O/O HAS NOT PROVIDED SECONDARY CONTAINMENT FOR THE TANK SYSTEM(S):** Has the owner/operator obtained a variance from secondary containment requirements of 3745-66-93 from the Director in accordance with 3745-66-93(G)(1)? NA _____

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,	Y	
1. Is the liner designed or operated to contain 100% of the capacity of the largest tank within its boundary? [3745-66-93(E)(1)(a)]	Y	
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(E)(1)(b)	Y	
3. Is the liner free of cracks and gaps? [3745-66-93(E)(1)(c)]	Y	
4. Does the liner completely surround the tank and cover all earth likely to be contacted by waste during a release? [3745-66-93(E)(1)(d)]	Y	
5. Are chemically resistant water stops in place at all joints? [3745-66-93(E)(1)(e)]	Y	
6. Is there a compatible interior coating or lining to prevent migration of waste into the concrete? [3745-66-93(E)(1)(f)]	Y	
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(E)(2)(a)]	NA	
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(E)(2)(b)]		
3. Are chemically resistant water stops in place at all joints? [3745-66-93(E)(2)(c)]		

	Y/N/NA	RMK #
4. Is there a compatible interior coating to prevent migration into the concrete? [3745-66-93(E)(2)(d)]	NA	
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(E)(2)(e)]		
6. Is the vault system provided with an exterior moisture barrier? [3745-66-93(E)(2)(f)]		
c. **Doubled-Walled Tank?** If so,	N	
1. Is the doubled-walled tank designed as an integral structure to contain any release from the inner tank? [3745-66-93(E)(3)(a)]	NA	
2. **If metal**, are the primary tank interior and outer shell exterior surfaces protected from corrosion? [3745-66-93(E)(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(E)(3)(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)]	N	

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)]	Y	
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)]	Y	
b. Is it placed on a foundation or base capable of providing support? [3745-66-93(C)(2)]	Y	
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)]	Y	
d. Is it sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? [3745-66-93(C)(4)]	Y	
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)]	Y	

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)]	Y/N	
9. If the answer to #8 is **NO**, is ancillary equipment:		
a. Inspected daily? **AND;**	Y	
b. Is ancillary equipment one of the following;		
i. Above ground piping (exclusive of flanges, joints, valves and conntections)?	Y	
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)? alarm	Y	

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)]	Y	
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? [3745-66-92(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? [3745-66-92(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? [3745-66-92(A)(4)]		
f. Does the assessment include design considerations to ensure that the tank foundations will maintain the load of a full tank? [3745-66-92(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? [3745-66-92(A)(5)(b)]		
h. Does the assessment include design considerations to ensure that the tank system will withstand the effects of frost heave? [3745-66-92(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)]	Y	
IN ACCORDANCE WITH OAC 3745-66-92(G), do the written statements address all of the following:		
a. Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)]	Y	
b. A statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)]?	NA	
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 have 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)]	NA	
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)]	NA	

REMARKS - TANK SYSTEMS WITHOUT SECONDARY CONTAINMENT

TANK SYSTEM - GENERAL OPERATING REQUIREMENTS (OAC 3745-66-94)

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)] — Y

   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(B)] — Y

   c. If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96? [3745-66-94(C)] — NA — had spill involving prodn tank + implemented cont. plan

TANK SYSTEM - INSPECTION REQUIREMENTS (OAC 3745-66-95)

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)] — Y

   b. Above ground portion of tank (daily)? [3745-66-95(A)(2)] — Y

   c. Data from leak detection equipment (daily)? [3745-66-95(A)(3)] — Y

   d. Construction materials and area immediately surrounding the tank for signs of erosion or release of hazardous waste (daily)? [3745-66-95(A)(4)] — Y

   e. Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(B)(1)] — NA

   f. Where applicable, all sources of impressed current at least bi-monthly? [3745-66-95(B)(2)] — ↓

REMARKS - TANK SYSTEM GENERAL OPERATING AND INSPECTION REQUIREMENTS

TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES (OAC 3745-66-98 AND 3745-66-99)	Y/N/NA	RMK #
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)]	NA	
OR;		
c. The tank is used solely for emergencies? [3745-66-98(A)(3)]	NA	
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)]	NA	
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]?	NA	
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 there been a leak or spill from any tank system or has any tank system been found unfit for use?	N	Product Tank
If so, did the owner/operator:		
a. Immediately cease flow of material into tank and investigate the cause of the release? [3745-66-96(A)]	NA	
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 conduct 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. Submit a written report of the incident to the Director within 30 days of the release? [3745-66-96(D)(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.

	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)]	NA	
i. 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)]	NA	
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	
i. 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

K062
D006 cadmium

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) 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)] — NA

   (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) 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)] — NA

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.

	Y/N/NA	RMK#
NO MIGRATION PETITION		
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) 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)]	NA	

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

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)]	NA	
(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,	Y	
(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)?	Y	
(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)]	Y	

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?	NA	
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)]	Y	
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)]	Y	
(b) Appropriate treatment standard for the waste? [O.A.C. Rule 3745-59-07(A)(1)(b); 40 CFR 268.7(a)(1)(ii)]	Y	
(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)]	Y	
(d) Waste analysis data, where available? [O.A.C. Rule 3745-59-07(A)(1)(d); 40 CFR 268.7(a)(1)(iv)]	Y	
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)]	Y	
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)]	NA	
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)]		
(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)]		
(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)]		
(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)]		
(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)]		

	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)]	NA	
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)]	NA	
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?	NA	
(a) If so, is the facility using the appropriate technology as required by O.A.C. Rule 3745-59-42 (40 CFR 268.42)?	NA	
(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?	NA	
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)]	NA	
(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)?	NA	
(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)]	NA	

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?	NA	
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)]	NA	
(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,	NA	
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)]	NA	
(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)?	NA	
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,	NA	
(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)]	NA	

TREATMENT OF CHARACTERISTIC HAZARDOUS WASTE

7. Does the facility treat characteristic hazardous waste(s) to render such waste(s) non-hazardous?	NA	
(a) If so, are treated waste(s) sent to a licensed solid waste disposal facility?	NA	
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)]	NA	

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)]	NA	
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)]	NA	
(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)]	NA	
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)]	NA	

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) 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)]	NA	
(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)]	NA	

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) The identification of the contents?	NA	
(b) The date which accumulation began?	NA	
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)):	Y	
(a) A description of its contents?	N	
(b) The quantity of each hazardous waste received?	N	
(c) The date each period of accumulation begins? or;	N	
(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)]	Y	
3. Are land disposal restricted wastes being stored at the facility for greater than one year? If so,	N	
(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)]	NA	

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) 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)]	NA	

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

OAC 3745-53 HAZARDOUS WASTE TRANSPORTER REQUIREMENTS

REGISTRATION AND IDENTIFICATION REQUIREMENTS (OAC 3745-53-11)	Y/N/NA	RMK #
1. Has the entity registered with the Public Utilities Commission of Ohio as a transporter of hazardous waste? [3745-53-11]	N	
What is the entity's PUCO Number? _____		
2. Has the transporter received a US EPA ID number prior to transporting hazardous waste? [3745-53-11(D)]	NA	
3. Have all wastes accepted for transport by the transporter been accompanied by a manifest prepared by the generator in accordance with 3745-52? [3745-53-20(C)]		
4. Has the transporter signed the manifest as required by 3745-53-20 and carried the manifest with the waste shipment as required by 3745-53-20(C)?		
5. Upon delivery of the hazardous waste to the next transporter or the designated facility, has the transporter signed the manifest as required by 3745-53-20(D)(1) and retained a signed copy for at least 3 years? [3745-53-22(A)]		
6. Has the transporter delivered the entire quantity of waste accepted from the generator in accordance with manifest instructions?		
a. In cases where this was not possible, has the transporter contacted the generator for further instructions and revised the manifest accordingly? [3745-53-21(A)(B)]		
7. If hazardous waste has been delivered to rail or water transporters, has the original transporter complied with the manifest handling requirements of 3745-53-20(E)(F)?		
8. If hazardous waste has been shipped out of the country, has the transporter retained signed copies of the manifest for at least 3 years indicating that the waste left the U.S.A.? [3745-53-22(D)]		

NA

	Y/N/NA	RMK #
9. Has the transporter ever had a discharge of hazardous waste during the time that the waste was under his control? If so,	____	____
a. Was immediate action taken? [3745-53-30(A)]	____	____
b. Were all of the notifications made as required by 3745-53-30(C)?	____	____
c. Was the discharge cleaned up as required by 3745-53-31?	____	____
10. Does the transporter store hazardous wastes temporarily while wastes are in transit? If so, are the following requirements met: [3745-53-12]	____	____
a. Are wastes stored for only 10 days or less?	____	____
b. Do wastes remain properly DOT packaged during storage?	____	____

NOTE: Temporary storage in stationary tanks is not permitted under transfer facility requirements and such storage requires a RCRA permit and is subject to interim status requirements for storage facilities. Any type of storage by the transporter which is not specifically authorized under OAC 3745-53-12 transfer facility requirements is subject to full RCRA regulation.

11. Does the transporter import hazardous waste into the United States?	____	____
12. Does the transporter mix hazardous wastes of different US DOT descriptions by placing them into a single container?	____	____

NOTE: A transporter that imports hazardous wastes or mixes wastes as defined in 3745-53-10(c) becomes a generator and is subject to the requirements of 3745-52.

13. Does the transporter receive SQG wastes for transport pursuant to a reclamation agreement?	____	____
If so, was the following information recorded in a log or shipping paper carried with the shipment as required by 3745-53-20(H):		
a. Name, address and US EPA ID # of SQG?	____	____
b. Quantity of waste?	____	____
c. DOT required shipping information?	____	____
d. Date waste accepted?	____	____

Y/N/NA RMK #

14. If the transporter receives SQG wastes for transport as described in Question 13, are records related to the shipments maintained for at least 3 years following expiration of the reclamation agreement? [OAC 3745-53-20(H)(4)] NA

REMARKS - TRANSPORTER REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

Facility Name: WARREN CONSOLIDATED INDUSTRIES INC. Date of Inspection 20 AUG. 1990; 22 AUG. 90
Address: 1040 PINE AVE SE HWFB #: 02-78-0184
WARREN, OHIO 44483-6528 USEPA ID #: OHD 060-409-521
County: TRUMBULL COUNTY Facility Phone #: (216) 841-8200

Facility Contact: TOM SHEPKER, MGR. ENV. CONTROL Facility Contact Phone# (216) 841-8200
DAVE CALDERWOOD, SUPV. REGEN. SERVICES Safety Equipment #: 841-8737
CELIA SEVASTOS, ENV. ENGINEER 841-8162
INSPECTOR(S) NAME(S): KRIS CODER, EE II
URSULA SCHALER, EE II
GORDON GARCIA, U.S. EPA, REGION II, ENVIRONMENTAL PROTECTION SPECIALIST (512) 886-809

STATUS
Cond. Ex. SQG___ SQG___ Generator X Transporter___ Treatment___ Storage X Disposal X

ACTIVITIES
Containers___ Tanks X 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)?	Y	
2. Are they :		
a. Abandoned(disposed;incinerated;accumulated, stored, or treated prior to disposal)?	Y	
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/A	
b. Burned for energy recovery?		
c. Reclaimed? (Refer to Table 1 of 3745-51-02)		
d. Accumulated speculatively?		
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?	N/A	
b. Used as an effective substitute for commercial products?		
c. Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock?		

	Y/N/NA	REMARK #
5. Are Land Disposal Restricted (LDR) wastes generated? If so, complete appropriate LDR checklist.	Y	SEE ATTACHED RCRA LAND DISPOSAL RESTRICTION INSPECTION
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.	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	
11. Was advance notice of the inspection given? If so, how far in advance?	Y	

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 SEEKING A HWFB PERMIT FOR THE STORAGE OF WASTE PICKLE LIQUOR FROM ON-SITE AND OFF-SITE GENERATION. FACILITY STORES WASTE HCL PRIOR TO REGENERATION BOTH FROM OFF-SITE GENERATORS AND ON-SITE GENERATION FROM 5 & 6 PICKLERS. FACILITY REGENERATES APPROX. 8 ½ MILLION GALLONS OF PICKLE LIQUOR ANNUALLY. RECEIVE ON-SITE 3rd PARTY HCL FROM BY-PRODUCTS (APPROX. 10,000 GALS/DAY). WASTE PICKLE LIQUOR GENERATED AT THE GALVANIZED AND TERN LINES ARE SHIPPED OFF-SITE TO BY-PRODUCTS. FACILITY GENERATES A BAGHOUSE DUST FROM THE GALVANIZED LINE. THIS DUST IS SHIPPED OFF AS A SOLID WASTE. FACILITY HAS AN UNCLOSED WASTEPILE (COAL PILE) WHICH IS BEFORE THE EBR.

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	NPDES LOW T SYSTEM
4. Is the generator classified as a Small Quantity Generator (SQG) or conditionally exempt SQG? If so, complete appropriate checklist.	N	
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))?	Y	
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	
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/A	
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	NEED TO MAK ACID SILICON TANK #5
b. The date that accumulation began is clearly marked on each container?	N/A	WITH WORDS
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	"HAZARDOUS WASTE"

	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.	Y	
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?		
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?		
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?		
9. Has the generator accumulated hazardous wastes in excess of ninety (90) days?	N	
10. Has the generator been granted an extension by the Director/ Regional Administrator for accumulation in excess of ninety (90) days?	N	
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)	N	NEED TO TRAIN ARW. PINKERTON + DOCUMENT TRAINING.
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)	N	NEED TO DOCU. TRAINING OF JE LEN.
14. Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41?	Y	FILED 2/28/90
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

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264/265.13]?

F-solvent (TCLP)* Yes X No ___ NA ___

Dioxin (TCLP) Yes ___ No ___ NA X

California List (PFLT and/or total constituent analysis)* Yes X No ___ NA ___

First & Second Third (TCLP and/or total constituent analysis) Yes X No ___ NA ___

* TCLP= Toxicity Characteristic Leaching Procedure (268, App. I)
PFLT= Paint Filter Liquids Test (SW-846)

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

Yes X No ___ Comments _____

a. What date was the waste analysis plan last revised?
JULY 19, 1989

b. Are analyses conducted on-site or off-site?

___ On-site X Off-site

Identify off-site lab: NUS AND RESEARCH OIL

c. Are F-solvent and dioxin containing waste analyzed using TCLP?

Yes ___ No X NA ___

d. Are California List wastes analyzed using the appropriate analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs).

Yes X No ___ NA ___

e. Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified BDAT* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.

Yes X No ___ NA ___

* BDAT= best demonstrated available technology

3. Are the operating records, including analyses and quantities, complete [264/265.73]?

Yes X No ___

4. Do operating records contain copies of the notification, certification, and demonstration (if applicable) from the generator? Records must be kept until closure of unit.

Yes X No ___ Comments FROM OFF-SITE GENERATORS YES DID NOT RETAIN NOTIFICATION AS A GENERATOR.

B. Storage (268.50)

1. Are prohibited wastes* stored on-site?

Yes X No ___ (If no, go to C, Treatment.)

* Prohibited wastes are a subset of restricted wastes, i.e., they are those restricted wastes that are currently ineligible for land disposal [53 FR 31208, August 17, 1988].

2. If yes, identify storage unit.

X Tanks
___ Containers
___ Other (Identify inappropriate storage unit(s).___

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

Yes ___ No ___ NA X

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage (264/265.73)?

   Yes X No ___

5. Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?

   Yes ___ No ___ NA X

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

   Yes X No ___ NA ___

   If yes, do the operating records show that the volume of waste removed from tanks annually equals or is greater than the tank volume?

   Yes X No ___

7. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?

   Yes X No ___ NA ___

8. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect [268.50(c)]?

   Yes ___ No X NA ___

   If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

   Yes ___ No ___ NA X

   If yes, state how: _____

9. Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored:

   a. In a facility meeting the TSCA criteria in 761.65(b)?

      Yes ___ No ___ NA X

   b. More than one year [268.50(f)]?

      Yes ___ No ___ NA ___

C. Treatment N/A

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

   Yes ___ No ___ (If no, go to D, Surface Impoundments.)

2. Describe the waste codes and treatment processes:

Waste Code	Treatment Processes

3. Was dilution used as a substitute for treatment [268.3]?

   Yes ___ No ___ Comments _____

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

   Yes ___ No ___ Comments _____

   Have treatment standards or prohibition levels been met?

   Yes ___ No ___ Comments _____

5. Does the facility ship any waste or treatment residue to an off-site disposal facility?

   Yes ___ No ___ NA ___

   If yes, does the treatment facility provide notification and certification to the disposal facility [268.7(b)(4) and (5)]??

   Yes ___ No ___ (If yes, the Generator portion of the checklist must be completed.)

6. If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements [268.7(a)]?

   Yes ___ No ___

7. Does the facility treat "soft hammer" wastes?

Yes ___ No ___ (If no, go to 8.)

a. If yes, is the waste treated in accordance with the generator's certification/demonstration [268.8(c)(1)]?

Yes ___ No ___

b. Did the treatment facility certify that the "soft hammer" waste was treated in accordance with the generator's demonstration, [268.8(c)(1)]?

Yes ___ No ___

8. Does the facility ship any "soft hammer" waste to an off-site treatment, recovery, disposal or storage facility?

Yes ___ No ___ NA ___

If yes, does the treatment facility send a copy of the generator's "soft hammer" demonstration and certification to the receiving treatment, recovery, disposal or storage facility along with its treatment certification [268.8(c)(2)]?

Yes ___ No ___ NA ___

Identify waste codes and off-site facilities:

Waste Code	Facility

9. Are notifications, demonstrations, certifications (if applicable), and results of waste analysis prepared by the generators, kept in the operating record until facility closure [264/265.73(b)]?

Yes ___ No ___

D. Surface Impoundments N/A

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

   Yes ___ No ___ List _____ (If no, go to E, Land Disposal.)

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment?

   Yes ___ No ___

3. Did the facility submit to the Agency, the waste analysis plan, as well as, the certification of compliance with minimum technology and ground-water monitoring requirements?

   Yes ___ No ___

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

   Yes ___ No ___ NA ___

5. Have the Subpart F groundwater monitoring requirements been met?

   Yes ___ No ___ NA ___

6. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

   Yes ___ No ___

   Attach test results.

7. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 40 CFR 268, or where no treatment standards are established for a waste, the applicable prohibition levels?

   Sludge Yes ___ No ___ Waste Code _____

   Supernatant Yes ___ No ___ Waste Code _____

8. Provide the frequency of analyses conducted on treatment residues:

   _____

   _____

   _____

9. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268?

   Yes ___ No ___

10. Are sludge residues that exceed the treatment standards and/or prohibition levels removed adequately on an annual basis?

    Yes ___ No ___ Comments _____

    a. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

       Yes ___ No ___

    b. Are residues subsequently managed in another surface impoundment?

       Yes ___ No ___

    c. Are residues treated prior to disposal?

       Yes ___ No ___ Comments _____

       If yes, are waste residues treated on-site or off-site?

       On-site _____ Off-site _____

       Identify waste code and treatment method:

Waste Code	Treatment Method

11. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume?

    Yes ___ No ___ Comments _____

E. Land Disposal

1. Are restricted and/or prohibited wastes placed in land disposal units such as landfills, surface impoundments, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers?

   Yes ___ No X

   Note: Do not include surface impoundments addressed in D, Surface Impoundments.

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

2. Does the facility's operating record contain notices, certifications, and "soft hammer" demonstrations from generators/storers/treaters? These records must be maintained until facility closure.

   Yes ___ No ___

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

   Yes ___ No ___

   If yes, at what frequency? _____

4. If prohibited wastes that exceed the treatment standards are placed in land disposal units (excluding wastes subject to national capacity variances) [268.30(a)], does the facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance from treatment standards [268.44]?

   Yes ___ No ___

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance or the "soft hammer" provisions?

   Yes ___ No ___ Comments _____

   If yes, have the minimum technology requirements been met for all units receiving such wastes?

   Yes ___ No ___

6. Does the facility have notices [268.7(a)(3)] and records for disposed wastes that are subject to national capacity variances, case-by-case extensions [268.5], no migration petitions [268.6], or a variance from treatment standards?

   Yes ___ No ___ NA ___

7. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

   Yes ___ No ___ NA ___

8. Are restricted wastes placed in underground injection wells?

   Yes ___ No ___ List _____

NUS CORPORATION

Laboratory Services Group
5350 Campbells Run Road
Pittsburgh, PA 15205

NUS CORPORATION
P.O. Box 630832
Baltimore, MD 21263-08

412-747-2500

LABORATORY ANALYSIS REPORT

CLIENT NAME: WARREN CONSOLIDATED INDUSTRIES
ADDRESS: P. O. BOX 1550
WARREN,, OH 44482-1550

NUS CLIENT NO: 0821 0001
VENDOR NO: 10216801
WORK ORDER NO: 55830

REPORT DATE: 08/14/90

ATTENTION: MR. TOM SHEPKER
CC:

SAMPLE IDENTIFICATION: PICKLE LIQUOR # 5 SUGAR TANK AS REC'D
NUS SAMPLE NO: P0138771
DATE SAMPLED : 14-MAY-90
DATE RECEIVED: 15-MAY-90
APPROVED BY: J Simanic

TEST	DETERMINATION	RESULT	UNIT
AASW	Arsenic	< 0.03	mg/L
ABAW	Barium	0.15	mg/L
ACDW	Cadmium	1.6	mg/L
ACRW	Chromium	34	mg/L
APBW	Lead	2.5	mg/L
AHGW	Mercury	< 0.0004	mg/L
ASEW	Selenium	< 0.04	mg/L
AAGW	Silver	0.28	mg/L
AFEW	Iron	100000	mg/L
AZNW	Zinc	7.0	mg/L
I490	pH	< 1	
S090	Flash Point (Pensky Marten)	>200	F
I740	Sulfide (as S)	< 0.8	mg/L
I680	Oil and Grease, Extraction/Gravimetric	28	mg/L
I590	Solids, Dissolved at 180C	260000	mg/L
I278	Cyanide, Reactive (HCN)	< 10	mg/L
S171	Sulfide, Reactive (H2S)	21	mg/L
S071	Corrositivity, NACE Std TM-01-69	21.1	mm/yr

COMMENTS:

NUS CORPORATION

Laboratory Services Group
5350 Campbells Run Road
Pittsburgh, PA 15205

NUS CORPORATION
P.O. Box 630832
Baltimore, MD 21263-083
412-747-2500

LABORATORY ANALYSIS REPORT

CLIENT NAME: WARREN CONSOLIDATED INDUSTRIES
ADDRESS: P. O. BOX 1550
WARREN,, OH 44482-1550

NUS CLIENT NO: 0821 0001
VENDOR NO: 10216801
WORK ORDER NO: 55830

REPORT DATE: 08/14/90

ATTENTION: MR. TOM SHEPKER
CC:

SAMPLE IDENTIFICATION: WASTE PICKLE LIQUOR GALVANIZING-TERNE LONE/SUMP AS REC'D
NUS SAMPLE NO: P0138773
DATE SAMPLED : 14-MAY-90
DATE RECEIVED: 15-MAY-90
APPROVED BY: J Simanic

TEST	DETERMINATION	RESULT	UNIT
AASW	Arsenic	0.09	mg/L
ABAW	Barium	0.12*	mg/L
ACDW	Cadmium	1.1	mg/L
ACRW	Chromium	21	mg/L
APBW	Lead	110	mg/L
AHGW	Mercury	0.0009	mg/L
ASEW	Selenium	< 0.04	mg/L
AAGW	Silver	0.17	mg/L
AFEW	Iron	26000	mg/L
AZNW	Zinc	1300 **	mg/L
I490	pH	< 1	
$090	Flash Point (Pensky Marten)	>200	F
I740	Sulfide (as S)	< 0.8	mg/L
I680	Oil and Grease, Extraction/Gravimetric	6	mg/L
I590	Solids, Dissolved at 180C	260000	mg/L
I278	Cyanide, Reactive (HCN)	< 10	mg/L
$171	Sulfide, Reactive (H2S)	110	mg/L
$071	Corrositivity, NACE Std TM-01-69	101	mm/yr

COMMENTS: * This sample was analyzed as a matrix spike. Recovery of the spike was outside the established acceptance limits. However, the preparation blank and laboratory control sample were found to be in control, indicating the presence of a matrix interference.
** Spike recovery outside acceptance limits; however sample value is 4 times greater than amount of spike added. No corrective action is required.

NUS CORPORATION

Laboratory Services Group
5350 Campbells Run Road
Pittsburgh, PA 15205

NUS CORPORATION
P.O. Box 630832
Baltimore, MD 21263-0
412-747-2500

LABORATORY ANALYSIS REPORT

CLIENT NAME: WARREN CONSOLIDATED INDUSTRIES
ADDRESS: P. O. BOX 1550
WARREN,, OH 44482-1550

NUS CLIENT NO: 0821 0001
VENDOR NO: 10216801
WORK ORDER NO: 55830

REPORT DATE: 08/14/90

ATTENTION: MR. TOM SHEPKER
CC:

SAMPLE IDENTIFICATION: PICKLE LIQUOR # 6 REGENERATION AS REC'D
NUS SAMPLE NO: P0138772
DATE SAMPLED : 14-MAY-90
DATE RECEIVED: 15-MAY-90
APPROVED BY: J Simanic

TEST	DETERMINATION	RESULT	UNIT
AASW	Arsenic	< 0.015	mg/L
ABAW	Barium	0.18	mg/L
ACDW	Cadmium	1.5	mg/L
ACRW	Chromium	13	mg/L
APBW	Lead	2.7	mg/L
AHGW	Mercury	< 0.0004	mg/L
ASEW	Selenium	< 0.02	mg/L
AAGW	Silver	0.26	mg/L
AFEW	Iron	69000	mg/L
AZNW	Zinc	5.3	mg/L
I490	pH	< 1	
S090	Flash Point (Pensky Marten)	>200	F
I740	Sulfide (as S)	< 0.8	mg/L
I680	Oil and Grease, Extraction/Gravimetric	28	mg/L
I590	Solids, Dissolved at 180C	160000	mg/L
I278	Cyanide, Reactive (HCN)	< 10	mg/L
S171	Sulfide, Reactive (H2S)	73	mg/L
S071	Corrositivity, NACE Std TM-01-69	8.5	mm/yr

COMMENTS:

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

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

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

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

LIST OF RESTRICTED WASTES

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

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

	Gen/Trans/Treat/Store/Disp
F011*	/ / / /
F012*	/ / / /
F019	/ / / /
F024*	/ / / /
K001*	/ / / /
K004	/ / / /
K005 (NWW)*	/ / / /
K007 (NWW)*	/ / / /
K008	/ / / /
K009*	/ / / /
K010*	/ / / /
K011(NWW)*	/ / / /
(WW)	/ / / /
K013(NWW)*	/ / / /
(WW)	/ / / /
K014(NWW)*	/ / / /
(WW)	/ / / /
K015(WW)*	/ / / /
K016*	/ / / /
K017	/ / / /
K018*	/ / / /
K019*	/ / / /
K020*	/ / / /
K021(NWW)*	/ / / /
(WW)	/ / / /
K022(NWW)*	/ / / /
(WW)	/ / / /
K023*	/ / / /
K024*	/ / / /
K025(NWW)*	/ / / /
(WW)	/ / / /
K027*	/ / / /
K028*	/ / / /
K029(NWW)*	/ / / /
(WW)	/ / / /
K030*	/ / / /
K031	/ / / /
K035	/ / / /
K036*	/ / / /

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

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: WARREN CONSOLIDATED INDUSTRIES, INC.

U.S. EPA I.D. No. : OHD 060-409-521

Street: 1040 PINE AVE S.E.

City: WARREN State: OH Zip: 44483

Telephone: (216) 841-8200

Owner/Operator:

Street: SAME AS ABOVE

City: State: Zip:

Telephone:

Inspection Date: 20 AUG. 90 AND 22/AUG/90 Time: 10-00

Weather Conditions: FAIR / CLOUDY

	Name	Agency/Title	Telephone
Inspectors:	KRIS CODER	OEPA, EE II,	(216) 425-9171
	URSULA SCHALER	OEPA, EE II,	(216) 425-9171
	GORDON GARCIA	U.S. EPA, ENVIRONMENTAL PROTECTION SPECIALIST,	(312) 886-8097
Facility Representative:	TOM SHEPKER	MGR. ENV. CONTROL,	(216) 841-8200
	DAVE CALDERWOOD	SUPV. REGENERATION SERVICES,	(216) 841-8735
	CELIA SEVASTOS	ENV. ENGINEER,	(216) 841-8162

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

Revised 10-20-89

INSPECTION SUMMARY

Processes That Generate LDR Wastes

PICKLING AND COATING OPERATIONS AS A PRIMARY STEEL PRODUCER.

LDR Waste Management

PICKLE LIQUOR IS GENERATED ON-SITE. PIPED TO CENTRAL LOCATIONS AND EITHER REGENERATED ON-SITE TO SHIPPED OFF-SITE FOR DISPOSAL. OFF-SITE RECEIPT OF PICKLE LIQUOR AMOUNTS TO APPROX. 15%. RECEIVE OFF-SITE PICKLE LIQUOR FOR REGENERATION.

Summary

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1. Does the facility handle the following wastes?

   a. F001 through F005 spent solvents

      Yes X No ___ List* _____

   b. Dioxin-containing Wastes

      Yes ___ No X List* _____

   c. California List Wastes

      Yes X No ___ List* K062

   d. First and Second Third Wastes

      Yes X No ___ List* K062

   * List wastes if room allows or attach Appendix A.

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

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

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

      Yes ___ No X Comments _____

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

      Yes ___ No X Comments _____

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

      Yes ___ No X Comments _____

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

Yes ___ No X Comments _____

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

Yes ___ No X Comments _____

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

Yes ___ No X Comments _____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

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

   Yes Y No ___ NA ___

   If yes, check the appropriate treatability group.

   ___ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)
   X All other spent solvent wastes

2. First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

   Yes X No ___ NA ___

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

Waste Code	Wastewater*	Non-wastewater
K062		X

* Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

   a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

      Yes ___ No X NA ___

      If yes, specify the method: _____

b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

Yes ___ No X NA ___

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

___

___

___

c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O?

Yes ___ No X NA ___

4. Does the generator mix restricted wastes with different treatment standards?

Yes ___ No X Comments ___

If yes, did the generator select the most stringent treatment standards (268.41(b), 268.43(b))?

Yes ___ No ___ Comments ___

B. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

- Knowledge of waste Yes X No ___

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.

K062 WASTE PICKLE, WHEN GENERATED

F001 WASTE OILS.

Was all supporting data retained on-site, [268.7(a)(5)]?

Yes X No ___

- TCLP Yes ___ No X NA ___

List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

___

- Total constituent analysis Yes X No ___ NA ___

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.

8/14/90 ; SEMI-ANNUAL FREQUENCY, ATTACHED TEST RESULTS.

- pH ≤ 2 Yes X No ___ NA ___

List the wastes for which pH testing was used.

K062 - PICKLE LIQUOR #5 SURG TANK; PICKLE LIQUOR

- Paint Filter Liquid Test Yes ___ No X NA ___

List the wastes for which PFLT was used.

___

2. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

Yes ___ No X NA ___

C. Management

1. On-Site Management

Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

Yes X No ___ Comments ___

If yes, the TSD Checklist must be completed.

2. Off-Site Management

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

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

If yes, identify waste code and off-site treatment or storage facilities:

Waste Code	Facilities	Treat/Store
K062	BY-PRODUCTS AND MILL SERVICES	BY-PRODUCTS-STORES / MILL SERVICES-TREATS & S
F001	RESEARCH OIL	STORE

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

Yes X No ___

- Does notification contain the following?

EPA Hazardous waste number(s) Yes X No ___

Applicable treatment standards and prohibition levels Yes X No ___

Manifest number Yes X No ___

Waste analysis data, if available Yes X No ___ ONLY ON REQUEST.

b. Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?

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

If yes, identify waste code and off-site disposal facilities:

Waste Code	Facility

- Does the facility provide notification and certification to the disposal facility [268.7(a)(2)]?

  Yes ___ No ___ N/A

- Does notification contain the following? N/A

  EPA Hazardous waste number(s) Yes ___ No ___

  Applicable treatment standards and prohibition levels Yes ___ No ___

  Manifest number Yes ___ No ___

  Waste analysis data, if available Yes ___ No ___

  Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)] Yes ___ No ___

c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

   Yes ___ No X (If no, go to d)

- If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

  Yes ___ No ___

- Does the notification contain the following information?

  EPA hazardous waste number Yes ___ No ___

  The corresponding treatment standards and all applicable prohibitions Yes ___ No ___

  Manifest number Yes ___ No ___

  Waste analysis data, if available Yes ___ No ___

  Date the waste is subject to the prohibitions Yes ___ No ___

d. Does the facility generate any First or Second Third "soft hammer" waste?

   Yes ___ No ___ N/A (If no, go to 4)

- Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?

(i)	EPA hazardous waste number	Yes ___	No ___
(ii)	Applicable prohibition [268.33(f), 268.34(h)]	Yes ___	No ___
(iii)	Manifest number	Yes ___	No ___
(iv)	Waste analysis data, if available	Yes ___	No ___

3. "Soft Hammer" Demonstrations/Certifications N/A

a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?

Yes ___ No ___

b. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

Yes ___ No ___

c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?

Yes ___ No ___

- If yes, did the generator submit the documentation and certification prior to first shipment?

Yes ___ No ___

d. Does the demonstration contain the following information?

A list of facilities and facility officials contacted?	Yes ___	No ___
Addresses	Yes ___	No ___
Telephone numbers	Yes ___	No ___
Contact dates	Yes ___	No ___
Certification statement	Yes ___	No ___

Attach a copy of the demonstration and certification.

e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes ___ No ___ NA ___

If yes, attach a copy of written discussion.

f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes ___ No ___

Describe the type of treatment and treatment facilities:

Waste Code	Type of Treatment	Treatment Facility

g. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

Yes ___ No ___

h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes ___ No ___ NA ___

4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes ___ No X Comments ALSO SEE COMMENT UNDER TSD REQUIREMENTS, PAGE 2.

D. RCRA Corrective Action and CERCLA Response Action Waste

1. Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?

   Yes ___ No X Comments _____

2. Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?

   Yes ___ No X NA ___ Comments _____

E. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

   Yes ___ No X

   List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes

2. Are treatment residuals generated from these units?

   Yes ___ No ___ Comments _____

   If yes, the residues are subject to the LDR generator requirements.

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

   Yes ___ No ___ NA ___ Comments _____

   If yes, the TSD checklist must be completed.

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))?	Y	
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	CONCERN IS THAT PLAN BE ORGANIZED TO INCLUDE FREQ OF ANALYSIS. THIS INFO IS AVAILABLE BU IS IN CONT. PL
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))	Y	
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) AND OAC 3745-66-93(C)(4)	N	NEED TO REVISE INSPE TION FORMS FOR REMEDI ACTION TO REMOVE LIQ OR PRECIPITA FROM SECONDA CONTAINMENT AND SUMPS W IN 24 HRS A.S.A.P.

	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))	N	SEE PREVIOUS COMMENTS
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))	N	
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.		
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)		

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? (RELEASE TO SECONDARY CONTAINMENT)	Y	RELEASE INTO GALVANIZED
a.	If yes, has the contingency plan been implemented?	N/A	SUMP SECOND. CONTAINMENT ON 20 AUG. 90 TO BE FOLLOWED UP W/ 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?	N/A	
b.	Access to telephone, radio or other device for summoning emergency assistance?	Y	REPORT +
c.	Portable fire control equipment?	Y	CERTIFICATION
d.	Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	Y	OF REPAIR
4.	Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary? [3745-65-33] (265.33)	Y	IN-PLANT FIRE MARSHALL.
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/A	

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?	Y	NEED TO BE PART OF PLAN
c.	Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?	N	NEED TO REVISE
d.	A list of all emergency equipment including location, physical description and outline of capabilities?	N	
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))?	N/A	
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)	N	
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	

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?	Y	
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))?	Y	

	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	FILED 2/28/90
NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.		
3. Are manifests received by the facility signed and dated? 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)	N/A	
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))?		
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.		
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?		
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?		

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS N/A

A. Does the transporter accumulate waste for more than 10 days [268.50(a)(3)]?

Yes ___ No ___

If yes, check the appropriate regulatory status:

___ Interim status for storage
___ RCRA permit for storage

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

_____

_____

_____

B. Does the transporter mix, combine, or recontainerize wastes?

Yes ___ No ___

If yes, list the restricted wastes that have been mixed.

_____

_____

_____

C. Is the waste treated in an exempt treatment process on-site?

Yes ___ No ___

3745-66 STORAGE AND TREATMENT IN TANKS (40 CFR PART 265, SUBPART J)

Applicability: This checklist applies to owners or operators of facilities that use tank systems for storing or treating hazardous waste.

Note: Tanks used to store or treat wastes containing no free liquids (confirmed by the paint filter liquid test) that are located inside a building with an impermeable floor are exempt from secondary containment requirements 3745-66-93 (265.193).

For generators who store wastes in tanks for less than 90 days use all items except 24. Compliance with 3745-66-97(C) and OAC 3745-66-991 (265.191) (265.197) is not required.

	Y/N/NA	REMARK #
1. Has the o/o obtained a variance from the secondary containment requirements of 3745-66-93 (265.193) from the (Regional Administrator/Director. If yes, skip items 2 through 6.	N/A	
2. Has the o/o installed secondary containment which meets the requirements of 3745-66-93 (265.193) for each of the following classes of tank systems by the date specified. [3745-66-93(A)] (265.193)		
a. For all new tank systems prior to being put into service.	Y	
b. For all existing tanks used to handle waste No.'s F020, F021, F022, F023, F026, F027, before January 12, 1989.	N/A	
c. For existing tank system of known and documentable age, the latter of January 12, 1989, or when the tank reaches 15 years of age.	N/A	
d. For existing tank systems of undocumentable age, by January 12, 1995 or, if the facility was built prior to January 12, 1980, the latter of (1) when facility reaches 15 years of age or (2) January 12, 1989.		
e. For tank systems used to handle materials that became hazardous wastes after January 12, 1987, within the time frames required in (a) and (b) above, except that the date the material becomes a hazardous waste plus two years must be usbstituted for January 12, 1989.	N/A	

	Y/N/NA	REMARK #

Note: If the tank system has no secondary containment, skip to #7.

3. Was the secondary containment system(s) at the facility designed, installed and operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulated liquids . [3745-66-93(B)] (265.193(b)) — Y

4. At a minimum is the secondary containment system: [3745-66-93(C)] (265.193(c))

   a. Constructed or lined with compatible materials with sufficient strength to prevent failure. — Y
   b. Placed on a foundation or base capable of providing support. — Y
   c. Provided with a leak detection system that is designed/operated to detect failure of primary or secondary containment or any release of hazardous waste in the secondary containment system within 24 hours of at earliest practicable time is provided. — Y
   d. Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation and is liquid removed within 24 hours or in a timely manner. — Y

5. Is the secondary containment system for tanks a liner (external to the tank), vault, double-walled tank or an equivalent device approved by the Director/Regional Administrator? [3745-66-93(D)(E)] (265.193(d)(e)) — Y

   a. External Liner

      1. Is the external liner designed and operated to contain 100% of the capacity of the largest tank? — Y
      2. Is the external liner designed and operated to prevent run-on and infiltration into the liner; or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? — Y

	Y/N/NA	REMARK #
3. Is the exterian liner free of cracks and gaps?	Y	
4. Does the external liner completely surround the tank and cover all earth likely to be contacted by waste during release?	Y	

b. Vault System

1. Is the valut system designed and operated to contain 100% of the capacity of the largest tank?	N/A	
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?		
3. Are chemically resistant water stops in place at all joints?		
4. Is there a compatible interior coating or lining to prevent migration of waste into the concrete?		
5. If ignitable or reactive waste is being managed, is the vault system provided with a means to prevent formation or ignition of vapors?		
6. Is the vault system provided with an exterior moisture barrier?		

c. Doubled-Walled Tank

1. Is the doubled-walled tank designed as an integral structure so any release from the inner tank is contained?	N/A	
2. If metal, are the primary tank interior and outer shell exterior surfaces protected from corrosion?		
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?		

	Y/N/NA	REMARK #
6. Is ancillary equipment including above ground piping, welded flanges and joints, sealless pumps and valves, provided with secondary containment (e.g., double-walled piping, jacketing, trench)?	Y	
a. If no, is ancillary equipment inspected daily for leaks? [3745-66-93(F)] (265.193(f))	Y	
7. For existing tank system, without secondary containment that meets 3745-66-93 (265.193) standards, does the o/o have a written assessment certified by an independent P.E. that includes all of the following: [3745-66-91(A)(B)] (265.191(a)(b))	N/A	
a. Design standards?		
b. The characteristics of hazardous waste(s) that have been or will be handled?		
c. Corrosion protection measures?		
d. The age of the tank system has been estimated or documented?		
e. A leak test for non-enterable underground tanks?		
f. A leak test or an internal inspection by qualified P.E. for <u>other than</u> non-enterable underground tanks?		
8. Have the tests specified in 7f and 7g been conducted annually until secondary containment is provided [3745-66-93(I)(4)] (265.193(4)):		
9. For tank systems found to be leaking or unfit for use as a result of the above tests or inspections, has the o/o complied with 3745-66-96 (265.196)? If no, this is a violation of [3745-66-93(I)(4) (265193(i)(4))	N/A	
10. 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)] (265.191(c))	N/A	

	Y/N/NA	REMARK #
11. For all tanks found to be leaking or unfit for use as a result of the assessment the o/o has complied with 3745-66-96 265.196 (see #18) [3745-66-91(D)] (265.191(d) and [3745-66-93(I)] (265.193(i)(4))	N/A	
12. For new tank systems, (constructed began after July 14, 1986) has the o/o obtained a written assessment certified by an independent qualified P.E. that includes all of the following: [3745-66-92(A)] (265.192(a))		
a. Design standards	Y	
b. The characteristics of hazardous waste to be stored or treated	Y	
c. Corrosion protection for tank systems in contact with soil or water	Y	
d. Protection from vehicular traffic for undergroun tanks	Y	
e. Adequacy of tank foundation, proper anchoring and effects of frost heave	Y	
13. 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, designed and that required repairs were performed [3745-66-92(G)] (265.192(g)). Does the statement address all of the following:		
a. Inspection for damage and/or inadequate construction and installation and a statement that deficienices were corrected before the tank system was covered or put into use. [3745-66-92(B)] (265.192(b))	Y	
b. Proper backfilling; [3745-66-92(C)] (265.192(c))	Y	
c. Tightness test, if the tank was found not to be tight proper repairs were made; [3745-66-92(D)] (265.192(d))	Y	
d. Proper support and protection of ancillary equipment; [3745-66-92(E)] (265.192(e))	Y	
e. Supervision of the installation of field fabricated corrosion protection. [3745-66-92(F)] (265.192(f))	Y	

	Y/N/NA	REMARK #
14. Has the o/o of a tank system with a variance from secondary containment at which a release of hazardous waste has occurred from the tank but has not migrated beyond the zone of engineering control complied with 3745-66-96(A)(B)(C)(E)(F) and 265.196 (a)(b)(c)(e) and (f) and decontaminated or removed contamined soil. If soil cannot be removed, has the tank been closed [3745-66-93(G)(3)] (265.193(g)(3))	N/A	
15. Has the o/o of a tank system with a variance from secondary containment at which a release of hazardous waste has occurred from the tank and has migrated from the zone of engineering control complied with 3745-66-96(A)(B)(C) and (D) (265.196 (265.193(g)(4)(i) and (ii)? See #18	N/A	
16. Does the o/o follow the general operating requirements below: [3745-66-94] (265.194)		
a. Hazardous waste or treatment reagents are not placed in the tank or secondary containment if they can cause the system to leak, rupture, corrode, or owthwise fail.	Y	
b. The o/o uses appropriate controls to prevent spills or overflows from the system (e.g., check valves, high level alarms)	Y	
c. The o/o has complied with 3745-66-96 (265.196) when a leak or spill has occurred.	Y	
17. Has the o/o documented the inspections required in 3745-66-95 (265.195), in the operating record of the facility, including the following:		
a. Spill control equipment (daily).	Y	
b. Above ground portion of the tank (daily).	Y	
c. Data from leak detection equipment (daily).	Y	
d. Construction materials and the immediate area surrounding the tank to detect signs of erosion or signs of releases of hazardous waste (daily).	Y	

	Y/N/NA	REMARK #
e. The cathodic protection system to confirm its proper operation within six months of its initial installation and annually thereafter.	N/A	
f. All sources of impressed current at least bi-monthly.	/	
18. Has the o/o of a tank system or secondary containment system <u>from which there has been a leak or spill or which is unfit for use</u> removed the tank from service and satisfied the following requirements. 3745-66-96 (265.196)		
a. Immediately ceased flow into tank and investigated cause of release	Y	PER LETTER DATED AUG. 28, 1990
b. For release from tank system, removed waste to prevent further release within 24 hours of detection or earliest practicable time.	Y	
c. For releases to a secondary containment system removed all released material within 24 hours or as timely as possible to prevent harm to human health and the environment.	Y	
d. Immediately conducted a visual inspection of the release and prevent further migration and removed and disposed of any visible contamination of soil or surface water.	Y	
e. Reported any release to the environment to the Director (Regional Administrator) within 24 hour unless it is less than 1 lb. and was cleaned up immediately.	N/A	NO RELEASE TO THE ENVIRONMENT.
f. Submitted a report wihtin 30 days of the release to Director (Regional Administrator).	Y	
19. If a release has occured from the tank system have the following requirements been satisfied: 3745-66-96(E)(1) (265.196(e)(1))		
a. The cause of the release was a spill which did not damage the tank system and the o/o returned the system to service.	N/A	
b. The cause of the release was a leak from the primary tank and the system was repaired and returned to service.	Y	

	Y/N/NA	REMARK #
c. If the source of the release was a leak from a component without secondary containment the component was provided with secondary containment or visually inspected above ground.	N/A	
d. If a through e have not been satisfied, has the tank been closed in accordance with OAC 3745-66-97?	N/A	
e. The o/o has obtained certification from an independent P.E. if the repairs were major (i.e., installation of liner, repair of ruptured primary or secondary containment vessel).	Y	
20. If the requirements if #17 have not been met, has the o/o completed closure of the tank system in accordance with 3745-66-97 (265.197)?	N/A	
21. 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)] (265.198(a))		
a. The waste is treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o complied with 3745-65-17(B) (265.17(b)); or	N/A	
b. The waste is stored or treated to protect it from materials or conditions which may cause ignition or reaction; or		
c. The tank is used solely for emergencies.		
22. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management area and any public streets, alleys or adjoing property lines as required by the NFPA flammable or combustible code (1977 or 1981): [3745-66-98(B)] (265.198(b))	N/A	

	Y/N/NA	REMARK
23. 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] (265.199)?	N/A	
a. If so, have the requirements of 3745-65-17(B) (265.17(b)) been met?		
24. In addition to conducting the waste analysis required by 3745-65-13 (165.13) 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] (265.200)		
a. Conducted waste analysis and trial treatment storage tests.	N/A	
b. Obtained written documentation on similar waste under similar operating conditions.		

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*	THE LATEST REVISION IS MAY 1989 SUBMITTED A PART OF THE FACILITY'S PART B.
	a. A description of how each hazardous waste management unit will be closed in accordance with 265.111.		
	b. A description of how final closure will meet the requirements of 3745-66-11 (265.111).		
	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)] (265.112(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/Regional Administrator 180 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))		
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))		

* A THOROUGH REVIEW OF THIS PLAN WAS NOT DONE AS PART OF THIS INSPECTION. TECHNICAL ADEQUACY OF THE PLAN IS BEING DONE THROUGH THE REVIEW OF THE FACILITY'S PART B APPLICATION. CLOSURE OF THE COAL PILE (WASTE PILE) IS STILL AN ISSUE BEFORE THE EBR (ENVIRONMENTAL BOARD OF REVIEW).

		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))	_____	_____
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))	_____	_____
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)	_____	_____
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?	_____	_____
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 facility: _____ _____		
11.	If required, has the facility prepared a written post-closure plan? [3745-66-18] (265.118)	_____	_____
12.	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?	_____	_____

	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)	_____	_____
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?	_____	_____
b. Land use is restricted pursuant to 3745-66-17? [3745-66-19] (265.119)	_____	_____

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)	N	
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	
(2)	A run-on control system capable of handling a 24 hr, 25-yr storm has been implemented; and	N	
(3)	A run-off management system capable of controlling a 24 hr, 25-yr storm has been implemented; and	N	
(4)	Facilities associated with run-on and run-off control systems are managed to maintain design capacity after a rain event; or	N	
b. (1)	The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff; and	N	
(2)	No liquids or wastes containing free liquids are placed in the pile.	N/A	
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)	N/A	

* SEE PREVIOUS COMMENT CONCERNING CLOSURE OF WASTE PILE (COAL PILE).

	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.		
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))		
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))		
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)		

Cmu/FH

~~CMEL~~
~~INSP~~
LBAN
LDF
ISS

OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office
2110 E. Aurora Road
Twinsburg, Ohio 44087-1969
(216) 425-9171
FAX (216) 487-0769

Richard F. Celeste
Governor

RECEIVED
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OHIO EPA
DIV OF SOLID &
HAZ WASTE MGMT

September 18, 1990

CERTIFIED MAIL

Thomas Shepker
Manager, Environmental Control
Warren Consolidated Industries, Inc.
1040 Pine Avenue, S.E.
Warren, OH 44483-6528

RE: Warren Consolidated Industries, Inc.
Trumbull County
02-78-0184
OHD 060-409-521
Generator, Storage and Disposal Facility

Dear Mr. Shepker:

On August 20th and 22nd, 1990, I conducted a hazardous waste inspection of Warren Consolidated Industries, Inc., located at 1040 Pine Avenue, S.E., Warren.

Ursula Schaler and Gordon Garcia, U.S. EPA Region V, accompanied me on the first day of the inspection. You, Dave Calderwood and Celia Sevastos represented the facility during the inspection. The facility was inspected for compliance to both Ohio and Federal hazardous waste regulations. Enclosed is a copy of the RCRA Interim Status Inspection Form. Also, enclosed is a copy of the RCRA Land Disposal Restriction Inspection Checklist. A copy of this checklist is being forwarded to the U.S. EPA, Region V for appropriate follow-up.

During the inspection the following violations were noted. These violations need your immediate attention:

1.) OAC 3745-52-34, accumulation time of hazardous waste:

The facility failed to clearly mark the #5 silicon tank with the words "Hazardous Waste", which is a violation of OAC 3745-52-34. Although the facility is seeking to permit this tank as part of its Hazardous Waste Facility Board Part B permit application, the tank must be managed as a less than 90 day accumulation tank since this tank did not appear on the facility's original Hazardous Waste Facility Board Permit.

Please document compliance by providing a photograph of the tank with the hazardous waste marking.

2.) OAC 3745-65-16, Personnel Training and Employee Training Records:

The facility failed to provide hazardous waste training for Arwood Pinkerton, which is a violation of OAC 3745-65-16. The facility failed to have adequate training records documenting that Joe Len received annual hazardous waste training, which is a violation of OAC 3745-65-16.

To document compliance, the facility must provide hazardous waste training for Arwood Pinkerton and provide me with a copy of the record(s) documenting his training. The facility must also provide me with a copy of the hazardous waste training record(s) for Joe Len.

3.) OAC 3745-65-15, General Inspection Requirements; OAC 3745-66-93 (C) (4), Containment and Detection of Releases:

The facility is to revise the inspection logs in the waste pickle liquor accumulation areas to include the remedial actions necessary to remove liquids and precipitation from the tank secondary containment systems. OAC 3745-66-93 (C) (4) requires the facility to remove liquids from the secondary containment systems, resulting from spills, leaks or precipitation, within 24 hours or in a timely manner as is possible. Warren Consolidated Industries' inspection logs failed to provide this information, which is a violation of OAC 3745-65-15 and OAC 3745-66-93 (C) (4).

Please document compliance by providing a copy of the revised inspection log(s) showing the timely removal of liquids from the secondary containment systems.

4.) OAC 3745-65-54, Amendment of Contingency Plan; OAC 3745-65-52, Content of Contingency Plan:

The facility failed to amend the list of Emergency Coordinators, which is a violation of OAC 3745-65-54. The Contingency Plan failed to include a list of all emergency equipment, its location and physical description and capabilities, which is a violation of OAC 3745-65-52.

The facility is to document compliance by amending the Contingency Plan to include the change in Emergency Coordinators and to include the addition of lime or soda ash to the list of emergency equipment. Also, the amended plan must include the location(s) of the lime or soda ash storage area(s). The plan must also include the location of all emergency equipment and a brief outline of its capabilities. As an additional concern and even though the facility has the agreements/arrangements with the local and state authorities, the facility must make these agreements and arrangements a part of the Contingency Plan. As required by OAC 3745-65-53, all revisions to the Contingency Plan must be submitted to all local and state authorities.

Please, within 30 days of receipt of this letter, document to my attention corrections to the above referenced violations. Please note that I did not inspect your facility for compliance to the Financial Liability Requirements.

One additional concern remains. The facility's waste analysis plan needs to be better organized. The frequency of analysis of all waste streams was available for review in the Contingency Plan. This information should be removed from the Contingency Plan and added to the Waste Analysis Plan.

Even though we discussed all of these violations and concerns, please feel free to call me if you have any questions.

Sincerely,

Kris L. Coder

Kris L. Coder
Environmental Scientist
Division of Solid and Hazardous Management

Enclosures

KLC.wb

cc: Carolyn Reierson, CO, DSHWM

XERXES®
CORPORATION

FIELD INSPECTION REPORT

DATE OF INSPECTION: 10/7/92

CUSTOMER: WCI STEEL
1040 PINE AVE
WARREN, OHIO 44483-6528

PROJECT: INSPECTION OF #6 PKLR

CUSTOMER P.O. 346141.
XERXES CORP. S.O. 47925

CONTACTS AT SIGHT: STEVE HANUSCIN

REPORT CERTIFIED BY: David W. Kallay
DAVID W. KALLAY
XERXES CORPORATION
PRODUCT SERVICES MANAGER

AVON MANUFACTURING FACILITY/XERXES CORPORATION
34250 MILLS ROAD, AVON, OHIO 44011-2497
PHONE (216) 327-6061 FAX (216) 327-6071

OBSERVATIONS & MEASUREMENTS:

- Heil model 749-3 scrubber with two Heil model HCL-42 fans. Scrubber and south fan were purchased on Xerxes S. O. 36865 (1983), while north fan was replace on S. O. 45140 (1989). Original design specifications:

  gas volume: 30,000 cfm
  temperature: 180°F (max.)
  system (fan) static pressure: 6.75" wg
  scrubber once through liquid rate (top): 15 gpm
  scrubber both tray spray: 16 gpm @ 10 PSIG
  scrubber pressure drop: 4.0" wg

- Gas volume measured at the discharge of the north fan was 25,590 cfm with an average gas velocity of 2660 fpm. The duct diameter at the location of measurement is 42" ID (cross sectional area of duct 9.621 ft^2).

- Fan RPM was measured and found to be 965 rpm. The fan inlet static pressure plus the outlet static pressure is the system (fan) static pressure. The inlet pressure was approximately 7.0" wg, while the outlet pressure was 0.4" wg. The total system pressure is then 7.4" wg.

- The scrubber pressure drop is the difference in the scrubber inlet static pressure and the outlet static pressure. The inlet static pressure was 1.6" wg, while the outlet static pressure was 6.9" wg. The pressure drop across the scrubber is then 5.3" wg.

- The scrubber inlet gas temperature was measured to be 114°F, while the outlet temperature was 108°F.

- The following is a table of the hydrochloric acid fume concentrations measured:

TIME	INLET CONCEN. (PPM)	OUTLET CONCEN. (PPM)	EFFICIENCY (%)
10:30 AM	200	<0.5 ND	>99.75
10:40 AM	200	<0.5	99.75
10:50 AM	300	<0.5	99.83
11:15 AM	200	<0.5 ND	>99.75
11:30 AM*	200	1.0	99.50
11:40 PM*	200	0.5	99.75
11:50 PM*	200	<0.5 ND	>99.75
12:00 PM**	200	<0.5 ND	>99.75
12:10 PM**	200	<0.5 ND	>99.75

*-Bottom spray turned OFF
**-Bottom spray turned back on; ND-outlet concentration Not Detectable

- While bottom spray was operating, a pressure gauge measured the pressure at ~10 PSIG.

- The top water inlet had a liquid flow of between 15-16 gpm.

- New trays, 4-bend mist eliminator, and spool section were added to the scrubber since the inspection by Xerxes on August 8, 1992. Also, a new bottom section was added to the stack and a section of duct was added to the scrubber discharge duct. Four new 3" dia ports were added to the scrubber inlet duct work.

- The stack and scrubber drain piping have not been modified per our recommendations in the previous mentioned report.

- A small centrifugal pump was drawing the liquid out of the scrubber sump and stack drain and therefore liquid was not flowing out of the overflow stand pipe into the open drain next to the scrubber. There was liquid in the stand pipe slowly rising and falling by 1-2 inches. From the stand pipe it could be estimated that there was 10 to 12 inches of liquid in the scrubber sump.

- The original mist eliminator was found next to the scrubber and approximately 30-40% of the blades were broken or not usable. Also beside the scrubber was the tray material that was replaced. The perforated plates were in tacked but had deformed by 1-2".

- As in the first inspection, fume capture along the pickle tanks was excellent. A 3' long section of the pickle tank hoods was missing but no apparent fumes were escaping. The fumes were being drawn back under the hoods.

- The outboard bearing on the North fan was making a great deal of noise. The inboard bearing, the bearing nearest the impeller housing, was much less noisy.

CONCLUSIONS:

The reason for the scrubber systems lower then design gas flow starts with the fan is pulling or pushing the gas against a greater force then designed. The design force or system static pressure is 6.75" wg but the measured system pressure the fan works against is 7.4" wg. So the next question is were is the additional static pressure coming from? The likely answer is the scrubber. The design static pressure drop across the scrubber is 4" wg but it was measured to be 5.3" wg. The additional 1.3" wg pressure drop across the scrubber is reducing your air flow by ~14%. The lower air flow does not seem to be adversely affecting the systems ability to capture the acid fumes on the line. Changing the mist eliminator and having the correct amount of liquid on each tray may be the reason the air flow has decreased. Also the gas entering the scrubber on this day was slightly warmer. The warmer and the more liquid it carries the greater the system static pressure and thus the lower the air flow.

The expected removal efficiency of your scrubber for HCl using three trays is 98%. Presently the scrubber is operating just significantly higher then the expected efficiency. Replacing the trays and having the correct amount of liquid evenly distributed across them significantly increased the removal efficiency.

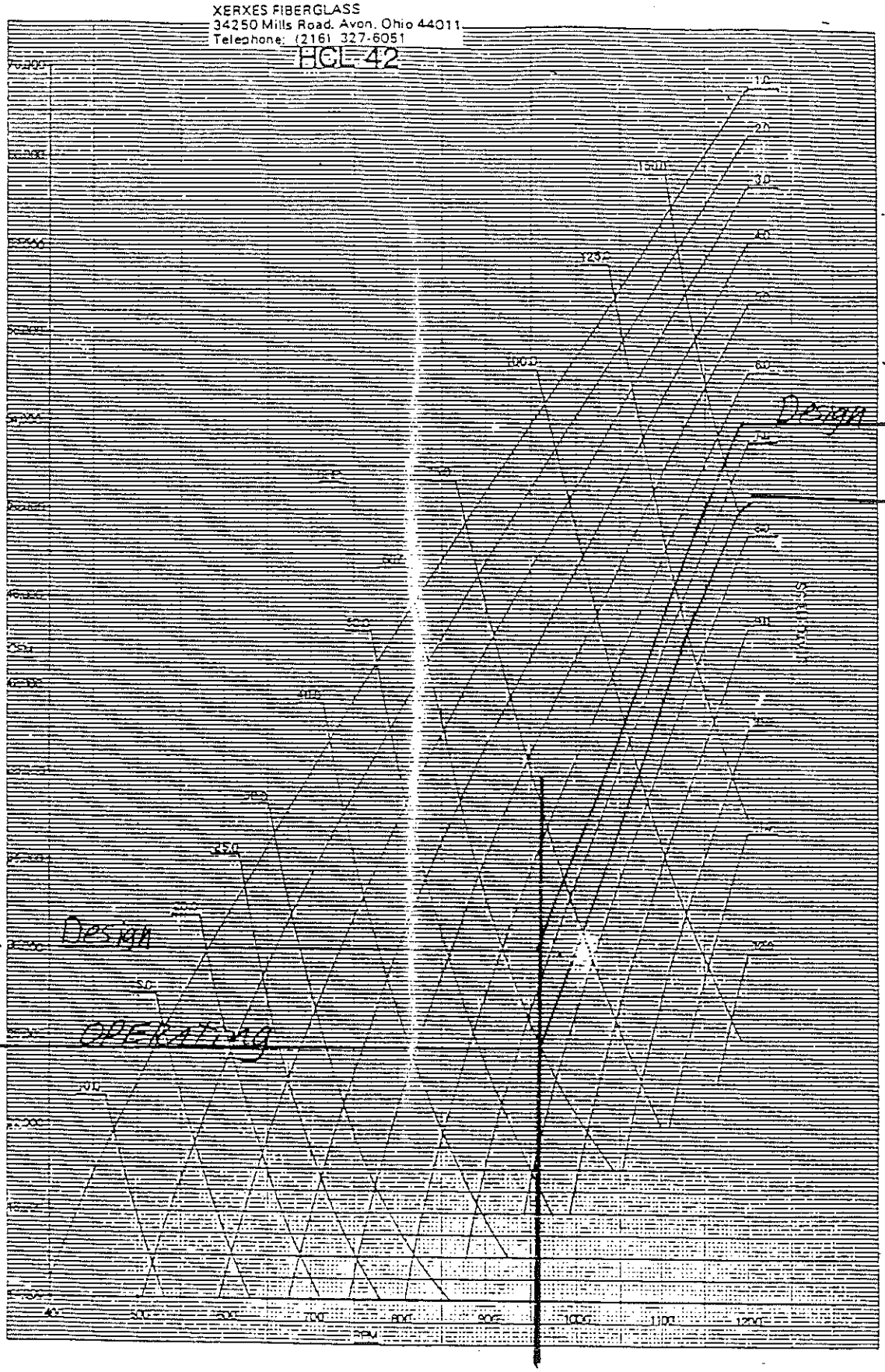
The scrubber had a very slight drop in removal efficiency when the bottom tray spray was turn off. It would be up to WCI if they what operate the scrubber with the spray on, since there is no significant difference if the spray is operating or not.

It will be very important to replace the outboard fan bearing before the bearing either deforms the fan shaft or burns up and locks up. The bearings have a great deal of grease at the greasing ports which suggests over greasing. The Dodge double interlock bearings only need 2 or 3 shots of grease every two weeks. The bearings will not last if they are over greased or under greased or greased infrequently with too much grease.

DIETZGEN CORPORATION

XERXES FIBERGLASS
34250 Mills Road, Avon, Ohio 44011
Telephone: (216) 327-6051

HCL-42



WCI-R 004019

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XERXES® CORPORATION

MATTHEW D. BIESTERVELD, E.I.T.
Applications Engineer

34250 Mills Road
Avon, Ohio 44011

(440) 327-6051
FAX (440) 327-7088

WCI Steel
Rolling & Finishing
Gate #1, Door #44
1040 Pine Ave. SE
Warren, Ohio 44483-6528
Attention: Mr. John Rinda

Fax: (330) 841-8625

Reference: #5 and #6 Pickle Line Fume Exhaust Scrubbers Testing

Dear Mr. Rinda:

Thank you for your interest in Xerxes Corporation / Heil Process Equipment engineering services and in our line of corrosion resistant equipment. Both #5 and #6 pickle line fume scrubbers were tested on September 29, 1997.

Data collected during testing included airflow, once-through liquid flow rate, inlet hydrochloric acid concentration, and outlet hydrochloric acid concentration. The average hydrochloric acid removal efficiency for #5 pickle line scrubber was 90% and the average hydrochloric acid removal efficiency for #6 pickle line scrubber was 80%. During our discussion following testing, it was noted that the new sieve trays had not been installed on #6 pickle line scrubber which may explain the dramatic reduction in efficiency. I recommended the upgrade to high density polypropylene or polyethylene to help prevent or reduce tray warping. Additionally, the volumetric airflows on both systems were slightly lower than the design capacity which would warrant an inspection of the fan impellers during the next shut down. Finally, a significant amount of moisture was noted at the discharge of both systems which would be a result of warn or damaged mist eliminators. I recommend upgrading to the 4-Bend style, if space permits, as opposed to the 2-Bend style. This will slightly increase pressure drop but will enhance mist removal.

If you have any questions or require further assistance, please do not hesitate to contact our sales office directly.

Best Regards,
Xerxes Corporation
Matt Biesterveld
Matt Biesterveld, E.I.T.
Applications Engineer

WCI Steel
#5 and #6 Pickle Line Fume Scrubber Testing
Performed By: Matt Biesterveld, Xerxes Corporation
Date: 9/29/97

Summary of Test Data - #5 Pickle Line Fume Scrubber

Sample	VP ("w.c.)	Airflow (CFM)	Water Rate (GPM)	Inlet HCl (PPM)	Outlet HCl (PPM)	Efficiency (%)
1	0.37	23,063	10.25	150	14	91
2	0.37	23,250	10.25	125	14	89
3	0.39	23,600	10.25	135	16	88
4	0.38	23,425	10.25	200	20	90
Ave.	0.38	23,335	10.25	153	16	90

Summary of Test Data - #6 Pickle Line Fume Scrubber

Sample	VP ("w.c.)	Airflow (CFM)	Water Rate (GPM)	Inlet HCl (PPM)	Outlet HCl (PPM)	Efficiency (%)
1	0.47	28,961	10.75	200	40	80
2	0.59	29,234	10.75	175	40	77
3	0.55	28,157	10.75	175	32	82
4	0.57	28,716	10.5	160	34	79
Ave.	0.55	28,767	10.69	178	36	80

RCRA INTERIM STATUS INSPECTION FORM

Facility Name: WARREN CONSOLIDATED INDUSTRIES INC. Date of Inspection 25 MAY 89 2 JUNE 89
Address: 1040 Pine Ave. SE HWFB #: 02-78-0184
WARREN OH 44483-6528 USEPA ID #: OHD 060-409-521
County: TRUMBULL Facility Phone #: (216) 841-8000

Facility Contact: THOMAS O. SHEPKER Facility Contact Phone#: (216) 841-8200
DAVID CALDERWOOD Safety Equipment #:
Inspector(s)Name(s): KRIS L. CODER

STATUS
Cond. Ex. SQG___ SQG___ Generator X Transporter___ Treatment___ Storage X Disposal X
ACTIVITIES
Containers___ Tanks X 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)?	Y	
2.	Are they :		
	a. Abandoned(disposed;incinerated;accumulated, stored, or treated prior to disposal)?	Y	STORED
	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/A	
	b. Burned for energy recovery?		
	c. Reclaimed? (Refer to Table 1 of 3745-51-02)		
	d. Accumulated speculatively?		
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?	N/A	
	b. Used as an effective substitute for commercial products?		
	c. Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock?		

		Y/N/NA	REMARK #
5.	Are LDR wastes generated? If so, complete appropriate LDR checklist.	Y	SEE ATTACHED
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	
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	
11.	Was advance notice of the inspection given? If so, how far in advance?	Y	1 WEEK

REMARKS. GENERAL INFORMATION.

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

FACILITY HAS WASTE PICKLE LIQUOR (HCL) STORAGE UNITS ON-SITE. NEW TANK UNITS AT THE GALVANIZED PICKLE LIQUOR LINE, 5 + 6 PICKLE LINES AND ACID REGENERATION PLANT. ALL TANKS ARE SECONDARILY CONTAINED. REGENERATION PLANT RECEIVES HCL FROM 5 + 6 PICKLERS AND FROM OFF-SITE FROM CLEVELAND LTD. SHIPS OFF-SITE HCL PICKLE LIQUOR AND TANK SLUDGES WHICH CANNOT BE REGENERATED TO MILL SERVICES IN PA. AND BY-PRODUCTS IN CLEVELAND. ALSO, GENERATES AND SHIPS OFF-SITE NAPTHA (D001) TO SAFETY-KLEEN. FACILITY HAS RETAINED AN UN-CLOSED COAL PILE (WASTE-PILE) WHICH STORED + DISPOSED K087. HAS NOT GENERATED ANY OILS CONTAMINATED WITH CHLORINATED COMPOUNDS SINCE THE LAST INSPECTION.

FACILITY HAS OTHER NON-HAZARDOUS WASTE STREAMS INCLUDING GALVANIZED BAGHOUSE DUST FROM THE GALVANIZING LINE (WHICH IS DISPOSED OFF-SITE); BOILER HOUSE BAG HOUSE: DISPOSED OFF-SITE TO BFI; THE ON-SITE LANDFILL RECEIVES BOF PRECIPITATOR DUST, AND WASTEWATER TREATMENT SLUDGE AND BOF FLIGHT CONVEYOR SLUDGE.

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	
4. Is the generator classified as a Small Quantity Generator (SQG) or conditionally exempt SQG? If so, complete appropriate checklist.	N	
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))?	Y	
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:	Y	
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)?	Y	
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)?	Y	
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	HAS PERMIT FOR STORAGE
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.	Y	SEE TANK INSPECTION
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?		
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?		
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?		
9. Has the genertor accumulated hazardous wastes in excess of ninety (90) days?	N	EVEN THOUGH PERMITTED TANKS ARE EMPTIED COMPLETELY EVERY 90 DAYS
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)	N	NEED TO PROVIDE DOCUMENTATION OF ALL TRAINING INCLUDING SUPERVISORS WHO ABSENT DURING TRAINING SESSION
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)	N	IN GALVANIZED TERN LINE AND DOCUMENTED TRAINING OF EMPLOYEES
14. Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41?	Y	OF REGER PLANT INCLUDING SUPT JOHN REED
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

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))?	Y	REV. NOV. 88
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	REV. NOV. 88
3. a.	Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1))	Y	
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 <u>and</u> 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.) inspected daily when in use and according to other applicable regulations when not in use. [3745-65-15(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))	N	SEE PREVIOUS COMMENTS IN GENERAL SECTION
9. If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17](265.17)	N/A	IGNITABLE WASTE NOT STORED
a. Protection from sources of ignition.		
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)		

OA 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?	Y	SPL PICKLE LIQUOR, INTO SECONDARY CONTAINMENT, REPORTED AS REQUIRED
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 associateed 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/A	All emergency authorities have indicated they will respond and these are part of the operating record

O/ 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?	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)] (265.51(f))?	Y	
2.	Is a copy of the Contingency Plan and any plan revisions 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? [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 REQ~
$UIREMENTS 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?	Y	
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))?	Y	

	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.	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?	Y	
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	

C. 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*	THE MAY 6, 1981 PLAN HAS BEEN REVISED TWICE. THE LATEST REVISION IS MAY 1985 SUBMITTED AS PART OF FACILITY'S PART B.
	a. A description of how each hazardous waste management unit will be closed in accordance with 265.11.		
	b. A description of how final closure will meet the requirements of 3745-66-11 (265.111).		
	c. An estimate of the maximum amount of hazardous waste 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 effects the closure plan? [3745-66-12(C)] (265.112(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/Regional Administrator 180 days prior to beginning the closure process or 45 days if only have tanks, container storage or incinerator? [3745-66-12(D)] (265.112(d))		
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))		

* A THOROUGH REVIEW OF THIS PLAN WAS NOT CONDUCTED AS PART OF THIS INSPECTION BUT WILL BE DONE AS PART OF THE TECHNICAL REVIEW FOR THE PART B. CLOSURE OF THE WASTE PILE (COAL PILE) IS UNDER THE EBR.

		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))	____	____
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))	____	____
7.	Did the onwer/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)	____	____
8.	What permitted units at the facility have been closed in accordance with an approved Closure Plan?	____	____
9.	If closure was partial, list the regulated units which remain in use at the faciilty: _____ _____		
10.	If required, has the facility prepared a written post-closure plan? [3745-66-18] (265.118)	____	____
11.	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] (265.119)	____	____

	Y/N/NA	REMARK #
13.~96Has 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 pursuant to 3745-66-17? [3745-66-10] (265.119)	_____	_____

O 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)	N	
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	
(2)	A run-on control system capable of handling a 24 hr, 25-yr storm has been implemented; and	N	
(3)	A run-off management system capable of controlling a 24 hr, 25-yr storm has been implemented; and	N	
(4)	Facilities associated with run-on and run-off control systems are managed to maintain design capacity after a rain event; or	N	
b. (1)	The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff; and	N	
(2)	No liquids or wastes containing free liquids are placed in the pile.	N/A	
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)	N/A	

* SEE PREVIOUS COMMENT CONCERNING CLOSURE OF WASTE PILE (CAL PILE)

3745-66 STORAGE AND TREATMENT IN TANKS (40 CFR PART 265, SUBPART J)

Applicability: This checklist applies to owners or operators of facilities that use tank systems for storing or treating hazardous waste.

Note: Tanks used to store or treat hazardous wastes containing no free liquids and that are inside a building with an impermeable floor, the Paint Filter Liquid Test must be used to confirm the absence or presence of liquids in the waste and tanks and sumps used as part of a secondary containment system are exempt from 3745-66-93 (265.193).

For generator who store wastes in tanks for less than 90 days use items 1-5, 18 and 22-25. Except that compliance with with 3745-66-97(C) (265.197) is not required.

		Y/N/NA	REMARK #
1.	For existing tank systems without secondary containment that meets 3745-66-93 (265.193) standards, does the owner/operator (o/o) have a written assessment on file at the facility that meets all of the following requirement? [3745-66-91(A)(B)] (265.191(a)(b))	N/A	
	a. It is certified by an independent Professional Engineer (P.E.).		
	b. Design standards have been considered.		
	c. The characteristics of hazardous waste(s) that have been or will be handled have been considered.		
	d. Corrosion protection measures have been considered.		
	e. The age of the tank system has been estimated or documented.		
	f. A leak test for non-enterable underground tanks has been conducted.		
	g. A leak test or an internal inspection by qualified P.E. has been conducted for other than non-enterable underground tanks.		
2.	For tanks 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)] (265.191(c))	N/A	

	Y/N/NA	REMARK #
3. For all tanks found to be leaking or unfit for use as a result of the assessment the o/o has complied with 3745-66-96 265.196 [3745-66-91(D)] (265.191(d))	N/A	
4. For new tank systems, has the o/o obtained a written assessment certified by an independent qualified P.E. that includes all of the following? [3745-66-92(A)] (265.192(a))		
a. Design standards	Y	
b. The characteristics of hazardous waste to be stored or treated	Y	
c. Corrosion protection	Y	
d. Protection from vehicular traffic	Y	
e. Adequacy of tank foundation, proper anchoring and effects of front leave.	Y	
5. 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, designed and that required repairs were performed [3745-66-92(G)] (265.192(g)). Does the statement address all of the following:		
a. Inspection for damage and/or inadequate construction and installation and a statement that deficiencies were corrected before the tank system was covered or put into use. [3745-66-92(B)] (265.192(b))	Y	
b. Proper backfilling; [3745-66-92(C)] (265.192(c))	N/A	
c. Tightness test, if the tank was found not to be tight proper repairs were made; [3745-66-92(D)] (265.192(d))	Y	
d. Proper support and protection of auxiliary equipment; [3745-66-92(E)] (265.192(e))	Y	
e. Supervision of the installation of field fabricated corrosion protection. [3745-66-92(F)] (265.192(f))	Y	

	Y/N/NA	REMARK #
6. Has the o/o obtained a variance from the secondary containment requirements of 3745-66-93 (265.193) from the (Regional Director) (Administrator). If yes, skip items 7 through 11.	N/A	
7. Has the o/o installed secondary containment which meets the requirements of 3745-65-93 (265.193) for each of the following classes of tank systems by the date specified. [3745-66-93(A)] (265.193)		
a. For all new tank systems prior to being put into service	N/A	
b. For all existing tanks used to handle waste No.'s F020, F021, F022, F023, F026, F027, before January 12, 1989.		
c. For existing tank system of known and documentable age, the later of January 12, 1989, or when the tank reaches 15 years of age.		
d. For existing tank systems of undocumentable age, by January 12, 1995 unless the facility is greater than seven years old before the facility is fifteen years old.		
e. For tank systems used to handle materials that became hazardous wastes after January 12, 1987, within the time frames required in (a) and (b) above, except that the date the material becomes a hazardous waste plus two years must be substituted for January 12, 1989.		
8. Was the secondary containment system(s) at the facility designed, installed and is operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulted liquids. [3745-66-93(B)] (265.193(b))	Y	

	Y/N/NA	REMARK #
9. Does the secondary containment system meet the following minimum requirements of 3745-66-93(C)] (265.193(c)):		
a. It is constructed or lined with compatible materials with sufficient strength to prevent failure.	Y	
b. It is placed on a foundation or base capable of providing support.	Y	
c. A leak detection system that is designed/operated to detect failure of primary or secondary containment or any release of hazardous waste in the secondary containment system within 24 hours or at earliest practicable time is provided.	Y	VISUAL INSPECTION
d. It is sloped or designed to drain and remove liquid, liquid (including accumulated precipitation) is removed within 24 hours or in a timely manner.	Y	
10. Is the secondary containment system for tanks a liner (external to the tank), vault, double-walled tank or an equivalent device approved by the Director/Regional Administrator?	Y	
a. External Liner		
1. Is the external liner designed and operated to contain 100% of the capacity of the largest tank?	Y	REGEN PLANT TANK FARM ONLY
2. Is the external liner designed and operated to prevent run-off and infiltration into the liner; or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	Y	
3. Is the external liner free of cracks and gaps?	Y	
4. Does the external liner completely surround the tank and cover all earth likely to be contacted by waste during release?	Y	

	Y/N/NA	REMARK #
b. Vault System		
1. Is the vault system designed and operated to contain 100% of the capacity of the largest tank?	Y	
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?	Y	
3. Are chemically resistant water stops in place at all joints?	Y	
4. Is there a compatible interior coating or lining to prevent migration of waste into the concrete?	Y	ACID BRICK LINED.
5. If ignitable or reactive waste is being managed, is the vault system provided with a means to prevent formation or ignition of vapors?	P/K	TANK FARM AT ACID
6. Is the vault system provided with an exterior moisture barrier?	N/A	REGEN HAS BITUMIC COATING.
c. Doubled-Walled Tank		
1. Is the doubled-walled tank designed as an integral structure so any release from the inner tank is contained?	N/A	
2. If metal, are the primary tank interior and outer shell exterior surfaces protected from corrosion?		
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?		
11. Is ancillary equipment provided secondary containment and inspection daily (except above ground piping)?	N	NEED DAILY INSPECTION DOCUMENTED. REVISE INSP. LOG.

	Y/N/NA	REMARK #
12. For tank systems for which secondary containment is not yet provided, does the o/o have on file at the facility a record of the following:		
a. For non-enterable underground tanks, a leak test conducted at least annually.	N/A	
b. For all other tanks, an annual leak test or internal inspection by an independent P.E., and		
c. For tank systems found to be leaking or unfil for use as a result of the above tests or inspections, thas the o/o complied with 3745-66-96 (265.196)? If no, this is a violation of [3745-66-93(I)(4)] (265.193(i)(4))		
13. Has the o/o of a tank system with a variance from secondary containment at which a release of hazardous waste has occurred from the tank but has not migrated beyond the zone of engineering control complied with 3745-66-96(A)(B)(C)(E)(F) and 265.196 (a)(b)(c)(e) and (f) decontaminated or removed contaminated soil. If soil cannot be removed, has the tank been closed?	N/A	
14. Has the o/o of a tank system with a variance from secondary containment at which a release of hazardous waste has occurred from the tank and has migrated from the zone of engineering control complied with 3745-66-96(A)(B)(C) and (D) (265.196 (a)(b)(c) and (d) and 3745-66-93(G)(4)(b) and (c) and (265.193(g)(4)(b) and (c)?	N/A	
15. Has the o/o complied with the following for all tank systems until secondary containment is provided? [3745-66-93(I)] (265.193(i))		
a. Non-enterable underground tanks have had an annual leak test?	N/A	
b. All other tanks have had an annual leak test or an internal inspection?	N/A	

		Y/N/NA	REMARK #
16.	Does the o/o have on file at the facility a results of the assessments in No. 15? [3745-66-93(I)(3)] (265.93(i)(3))	N/A	
17.	For tanks found to be leaking as a result of assessment in 3745-66-93(I)(1) through (3) (265 (i)(1) through (i)(3)), has the o/o complied with 3745-66-96 (265.196); [3745-66-93(I)(4)] (265.93(i)(4)	N/A	
18.	Does the o/o follow the general operating requirements below: [3745-66-94] (265.94)		
	a. Hazardous waste treatment reagents are not placed in the tank or secondary containment if they can cause the system to leak, rupture, corrode, or otherwise fail.	N/A	
	b. The o/o uses appropriate controls to prevent spills or overflows from the system.	Y	
	c. The o/o has complied with 3745-66-96 (265.196) when a leak or spill has occurred.	Y	REPORTED + MADE CORRECTION
19.	Has the o/o documented the inspection required in 3745-66-95 (265.195), in the operating record of the facility, including the following:		
	a. Spill control equipment (daily).	N	NEEDS TO DOCUMENT
	b. Above ground portion of the tank (daily).	N	THESE INSP.
	c. Data from leak detection equipment (daily).	N/A	DAILY +
	d. Construction materials and the immediate area surrounding the tank to detect signs of erosion or signs of releases of hazardous waste (daily).	N	REVISE INSPECTION LOG:
	e. The cathodic protection system to confirm its proper operation within six months of its initial installation and annually thereafter.	N/A	
	f. All sources of impressed current at least bi-monthly.	N/A	

	Y/N/NA	REMARK #
20. Response to leaks or spills and disposition of leaking or unfit for use tanks. Has the o/o of a tank system or secondary containment system from which there has been a leak or spill or which is unfit for use removed the tank from service and satisfied the following requirements. 3745-66-96 (265.196)		
a. Immediately ceased flow into tank and investigated cause of release	N/A	NO TANKS HAVE BEEN REMOVED
b. For release from tank system, removed waste to prevent further release within 24 hours of detection or earliest practicable time.	Y	
c. For releases to a secondary containment system removed all released material within 24 hours or as timely as possible to prevent harm to human health and the environment.	Y	TIMELY AS POSSIBLE
d. Immediately conducted a visual inspection of the release and prevented further migration and removed and disposed of any visible contamination of soil or surface water.	Y	
e. Reported any release to the environment to the Director (Regional Administrator) within 24 hours unless it is less than 1 lb. and was cleaned up immediately.	Y	
f. Submitted a report within 30 days of the release to Director (Regional Administrator).	Y	
21. Has the o/o closed the tank system or have the following requirements been satisfied: 3745-66-96(E)(1) (265.196(e)(1)		
a. The cause of the release was a spill which did not damage the tank system and the o/o returned the system to service.	N/A	
b. The cause of the release was a leak from the primary tank and the system was repaired and returned to service.		
c. If the source of the release was a leak from a component without secondary containment the component was provided with secondary containment or visually inspected above ground.		

	Y/N/NA	REMARK #
d. The o/o has obtained certification from an independent P.E. if the repairs were major (i.e., installation of liner, repair of ruptured primary or secondary containment vessel).	N/A	
22. Has the o/o completed closure of the tank system in accordance with 3745-66-97 (265.197)?	N/A	
23. 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)] (265.198(a))		
a. The waste is treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o complied with 3745-65-17(B) (265.17(b)); or	N/A	
b. The waste is stored or treated to protect it from materials or conditions which may cause ignition or reaction; or		
c. The tank is used solely for emergencies.		
24. If ignitable or reactive waste is stored or treated is it stored or treated in compliance with the NFPA flammable and combustible code (1971 or 1981)? [3745-65-17(B) (265.17(b)) is complied with?	N/A	
25. Has the o/o not 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 unless 3745-65-17(B) (265.17(b)) is complied with? [3745-66-99] (265.199)	N/A	
26. In addition to conducting the waste analysis required by 3745-65-13 (165.13) 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: [3745-66-99] (265.200)		
a. Conducted waste analysis and trial treatment storage tests.	N/A	
b. Obtained written documentation or similar waste under similar operating conditions.		

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: WARREN CONSOLIDATED INDUSTRIES, INC.

U.S. EPA I.D. No.: OHD 060-409-521

Street: 1040 PINE AVE. S.E.

City: WARREN State: OH Zip Code: 44483-6528

Telephone: (216) 841-8200

Operator: SAME AS ABOVE

Street:

City: State: Zip Code:

Telephone:

Owner: SAME AS ABOVE

Street:

City: State: Zip Code:

Telephone:

Inspection Date: 2 JULY 89 Time: 8:30 Weather Conditions: FAIR

	Name	Affiliation	Telephone
Inspectors:	KRIS L. CODER	OEPA	(216) 425-9171

Facility Representatives:

	RCRA Status	F-Solvent	LDR Status California List	First Third
Generator			X	X
Transporter				
Treater				
Storer			X	X
Disposer				

Revised 9-26-88

INSPECTION SUMMARY

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	F-Solvent Wastes N/A					
1.	F001	____	____	____	____	____
2.	F002	____	____	____	____	____
3.	F003	____	____	____	____	____
4.	F004	____	____	____	____	____
5.	F005	____	____	____	____	____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified N/A

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	____	____	____	____	____
Cadmium	100 mg/L	____	____	____	____	____
Chromium VI	500 mg/L	____	____	____	____	____
Lead	500 mg/L	____	____	____	____	____
Mercury	20 mg/L	____	____	____	____	____
Nickel	134 mg/L	____	____	____	____	____
Selenium	100 mg/L	____	____	____	____	____
Thallium	130 mg/L	____	____	____	____	____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.	
____	____	____	____	____	N/A

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

X	____	X	____	____

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to N/A

50 ppm	____	____	____	____	____
500 ppm	____	____	____	____	____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

____ Yes ____ No ____ NA

If yes, state reasons for mixing:

_____

_____

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids) N/A

____	____	____	____	____

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes

Note: (1) The detailed description for waste codes are listed in Appendix C.
(2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*	____	____	____	____	____
F007	____	____	____	____	____
F008	____	____	____	____	____
F009	____	____	____	____	____
F019	____	____	____	____	____
K001*	____	____	____	____	____
K004*	____	____	____	____	____
K008*	____	____	____	____	____
K011	____	____	____	____	____
K013	____	____	____	____	____
K014	____	____	____	____	____
K015*	____	____	____	____	____
K016*	____	____	____	____	____
K017	____	____	____	____	____
K018*	____	____	____	____	____
K019*	____	____	____	____	____
K020*	____	____	____	____	____
K021*	____	____	____	____	____
K022*	____	____	____	____	____
K024*	____	____	____	____	____
K025*	____	____	____	____	____
K030*	____	____	____	____	____
K031	____	____	____	____	____
K035	____	____	____	____	____
K036*	____	____	____	____	____
K037*	____	____	____	____	____
K044*	____	____	____	____	____
K045*	____	____	____	____	____
K046*	____	____	____	____	____

	Gen.	Treat	Store	Disp.	Trans.
K047*					
K048*					
K049*					
K050*					
K051*					
K052*					
K060*					
K061*					
K062*	X		X		
K069*					
K071*					
K073*					
K083*					
K084					
K085					
K086*					
K087*					
K099*					
K100*					
K101*					
K102*					
K103*					
K104*					
K106*					
P001					
P004					
P005					
P010					
P011					
P012					
P015					
P016					
P018					

	Gen.	Treat	Store	Disp.	Trans.
P020	____	____	____	____	____
P030	____	____	____	____	____
P036	____	____	____	____	____
P037	____	____	____	____	____
P039	____	____	____	____	____
P041	____	____	____	____	____
P048	____	____	____	____	____
P050	____	____	____	____	____
P058	____	____	____	____	____
P059	____	____	____	____	____
P063	____	____	____	____	____
P068	____	____	____	____	____
P069	____	____	____	____	____
P070	____	____	____	____	____
P071	____	____	____	____	____
P081	____	____	____	____	____
P082	____	____	____	____	____
P084	____	____	____	____	____
P087	____	____	____	____	____
P089	____	____	____	____	____
P092	____	____	____	____	____
P094	____	____	____	____	____
P097	____	____	____	____	____
P102	____	____	____	____	____
P105	____	____	____	____	____
P108	____	____	____	____	____
P110	____	____	____	____	____
P115	____	____	____	____	____
P120	____	____	____	____	____
P122	____	____	____	____	____
P123	____	____	____	____	____
U007	____	____	____	____	____
U009	____	____	____	____	____

	Gen.	Treat	Store	Disp.	Trans.
U010	____	____	____	____	____
U012	____	____	____	____	____
U016	____	____	____	____	____
U018	____	____	____	____	____
U019	____	____	____	____	____
U022	____	____	____	____	____
U029	____	____	____	____	____
U031	____	____	____	____	____
U036	____	____	____	____	____
U037	____	____	____	____	____
U041	____	____	____	____	____
U043	____	____	____	____	____
U044	____	____	____	____	____
U046	____	____	____	____	____
U050	____	____	____	____	____
U051	____	____	____	____	____
U053	____	____	____	____	____
U061	____	____	____	____	____
U063	____	____	____	____	____
U064	____	____	____	____	____
U066	____	____	____	____	____
U067	____	____	____	____	____
U074	____	____	____	____	____
U077	____	____	____	____	____
U078	____	____	____	____	____
U086	____	____	____	____	____
U089	____	____	____	____	____
U103	____	____	____	____	____
U105	____	____	____	____	____
U108	____	____	____	____	____
U115	____	____	____	____	____
U122	____	____	____	____	____
U124	____	____	____	____	____

	Gen.	Treat	Store	Disp.	APP Trans.
U129	____	____	____	____	____
U130	____	____	____	____	____
U133	____	____	____	____	____
U134	____	____	____	____	____
U137	____	____	____	____	____
U151	____	____	____	____	____
U154	____	____	____	____	____
U155	____	____	____	____	____
U157	____	____	____	____	____
U158	____	____	____	____	____
U159	____	____	____	____	____
U171	____	____	____	____	____
U177	____	____	____	____	____
U180	____	____	____	____	____
U185	____	____	____	____	____
U188	____	____	____	____	____
U192	____	____	____	____	____
U200	____	____	____	____	____
U209	____	____	____	____	____
U210	____	____	____	____	____
U211	____	____	____	____	____
U219	____	____	____	____	____
U220	____	____	____	____	____
U221	____	____	____	____	____
U223	____	____	____	____	____
U226	____	____	____	____	____
U227	____	____	____	____	____
U228	____	____	____	____	____
U237	____	____	____	____	____
U238	____	____	____	____	____
U248	____	____	____	____	____
U249	____	____	____	____	____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

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

   ____ Yes ____ No ✓ NA

   If yes, check the appropriate treatability group.

   ____ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
   ____ Pharmaceutical wastewater containing spent methylene chloride
   ____ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

   a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

      ____ Yes ____ No ✓ NA

      If yes, specify the method: _____

   b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

      ____ Yes ____ No ✓ NA

      If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

      _____
      _____
      _____

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

✓ Yes ____ No ____ NA

If yes, check the appropriate treatability group.

____ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
✓ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
K062		✓

B. Waste Analysis

1. F-Solvent Wastes N/A

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

____ Yes ____ No ____ NA

How was this determination made?

- Knowledge of waste

____ Yes ____ No

If yes, is any supporting data available for review? Describe how this is adequate.____

- TCLP

____ Yes ____ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

____ Yes ____ No ____ NA

If yes, specify the waste stream: _____

c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No ____ NA

d. How does the generator test F-solvent waste when a process or waste stream changes?

_____

_____

_____

2. California List Wastes

a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

____ Yes ✓ No ____ NA (IT IS A LIQUID)

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

____ Yes ✓ No ____ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

___ Liquid hazardous waste having a pH less than or equal to 2

___ Liquid hazardous waste containing metals

___ Liquid hazardous waste containing free cyanides

c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

✓ Yes ____ No ____ NA

If yes, is any supporting data available for review? Describe how this is adequate. SEMI ANNUAL WASTESTREAM ANALYSIS

- Testing ✓ Yes ____ No ____ NA

If yes, list test method used: E.P. TOXIC, pH - S150-NU

d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

____ Yes ____ No ✓ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: ____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ✓ No ____ NA

3. First Third Wastes:

a. Does the generator correctly determine the appropriate treatment standard of the waste?

✓ Yes ____ No ____ NA

Note: The treatment standards for first third wastes are given in Appendix D.

b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

✓ Yes ____ No ____ Soft hammer

If yes, specify the waste stream: K062

How was this determination made?

- Knowledge of waste

✓ Yes ____ No

If yes, is any supporting data available for review? Describe how this is adequate. SEMIANNUAL WASTESTREAM ANALYSIS

- TCLP

  ✓ Yes ____ No ____ NA

  LATEST ANALYSES WILL INCLUDE TCLP - RESULTS ARE PENDING.

- Total Constituent Analysis

  ✓ Yes ____ No ____ NA

  Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

  FREQUENCY OF TEST SEMI-ANNUAL, SAMPLED DECEMBER 31, 1988 (E.P. TOXIC.) APRIL 17th SAMPLE FOR TCLP IS PENDING.

c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

   ____ Yes ✓ No ____ NA

d. How does the generator test the waste when a process or waste stream changes?

   SEND OUT FOR ANALYSIS. ANALYSIS IS DONE ROUTINELY SEMI-ANNUAL. IF A WASTESTREAM CHANGES OR IS THOUGHT TO CHANGE ANALYSIS IS DONE REGARDLESS

C. Management

1. On-Site Management

   Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

   ✓ Yes ____ No

   If yes, the TSD Checklist must be completed.

2. Off-Site Management

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

      ✓ Yes ____ No

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

      ✓ Yes ____ No

c. Does notification contain the following?

EPA Hazardous waste number(s)	✓ Yes	____ No
Applicable treatment standards	✓ Yes	____ No
Manifest number	✓ Yes	____ No
Waste analysis data, if available	✓ Yes	____ No NOT OF INDIVIDUAL SHIPMENTS

Identify off-site treatment or storage facilities: MILL SERVICES, BY-PRODUCTS MANAGEMENT

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

____ Yes ✓ No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]? N/A

____ Yes ____ No

f. Does notification contain the following? N/A

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets treatment standards	____ Yes	____ No

Identify off-site land disposal facilities: _____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

____ Yes ____ No ✓ NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

____ Yes ____ No N/A

i. If yes, does the notification contain the following information?

EPA Hazardous waste number	____ Yes	____ No	N/A
The corresponding treatment standards and all applicable prohibitions	____ Yes	____ No	
Manifest number	____ Yes	____ No	
Waste analysis data, if available	____ Yes	____ No	
Date the waste is subject to the prohibitions	____ Yes	____ No	

j. Does the generator retain copies of all notices and certifications for a period of 5 years?

____ Yes ____ No N/A

D. <u>Demonstration and Certification -- "Soft Hammer" Wastes</u> N/A

a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

____ Yes ____ No

b. Has the generator submitted to the Regional Adminstration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?	____ Yes	____ No
Addresses	____ Yes	____ No
Telephone Numbers	____ Yes	____ No
Contact dates	____ Yes	____ No

Attach a copy of the demonstration and certification

c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

____ Yes ____ No

If yes, attach a copy of written discussion.

d. Does the generator ship his waste off-site for treatment?

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

_____

_____

e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

_____ Yes _____ No

f. Does the generator provide certification with each subsequent shipment of wastes?

_____ Yes _____ No

g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i)	EPA Hazardous waste number	_____ Yes	_____ No
(ii)	Manifest number	_____ Yes	_____ No
(iii)	Waste analysis data, if available	_____ Yes	_____ No

h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

_____ Yes _____ No

E. <u>Treatment Using RCRA 264/265 Exempt Units or Processes</u> N/A
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ Yes _____No

If yes, list types of waste treatment units and processes:

_____

_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS N/A

A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

_____ Yes _____ No

If yes, check the appropriate regulatory status:
_____ Interim status for storage
_____ RCRA permit for storage

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

B. Does the transporter mix, combine, or recontainerize wastes?

_____ Yes _____ No

C. Is the waste treated in an exempt treatment process on-site?

_____ Yes _____ No

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent	____ Yes	____ No	✓ NA
o California List	✓ Yes	____ No	____ NA
o First Third	✓ Yes	____ No	____ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

✓ Yes ____ No

a. What date was the waste analysis plan last revised? NOV. 88

b. Are analyses conducted on-site or off-site?

____ On-site ✓ Off-site

Identify off-site lab: NUS, KEYSTONE

c. Is F-solvent waste analyzed using TCLP?

____ Yes ____ No ✓ NA

d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

✓ Yes ____ No ____ NA

Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

e. Describe the frequency of sampling: SEMI ANNUAL

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

✓ Yes ____ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

✓ Yes ____ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

✓ Tanks
____ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

____ Yes ____ No ✓ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

✓ Yes ____ No

5. Do operating records agree with container labeling?

✓ Yes ____ No ✓ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

✓ Yes ____ No

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

____ Yes ✓ No ____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

____ Yes ____ No

If yes, state how: _____

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

✓ Yes ____ No ____ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

✓ Yes ____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

✓ Yes ____ No ____ NA

C. <u>Treatment</u>

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

____ Yes ____ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

_____

_____

_____

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

_____ Yes _____ No

4. Is dilution used as a substitute for treatment?

_____ Yes _____ No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

_____ Yes _____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets the treatment standards	_____ Yes	_____ No

Identify off-site disposal facilities: _____

_____

_____

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

_____ Yes _____ No

D. Treatment in Surface Impoundments N/A

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

_____ Yes _____ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

_____ Yes _____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____ Yes _____ No _____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

_____ Yes _____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

_____ Yes _____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

_____

_____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

a. If yes, are sludge and supernatant removed adequately on an annual basis?

_____ Yes _____ No

b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

_____

_____

E. Land Disposal N/A

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

_____ Yes _____ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

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

_____

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

_____ Yes _____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

_____ Yes _____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

_____ Yes _____ No

If yes, at what frequency? _____

_____

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

_____ Yes _____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

_____ Yes _____ No

7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

____ Yes ____ No ____ NA

8. What is the volume of the restricted wastes disposed of to date?

_____

_____

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

____ Yes ____ No ____ NA

19 MAY 87 9:30 A.M.
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # 02-78-0184

U.S. EPA I.D. # OHD 060-409-521

GENERAL INFORMATION

Facility: LTV STEEL COMPANY WARREN WORKS Address: 1050 PINE ST. S.E. City: WARREN

State: OH Zip Code: 44481 County: TRUMBULL Telephone: (216) 841-8200

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	ROBERT J. LANNON	MGR. ENVIRONMENTAL CONTROL	(216) 841-8200
2.	DAVE CALDERWOOD	ENVIRONMENTAL ENGINEER	(216) 841-8201
3.	JOHN M. POTWORA	ENVIRONMENTAL MANAGEMENT ENGINEER	(216) 429-6536

INSPECTOR(S)

1.	KRIS CODER	ENVIRONMENTAL SCIENTIST	(216) 425-9171
2.			
3.			

INSTALLATION ACTIVITY

Mark One

- [ ] Generator only (G)
- [ ] Transporter (T)
- [ ] TSDF only
- [ ] G-T
- [ ] G-TSDF
- [ ] T-TSDF
- [x] 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
- [x] 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
- [x] Post-Closure LAND DISPOSAL RESTRICTION

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RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
1. Has the facility submitted a Part A to Ohio?	✓			SUBMITTED NAME CHANGE 17 MAR.
2. If "yes", is it complete and accurate?		✓		
3. Has the facility submitted a Part B?		✓		
4. Was advance notice of the inspection given? If so, how far in advance?	✓			3 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.

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)]	✓			
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)?	✓			RECYCLE OF COAL TAR DECANTER SLUDGE TO AKJ PROCESS
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]		✓		
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].	✓			CURRENTLY USE MOST UP TO DATE MANIFEST
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)].	✓			
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)].	✓			
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].	✓			
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)]	✓			

	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]	✓			
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].	✓			
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].	✓			
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]			✓	
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".	✓			
b) The date that accumulation began is clearly marked on each container.	✓			
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)]	✓			
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)].	✓			

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

RCRA INTERIM STATUS INSPECTION FORM

REGISTERED WITH USC
NOT PUCO - DOES NOT TRANSPORT.

40 CFR 263 (OAC 3745-53) TRANSPORTER REQUIREMENTS

	Yes	No	N/A	Remark #
1. The entity has registered with the Public Utilities Commission of Ohio as a transporter of hazardous waste. [3745-53-11]	___	___	___	_____
2. The transporter has accepted hazardous wastes for transport only when the waste was accompanied by a manifest prepared by the generator in accordance with Section 262 [3745-53-20(A)]	___	___	___	_____
3. The transporter has signed the manifest as required by Section 263.20(b) [3745-53-20(B)] and has carried the manifest with the waste shipment as required by Section 263.20(c) [3745-53-20(C)].	___	___	___	_____
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20(d) [3745-53-20(D)(1)] and has retained a signed copy (available for inspection) for at least 3 years (263.22(a)) [3745-53-22(A)].	___	___	___	_____
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21) [3745-53-21(A)(B)].	___	___	___	_____
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Section 263.20(e)(f) [3745-53-20(E)(F)].	___	___	___	_____
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) [3745-53-22(D)].	___	___	___	_____
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?	___	___	___	_____
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30(a)) [3745-53-30(A)]	___	___	___	_____

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	Yes	No	N/A	Remark #
b) Were all of the notifications required by Section 263.30(c)(d) [3745-53-20(C)] made?	___	___	___	_____
c) Was the discharge cleaned up as required by Section 263.13 [3745-53-31]?	___	___	___	_____
9. Does the transporter store hazardous waste temporarily while they are in transit?	___	___	___	_____
a) Manifested wastes are stored for 10 days or less ("Transfer Facility") and remain properly DOT-packaged during storage (263.12) [3745-53-12]	___	___	___	_____

NOTE: TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12 [3745-53-12], TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.

10. Does the transporter import hazardous waste into the United States?	___	___	___	_____
11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?	___	___	___	_____

NOTE: A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTION 263.10(c) [3745-53-10(C)] BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTION 262 [3745-52].

REMARKS, TRANSPORTER REQUIREMENTS

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)]		✓		UP-DATE ANALYSIS ON #'S 5 + 6 PICKLER'S AND COAL TAR SLUDGE
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)]		✓		INCLUDE FREQ OF ANALYSIS TO EACH WASTE STREAM
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)]	✓			
b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]	✓			
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	✓			
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)]	✓			
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)]	✓			

	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]	✓			
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)]	✓			
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)]	✓			ADDED NEW H.W. TRAINING FORMAT IN ADDITION TO REGULAR D.M
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)]	✓			
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.	✓			
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) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)]	✓			

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]		✓		
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.	✓			
b) Access to telephone, radio or other device for summoning emergency assistance.	✓			
c) Portable fire control equipment.	✓			
d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers.	✓			
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33]	✓			
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]	✓			
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]	✓			
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)]	✓			
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)]			✓	

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.	✓			
b) Arrangements or agreements with local or state emergency authorities.	✓			
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	✓			
d) A list of all emergency equipment including location, physical description and outline of capabilities.	✓			
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)]	✓			
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)]	✓			
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54]	✓			
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]	✓			
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)			✓	

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)]	✓			
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	✓			
c) The estimated (or actual) weight, volume or density of the waste material(s).	✓			
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).	✓			
e) The present physical location of each hazardous waste within the facility.	✓			
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)]			✓	
g) Records of any waste analyses and trial tests required to be performed.	✓			
h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).	✓			
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)]			✓	
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.	✓			

	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]	✓			

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)	✓			
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)]	✓			
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)]	✓			
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)]	✓			
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)]	✓			

RCRA INTERIM STATUS INSPECTION FORM

Subpart G: Closure and Post-Closure*

PROCEEDING REVIEW AND COMMENT PERTAIN TO ONLY THE "CLOSU PLAN FOR SPENT PICKLE LIQUOR AND DECANTE TANK TAR SLUDGE STR FACILITIES (SEPT. 198

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]	✓			
a) A description of how and when the facility will be closed. (265.112(a)(1)) [3745-66-12(A)(1)]	✓			
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.	✓			
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.)	✓			
d) A description of steps taken to decontaminate facility equipment.	✓			
e) The year closure is expected to begin and a schedule for the various phases of closure.	✓			
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)]			✓	
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)]			✓	

*SEPTEMBER 1986 CLOSURE PLAN SUBMITTED TO COMPLY WITH 40 CFR 265 SUBPART G AND OAC 3745-66. PLAN ADDRESSES CLOSURE OF GALVANIZING-LINE TANK, MAIN PICKLING LINE TANK, ACID REGENERATION STORAGE TANKS, AND DECANTER TANK TAR SLUDGE CONTAINERS. THIS PLAN, HOWEVER, DOES NOT ADDRESS RCRA CLOSURE OF THE WASTE PILE STORAGE AREA (COAL PILE) WHICH IS BEING ADDRESSED THROUGH APPEAL TO THE ENVIRONMENTAL BOARD OF REVIEW (EBR).

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
Subpart H: Financial Requirements **				
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]				
a) A closure trust fund, or	—	—	—	—
b) A surety bond, or	—	—	—	—
c) A closure letter of credit, or	—	—	—	—
d) A combination of financial mechanisms.	—	—	—	—
2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?	✓	—	—	$228,700 *
3. When was the most recent estimate made?	✓	—	—	1986 Estimate
4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?	—	—	—	—
5. When was the most recent estimate made?	—	—	—	—

REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

* COST ESTIMATE DOES NOT INCLUDE CLOSURE COST, POST-CLOSURE COST FOR CLOSURE OF WASTE PILE. COST ESTIMATE IS REFLECTED IN "CLOSURE PLAN FOR SPENT PICKLE LIQUOR AND DECANTER TANK TAR SLUDGE STORAGE FACILITIES" SEPT. 1986.

** FACILITY CURRENTLY UNABLE TO OBTAIN LIABILITY COVERAGE AS PART OF FINANCIAL REQUIREMENTS. ON MAY 15, 1987, DIRECTOR OF OEPA ISSUED ORDERS TO THE FACILITY TO DOCUMENT COMPLIANCE WITH OAC 3745-66-47 WITHIN 150 DAYS FROM THE EFFECTIVE DATE OF THE FNO'S.

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)]	✓			
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 J: Storage in Tanks

	Yes	No	N/A	Remark #
1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17 and 265.192(b) [3745-66-92(B)] and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192(d) [3745-66-92(D)].			✓	
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide. (265.192(c)) [3745-66-92(C)]	✓			
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard. (265.194) [3745-66-94(A)(B)(C)]	✓			
4. Weekly inspections are made of all tank construction materials and containment structures. (265.194) [3745-66-94(D)(E)]	✓			
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (265.193(a)) [3745-66-93(A)(B)]				
a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.			✓	
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.			✓	

	Yes	No	N/A	Remark #
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods: (265-198(a)) [3745-66-98(A)]				
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b) [3745-65-17(B)].			✓	
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.			✓	
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code 1977). (265.198(b)) [3745-66-98(B)]			✓	
8. Incompatible waste materials are placed in the same tanks or put in contaminated tanks only under completely controlled and safe conditions as specified in Section 265.17(b). (265.199) [3745-66-99(A)(B)]			✓	
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of. (265.197) [3745-66-97)]	✓			

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]		✓		CURRENTLY, WASTE PILE CLOSURE IS BEING APPEALED THROUGH THE EBR, ENVIRONMENTAL BOARD OF REVIEW. NO LONGER IS COAL PILE BEING ACTIVELY USED FOR COAL TAR DECANTER STORAGE AND DISPOSAL.
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.		✓		
b) The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff.		✓		
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]			✓	
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]			✓	
b) The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction.			✓	

	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)]			✓	
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)]			✓	

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OHD 060409521

Facility: REPUBLIC STEEL MAH. VALLEY WARREN Address: 1040 PINE AVE City: WARREN

State: OHIO Zip Code: 44481 County: TRUMBULL Telephone: 216-841-8200

Facility Operator: REPUBLIC STEEL (THOMAS KACHUR) Title: MGR. ENV. CONTROL Telephone: 216-841-8200

Facility Owner: REPUBLIC STEEL CORPORATION Address: P.O. BOX 6778

City: CLEVELAND State: OHIO Zip Code: 44101 Telephone: 216-622-5000

Type of Ownership: X Private ____ Government State HWFAB No. 02-78-0184

Date of Inspection: 6/17/82 Time of Inspection: (Start) 9:04 (Finish) ____

Advance Notification? ____ No X Yes: ____

Weather Conditions: CLOUDY 70'S

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	TOM KACHUR	MGR. ENV. CONTROL	216-841-8200
2.	ED BROESTL	ENV. ENGINEER	216-622-5096
3.	JEFF SUDIMACK	ENV. ENGINEER	216-841-8201
4.			

EPA 9011

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	DAVID N. WERTZ	ENVIRONMENTAL SCIENTIST	216-425-9171
2.			
3.			
4.			

1. Type(s) of hazardous waste site activity: A. X Generation B. X Storage C. ____ Treatment D. X Transportation E. ____ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: K062, K087

b) Non-Listed Wastes: X D001 I ____ D002 C ____ D003 R ____ D000 T

D001 - Bag House Dust

3. Has this facility submitted a Part A Permit Application? X Yes ____ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

____ Yes, See Remark # ____ X No

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____ X No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Complete Part 3 (Transp.) _____ No see Comment #1

a) Applicable U.S. EPA I.D. Number _____

b) Ohio P.U.C.O. GR TRSF Number _____

7. A brief description of site activity:

Steel Plant including Coke Battery, blast furnace, and mills producing flat roll coils and sheets, galvanize and Tenne coated steel, and silicone grade steel.

REMARKS, PART 1. (GENERAL INFORMATION)

RCRA INTERIM STATUS INSPECTION FORM

PART 2. 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 Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	✓			
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?		✓		
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.		✓		
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 Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	✓			
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 Sections 262.20 and 3745-52-20.	✓			
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	✓			
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	✓			
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 Sections 262.40 and 3745-52-40.	✓			

	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 (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	✓			
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 Sections 262.32(b) and 3745-52-32-B.			✓	
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	✓			
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	✓			
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.	✓			
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.	✓			
8. 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 Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:			✓	
a) Containers: the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.			✓	

	Yes	No	N/A	Remark #
b) The date that accumulation began is clearly marked on each container.			✓	
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).			✓	
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.			✓	
e) Tanks: the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.			✓	
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).			✓	
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).			✓	
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).			✓	
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-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 (Sections 262.34 and 3745-52-34).	✓			JSA's
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	✓			JSA's

	Yes	No	N/A	Remark #
11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.	✓			

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 3. TRANSPORTER REQUIREMENTS

	Yes	No	N/A	Remark #
1. The transporter has not transported any hazardous wastes without having first received a U.S. EPA Identification Number and registering with the Public Utilities Commission of Ohio. (263.11 and 3745-53-11).	✓			#1
2. The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Sections 262 and 3745-52.			✓	
3. The transporter has signed the manifest as required by Section 263.20(b) and 3745-53-20-B and has carried the manifest with the waste shipment as required by 263.20(c) and 3745-53-20-C.			✓	
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20 (d) and 3745-53-20-D and has retained a signed copy (available for inspection) for at least 3 years (263.22(a) and 3745-53-22-A).			✓	
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21 and 3745-53-21).			✓	
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Sections 263.20(e)(f) and 3745-53-20-E-F.			✓	
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) and 3745-53-22-C).			✓	
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?			✓	
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30 (a) and 3745-53-30-A).			✓	

	Yes	No	N/A	Remark #
b) Were all of the notifications required by Sections 263.30(c)(d) and 3745-53-30-C-D made?			✓	
c) Was the discharge cleaned up as required by Sections 263.31 and 3745-53-31?			✓	
9. Does the transporter store hazardous wastes temporarily while they are in transit?			✓	
a) Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage. (263.12 and 3745-53-12)			✓	

NOTE: TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.

10. Does the transporter import hazardous waste into the United States?			✓	
11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?			✓	

NOTE: A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTIONS 263.10(c) AND 3745-53-10-C BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTIONS 262 AND 3745-52.

REMARKS, PART 3. TRANSPORTER REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention
D: Contingency and Emergency
E: Manifest/Records/Reporting
F: Ground Water Monitoring
G: Closure
H: Financial Requirements

Subpart B: General Facility Standards

	Yes	No	N/A	Remark #
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 Sections 265.13(a)(1) and 3745-55-13-A-2.	✓			
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 (Sections 265.13(b) and 3745-55-13-B).	✓			
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).				
a) 24 hour surveillance system.	✓			
b) Artificial or natural barrier completely surrounding the active portion of the facility.	✓			
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	✓			
d "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	✓			

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)	✓			
a) Inspect emergency equipment.	✓			
b) Inspect monitoring equipment.			✓	
c) Inspect security, alarm and communications devices.	✓			
d) Inspect process equipment (pipes, pumps, etc.).	✓			
e) Inspect containment structures (dikes, curbs, etc.).	✓			
f) Inspect facility for structural malfunctions (roof, floor, etc.).	✓			
g) Inspect hazardous waste handling/loading areas each day used.	✓			
h) Record of any malfunctions due to equipment or operator errors.	✓			
i) Record of any hazardous waste discharges.	✓			
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-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.	✓			#2
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	✓			#2
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).				

	Yes	No	N/A	Remark #
a) Protection from sources of ignition.	✓			
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) Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	✓			

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 and 3745-55-31).		✓		
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).				
a) Internal alarm system	✓			
b) Access to telephone, radio or other device for summoning emergency assistance.	✓			
c) Portable fire control equipment.	✓			
d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	✓			
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	✓			
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 (Sections 265.34 and 3745-55-34).	✓			

	Yes	No	N/A	Remark #
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 and 3745-55-35).			✓	
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) and 3745-55-37-A).	✓			#3
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) and 3745-55-37-B).			✓	

Subpart D: Contingency and Emergency

	Yes	No	N/A	Remark #
1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	✓			
a) Actions to be taken by personnel in the event of an emergency incident.	✓			
b) Arrangements or agreements with local or state emergency authorities.	✓			
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	✓			
d) A list of all emergency equipment including location, physical description and outline of capabilities.	✓			
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).			✓	#4
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. (Sections 265.53 and 3745-55-53).		✓		#5

	Yes	No	N/A	Remark #
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	✓			
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 (Sections 265.55 and 3745-55-55).	✓			
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 and 3745-55-56.			✓	Never had to implement the plan.

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 Sections 265.73 and 3745-55-73 which contains the following information:	✓			#6
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 (262.73(b)(1) and 3745-55-73-B-1).	✓			
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	✓			
c) The estimated (or actual) weight, volume or density of the waste material(s).	✓			
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).	✓			

	Yes	No	N/A	Remark #
e) The present physical location of each hazardous waste within the facility.	✓			
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) and 3745-55-73-B-2).			✓	
g) Records of any waste analyses and trial tests required to be performed.	✓			
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	✓			
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	✓			
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	✓			
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	✓			

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).			✓	

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

4. 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 (Sections 265.71 and 3745-55-71).			✓	

	Yes	No	N/A	Remark #
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).			✓	
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).			✓	
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.			✓	
6. 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 Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.			✓	

Subpart F: Groundwater Monitoring N/A

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	Yes	No	N/A	Remark #
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.				

	Yes	No	N/A	Remark #
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.				
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.				

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: (Sections 265.112 and 3745-56-03)	✓			No plans to Close at this Time
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	✓			
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	✓			
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	✓			
d) A description of steps taken to decontaminate facility equipment.	✓			
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.			✓	
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	✓			

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.			✓	
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.			✓	
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.			✓	
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).			✓	
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).			✓	

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.			✓	
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.			✓	
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.			✓	
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.			✓	

	Yes	No	N/A	Remark #
9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.			✓	

Subpart H: Financial Requirements

1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).	✓			

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265. 171, .172, .173 and 3745-56-51,-52-53).	✓			dumpster type containers.
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	✓			

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	Yes	No	N/A	Remark #
3. 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 Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).	✓			
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265. 177(a), (b) and 3745-56-57-A-B).			✓	

	Yes	No	N/A	Remark #
5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).	✓			

Subpart J: Storage in Tanks

	Yes	No	N/A	Remark #
1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a waste-feet cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	✓			
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	✓			
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).	✓			
4. Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).	✓			
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).			✓	
a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.			✓	
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.			✓	

	Yes	No	N/A	Remark #
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Sections 265.198(a) and 3745-56-78).	✓			
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.	✓			
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	✓			
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-B).			✓	
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79).	✓			
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77).	✓			

Subpart K: Surface Impoundments N/A

1. The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material (Sections 265.222 and 3745-57-03).				
2. Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water (265.22 and 3745-57-04).				

ISS INSPECTION COMMENTS
REPUBLIC STEEL - MAHONING VALLEY WARREN
JUNE 17, 1982

#1. The company has not transported hazardous wastes yet, and will register with PUCO prior to doing so.

#2. Job Safety Analysis Procedures (JSA's) are used for the Personnel Traning and records and appear to meet the intent of the regulations,

#3. The facility has it's own hospital and feels it can handle emergencies associated with the hazardous wastes. The company also has it's own fire brigades.

#4. The facilities are all outdoors and would not necessitate evacuation.

#5. The company feels the hazards involved with the materials (pickle liquor and decanter tank tar sludge) would not necessitate the involvement of the local fire departments.

#6. There is continous production and hauling of bag house dust and pickle liquor, which are mixed together and hauled daily. The manifest act as records.

RCRA Inspection Report

EPA Identification Number OHD 060409521

HWFAB Permit Number (if appropriate) 02-78-0184

Facility Name Republic Steel Mahoning Valley Warren

Location 1040 Pine Avenue 44481

Warren, Ohio

Person(s) Interviewed	Title	Telephone
Tom Kachur	MGR. ENV. CONTROL	216-841-8200
Ed Broestl	ENV. ENGINEER	216-622-5096
Jeff Sudimack	ENV. ENGINEER	216-841-8201

Inspector(s)	Agency/Title	Telephone
DAVID N. WERTZ	Ohio EPA Environmental Scientist	216-425-9171
	Ohio EPA	
	Ohio EPA	

Installation Activity

Mark One

- [ ] Generator only (G)
- [ ] Transporter only (T)
- [ ] TSDF only
- [ ] G-T
- [ ] G-TSDF
- [ ] T-TSDF
- [x] G-T-TSDF

If the site is a TSDF, check the boxes indicating which forms were used -

- [x] General Facility Standards, Preparedne and Prevention, Contingency and Emergency, Manifests/Records/Reporting
- [ ] Groundwater Monitoring
- [x] Closure and Post-Closure
- [ ] Financial Requirements
- [x] Containers S01
- [x] Tanks S02/T01
- [ ] Surface Impoundments S04/T02
- [ ] Incineration/Thermal Treatment T03
- [ ] Chemical/Physical/Biological T04

- [ ] Waste Piles S03
- [ ] Land Treatment D81
- [ ] Landfills D80

DEFICIENCY NOTIFICATION TABLE
ISS INSPECTION

FACILITY NO. - 81-HW-0184
OWNER - Republic Steel
FACILITY NAME - Mahoning Valley Warren
FACILITY LOCATION - 1040 Pine Ave, Warren, Ohio 44481
FACILITY CONTACT - Tom Kachur
ISS INSPECTION DATE - 7/29/81

PHONE NO. - (216)841-8200

Page	COLUMN I Item No.	COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer To ISS Remark	COLUMN VI OEPA Use
3	III A 1	3745-55-12(A)	265.12 (A)			
	2					
	B 1	3745-55-13	265.13	B	✓	
	2	3745-55-13	265.13			
	3	"	"			
	C 1	3745-55-14	265.14			
	2	"	"			
	3	"	"			
	4	"	"			
	D 1	3745-55-15	265.15			
	2	"	"			
	3	"	"			
4	4	"	"			
	5	"	"			
	6	"	"			
	7	"	"			
	8	"	"			
	E 1	3745-55-16	265.16			
	2	"	"			
	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	F 1	3745-55-17	265.17			
	2	"	"			
	3	"	"			
5	IV A 1	3745-55-31	265.31			
	B 1	3745-55-32	265.32			
	2	"	"			
	3	"	"			
	C 1	3745-55-33	265.33			
	2	"	"			
	D 1	3745-55-34	265.34			
6	E	3795-55-35	265.35			
	V A 1	3745-55-52	265.52			

Page	Item No.			OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
		A	2	3745-55-52	265.52			
			3	"	"			
			4	"	"			
			5	"	"		✓	
7		B	1	3745-55-53	265.53			
		C	1	3745-55-55	265.55			
			2	"	"			
			3	"	"			
		D	1	3745-55-56	265.56			
	VI	A	1	3745-55-71	265.71			
			2	"	"			
		B	1	3745-55-72	265.72			
8		C	1	3745-55-73	265.73			
			2b	"	"			
			c	"	"			
			d	"	"			
			e	"	"			
			f	"	"			
			g	"	"			
9	VII	A	1	3745-56-03	265.112			
			2	"	"			
			3	"	"			
			4	3745-56-32	265.142			
		B	1	3745-56-09	265.118			
	VIII	I	1	3745-56-51	265.171			
			2	3745-56-52	265.172			
			3	3745-56-53	265.173		✓	
			4	"	"			
			5	3745-56-54	265.174			
			6	3745-56-56	265.176			
10			7	3745-56-57	265.177			
			8	"	"			
		J	1	3745-56-72	265-192			
			2	"	"			
			3	"	"			
			4	3745-56-73	265-193			
			5	3745-56-74	265.194			
			6	3745-56-78	265.198			
			7	3745-56-79	265.199			
11			8	3745-56-78	265.198			
		K	1	3745-57-03	265.222			
			2	3745-57-04	265.223			
			3	3745-57-06	265.225			
			4	3745-57-07	265.226			
			5	"	"			
			6	3745-57-10	265.229			
			7	3745-57-11	265.230			

Page	Item No.			OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
12		L	1	3745-57-31	265.251			
			2	3745-57-32	265.252			
			3		265.258			
			4	3745-57-36	265.256			
			5	"	"			
			6	3745-57-37	265.257			
			7	3745-57-37	265.257			
13		M	1	3745-57-52	265.272			
			2	"	"			
			3	3745-57-53	265.273			
			4	3745-57-56	265.276			
			5	3745-57-58	265.278			
			6	3745-57-58	265.278			
			7	3745-57-59	265.279			
			8	3745-57-61	265.281			
			9	3745-57-62	265.282			
14	N	A	1	3745-57-72	265.302			
			2	"	"			
			3	"	"			
			4	"	"			
		B	1	3745-57-79	265.309			
			2	"	"			
		C	1	3745-56-03	265.112			
			2	"	"			
			3	"	"			
			4	3745-56-32	265.192			
		D	1	3745-57-82	265.312			
15				3745-55-17	265.17(b)			
		E	1	3745-57-83	265.313			
			2	3745-55-17	265.17(b)			
		F	1	3745-57-84	265.314			
			2	"	"			
			3	"	"			
			4	"	"			
		G	1	3745-57-85	265.315			
16		O&P						
	I	B	1	3745-58-33	265.373			
			2	"	"			
			3	"	"			
			4	"	"			
			5	"	"			
	II	A	1a	3745-58-35	265.375			
			b	"	"			
			c	"	"			
17								
			2a	3745-58-35	265.375			
			b	"	"			
		B	1	"	"			
			2	"	"			
			3	"	"			
			4	"	"			
			5	"	"			

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
	III A 1	3745-58-37	265.377			
	B 1	"	"			
	C 1	"	"			
	D 1	"	"			
	E 1	"	"			
	F 1	"	"			
	G 1	"	"			
18	IV A 1	3745-58-42	265.382			
	2	"	"			
	Q 1	3745-58-51	265.401			
	2	"	"			
19	3	3745-58-52	265.402			
	4	3745-58-53	265.403			
	5	3745-58-55	265-405			
	6	3745-58-56	265.406			
	IX I (A)	3745-52-40	262.40			
	(B) 1	3745-52-21	262.21			
	2	"	"			
20	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	7	"	"			
	8	50-42	122.6			
	(C)	3745-52-42	262.42			
	2. (A)	3745-52-30	262.30			
	(B)	3745-52-31	262.31			
	(C)	3745-52-33	262.33			
21	3 1	3745-52-34	262.34			
	2	"	"			
	3	3745-56-54	265.174			
	4a	3745-56-72	265.192			
	b	"	"			
	c	"	"			
	d	3745-56-74	265.184			
	e	3745-56-78	265.198			
	f	3745-56-79	265.199			
22	VI A	3745-52-40	262.40			
	B	3745-52-41	262.41			
	VII 1a	3745-52-50	262.50			
	b	"	"			
	c	"	"			
	2	"	"			
23	X I	3745-53-22	263.22			
	II A	3745-53-20	263.20			
	B	"	"			
	V A	3745-53-10	263.10			
	B	3745-53-10	"			

STATE IDENTIFICATION NUMBER
87-HW- 0154

EPA IDENTIFICATION NUMBER
OHD 060 409 521

TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A.- General Facility Standards

I. General Information:

(A) Facility Name: REPUBLIC STEEL MAHONING VALLEY WARREN

(B) Street: 1040 PINE AVE.

(C) City: WARREN (D) State: OH (E) Zip Code: 44481

(F) Phone: 216-841-8200 (G) County: TRUMBULL

(H) Operator: SAME

(I) Street:

(J) City: (K) State: (L) Zip Code

(M) Phone: (N) County:

(O) Owner: REPUBLIC STEEL CORP.

(P) Street: P.O. BOX 6778

(Q) City: CLEVELAND (R) State: OH (S) Zip Code: 44101

(T) Phone: 216-622-5000 (U) County: CUYAHOGA

(V) Date of Inspection: 7-29-81 (W) Time of Inspection (From) 9:00A (To) 11:30A

(X) Weather Conditions: 75°F LIGHT RAIN

(Y) Person(s) Interviewed	Title	Telephone
TOM KACHUR	MGR. ENV. CONTR.	216-841-9300
DAVE GUBANC	SOLID WASTE MGMT ENGR	216-622-891
DALE PAPANCIK	"	216-622-5916

(Z) Inspection Participants	Agency/Title	Telephone

(AA) Preparer Information

Name	Agency/Title	Telephone
WM SKOWRONSKI	DISTRICT ENGINEER	216-425-9171

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

___A. Storage and/or Treatment
1. Containers (I)
2. Tanks (J)
3. Surface Impoundments (K)
4. Waste Piles (L)

___B. Land Treatment (M)

___C. Landfills (N)

___D. Incineration and/or Thermal Treatment (O and P)

___E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sectio IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?		✓		N/A
2. Facility expansion?		✓		N/A
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓			SEE REMARK #1
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓			BUT PLAN DOES NOT CONTAIN ANALYSIS OF IRON B.I. THE ANALYSIS IS AVAILABLE AT FACILITY IN PURCHASER'S OFFICE. ∴ SATISFACTORY TO ME.
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	✓			ANALYSIS NOT NEEDED SINCE WASTES REMAIN CONSISTENT.
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	✓			
2. Artificial or natural barrier around facility?	✓			
3. Controlled entry?	✓			
4. Danger sign(s) at entrance?	✓			WARNING SIGN AT COAL TAR SLUDGE NOT NEEDED DUE TO NATURE OF MATERIAL.
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	✓			BUT HAVE NOT YET OCCURRED
2. Records of operator error?	✓			
3. Records of discharges?	✓			

*Not Inspected

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	✓			
5. Safety, emergency equipment?	✓			
6. Security devices?				N/A
7. Operating and structural devices?	✓			
8. Inspection log?	✓			

(E) Do personnel training records include: (Effective 5/19/81) COMPANY HAS HISTORICALLY EMPLOYED THEIR JOB SAFETY ANALYSIS PROGRAM.

	Yes	No	NI*	Remarks
1. Job titles?	✓			
2. Job descriptions?	✓			
3. Description of training?	✓			
4. Records of training?	✓			
5. Have facility personnel received required training by 5-19-81?	✓			
6. Do new personnel receive required training within six months?	✓			

(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?

	Yes	No	NI*	Remarks
1. Special handling?	✓			SEE REMARK #1
2. No smoking signs?				N/A
3. Separation and protection from ignition sources?				N/A

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

	Yes	No	NI*	Remarks
(A) Maintenance and Operation of Facility:				
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		✓		
(B) If required, does the facility have the following equipment:				
1. Internal communications or alarm systems?	✓			
2. Telephone or 2-way radios at the scene of operations?	✓			
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			

Indicate the volume of water and/or foam available for fire control:

_____

_____

(C) Testing and Maintenance of Emergency Equipment:				
1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			LIMITED NEED.
2. Is emergency equipment maintained in operable conditions?	✓			
(D) Has owner or operator provided immediate access to internal alarms? (if needed)	✓			

*Not Inspected

(E) Is there adequate ai. : space for unobstructed movement? ___ ___ ___ N/A

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

	Yes	No	NI*	Remarks
1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	✓			
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	✓			
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	✓			
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	✓			
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)				N/A DUE TO NATURE OF WASTES.

*Not Inspected

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?		✓		N/A
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	✓			
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?		✓		

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	✓			
2. Are records of past shipments retained for 3 years?	✓			
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	✓			

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?	✓			LOGS KEPT BY OPERATORS IN THEIR RESPECTIVE AREAS
2. Does the operating record contain the following information:				
**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?				N/A
c. The location and quantity of each hazardous waste within the facility?	✓			LOCATION - YES QUANTITY RECORDED AS HAULED AWAY.
***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)				N/A
e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	✓			
f. Reports detailing all incidents that required implementation of the Contingency Plan?	~~✓~~			N/A ~~N/A DO TO NATURE~~ ~~[illegible]~~ NONE OCCURRED
g. All closure and post closure costs as applicable? (Effective 5-19-81)	✓			

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	✓			
2. Has this plan been submitted to the Regional Administrator		✓		NOT REQ'D YET
3. Has closure begun?		✓		
4. Is closure estimate available by May 19, 1981?	✓			
Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)	N/A			

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

cility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are containers in good condition?	✓			
2. Are containers compatible with waste in them?	✓			
3. Are containers stored closed?		✓		COMPANY DOES NOT REQ NEEDED & COMPLIES WITH DOT - OK WITH ME
4. Are containers managed to prevent leaks?	✓			
5. Are containers inspected weekly for leaks and defects?	✓			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	✓			

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)				N/A
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				N/A

J
TANKS

Facility Name: _____ Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	✓			
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	✓			
3. Do continuous feed systems have a waste-feed cutoff?	✓			MANUAL
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?				N/A
5. Are required daily and weekly inspections done?	✓			
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	✓			
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)				N/A

*Not Inspected

	Yes	No	NI*	Remarks

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: 17000 Zinc Plating Sol gallons 94000 gal spent Hydrochloric Acid

Tank diameter: — feet

Distance of tank from property line SEVERAL HUNDRED feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?				
2. Do earthen dikes have protective covers?				
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?				
4. Is the freeboard level inspected at least daily?				
5. Are the dikes inspected weekly for evidence of leaks or deterioration?				
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)				

L

WASTE PILES

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	___	___	___	_____
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	___	___	___	_____
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	___	___	___	_____
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	___	___	___	_____
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	___	___	___	_____
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	___	___	___	_____
7. Are piles of incompatible waste protected by barriers or distance from other waste?	___	___	___	_____

*Not Inspected

M

LAND TREATMENT

Facility Name: _____ Date of Inspection: _____

1. Is treated hazardous waste capable of biological or chemical degradation? ___ ___ ___ _____

2. Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)? ___ ___ ___ _____

3. Is waste analyzed according to 265.273? ___ ___ ___ _____

4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276? ___ ___ ___ _____

5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? ___ ___ ___ _____

6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278? ___ ___ ___ _____

7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility? ___ ___ ___ _____

8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.) ___ ___ ___ _____

9. Are incompatible wastes land treated? (If yes, 265.17(b) applies) ___ ___ ___ _____

N
LANDFILLS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
(A) General Operating Requirements Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	___	___	___	_____
**2. Collection of run-off from active portions of the fill?	___	___	___	_____
**3. Is collected run off treated?	___	___	___	_____
4. Control of wind dispersal of hazardous waste?	___	___	___	_____
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	___	___	___	_____
2. The contents of each cell and the location of each hazardous waste type withing each cell?	___	___	___	_____
(C) Closure and Post-Closure				
1. Is the Closure Plan available for inspection by 5-19-81?	___	___	___	_____
2. Has this plan been submitted to the Regional Administrator?	___	___	___	_____
3. Has closure begun?	___	___	___	_____
4. Is closure cost estimate available by 5-19-81?	___	___	___	_____
(D) Special requirements for ignitable or reactive waste				
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?	___	___	___	_____

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply.	___	___	___	_____
Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells?	___	___	___	_____
If not, the provisions of 40 CFR 265.17(b) apply.	___	___	___	_____
Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	___	___	___	_____
2. Does the landfill have a chemically and physically resistant liner system?	___	___	___	_____
3. Does the landfill have a functional leachate collection system?	___	___	___	_____
4. Are free liquids stabilized prior to or immediately after placement in the landfill?	___	___	___	_____
Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	___	___	___	_____

Inspected

O and P
INCINERATION and THERMAL TREATMENT

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): _____

_____

B. Components and steady state condition:

**** Was this component at SS prior to adding waste?

	Component	Yes	No	NI*	Remarks
1.	_____	___	___	___	_____
2.	_____	___	___	___	_____
3.	_____	___	___	___	_____
4.	_____	___	___	___	_____
5.	_____	___	___	___	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

	Yes	No	NI*	Remarks
1. Required analyses; has an analysis been performed for the following?				
a. Heating value	___	___	___	_____
b. Halogen content	___	___	___	_____
c. Sulfur content	___	___	___	_____

*Not Inspected

KEY TO CODED ITEMS (COLUMN IV)

A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.

B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.

D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 12 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.

E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.

F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.

G. NFPA's code requires that the tanks be located 50 feet from the property line.

OhioEPA

Re: Application Number 81-HW-0184
Trumbull County

RECEIVED
SEP 14 1981
WASTE MANAGEMENT BRANCH
EPA, REGION V

September 10, 1981

Thomas Kachur
Manager Environmental Control
Republic Steel Mahoning Valley Warren
1040 Pine Avenue
Warren, Ohio 44481

Dear Mr. Kachur:

On July 29, 1981, William Skowronski of the Ohio Environmental Protection Agency conducted an inspection of your facility as part of the Hazardous Waste Facility permit review process. Your facility was represented by yourself.

A copy of the inspection form is enclosed for your information. No unresolved deficiencies were noted, however, there may be comments included in the inspection form which you should consider.

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

Paul Flanigan

Paul Flanigan, P.E.
Hazardous Waste Materials Management

PF/maf

cc: Kathleen Homer, U.S. EPA, Region V
William Skowronski, NEDO

CERTIFIED MAIL

	Yes	No	NI*	Remarks
2. Has documented or written data been substituted for analysis of either:				
a. Lead?	___	___	___	_____
b. Mercury?	___	___	___	_____

List other parameters for which the waste is tested to enable owner or operator to establis steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be testad.)

		Remarks
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____

III. Monitoring and Insbections

	Yes	No	NI*	Remarks
Are combustion/emission control instruments monitored at least every 15 minutes?	___	___	___	_____
Is steady state maintained or corrections attempted?	___	___	___	_____
Is stack plume observed at least hourly for normal color and opacity?	___	___	___	_____
Did any stack observations made by owner or operator show a plume different than normal?**	___	___	___	_____
If yes to D above, were corrections made to return emissions to normal appearance?**	___	___	___	_____
Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	_____
Are emergency shutdown controls and system alarms checked daily for proper operation?	___	___	___	_____

t Inspected
ecify in Remarks for what period of time this was checked.

IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned.)	___	___	___	_____
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	___	___	___	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: _____ SEE REMARK #1

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	✓	___	___	_____
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	___	___	___	N/A BATCH

*Not Inspected

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	✓			
4. Are inspection procedures followed according to 265.403?	✓			
5. Are the special requirements fulfilled for ignitable or reactive wastes?	✓			
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)		✓		

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

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

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	✓			
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	✓			
2. Name, mailing address, telephone number, and EPA ID Number of Generator	✓			

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	✓			
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	✓			
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
6. The total quantity of waste(s) and the type and number of containers loaded?	✓			
7. Required certification?	✓			
8. Required signatures?	✓			
(C) Does the owner or operator submit exception reports when needed?	✓			

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	✓			
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	✓			
(C) If required, are placards available to transporters of hazardous waste?		✓		TRANSPORTER REQ'D TO SUPPLY.

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	___	___	___	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	___	___	___	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	___	___	___	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	___	___	___	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	___	___	___	_____
c. Do continuous feed systems have a waste-feed cutoff?	___	___	___	_____
d. Are required daily and weekly inspections done?	___	___	___	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	___	___	___	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	___	___	___	_____

*Not Inspected

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	✓			
(B) Has the generator submitted Annual Reports and Exception Reports as required?	✓			

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

	Yes	No	NI*	Remarks
Has the installation imported or exported Hazardous Waste?	✓			

(If answered Yes, complete the following as applicable.)

	Yes	No	NI*	Remarks
1. Exporting Hazardous waste, has a generator:				WASTE ACID TO TORONTO
a. Notified the Administrator in writing?	✓			
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	✓			
c. Met the Manifest requirements?	✓			
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?				N/A

*Not Inspected

X

TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	___	___	___	_____

II. INTERNATIOINAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?	___	___	___	_____
B. Are signed completed manifest(s) on file?	___	___	___	_____

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?	___	___	___	_____
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	___	___	___	_____

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

1. D002 - SHOULD BE REMOVED FROM APPLICATION SINCE DELISTED AND NOT EP TOXIC.

K062 - SPENT PICKLE LIQUOR

K087 - COAL TAR SLUDGE

D001 - GALVANIZE BAG HOUSE DUST WAS APPLIED FOR AS IGNITABLE IN DRY FORM BUT I THINK REACTIVE APPLIES SINCE MATERIAL GIVES OFF HEAT SLOWLY WHEN MOISTURE MAKES CONTACT. THIS MATERIAL IS NOW MIXED ~~WITH~~ IN SPENT PICKLE LIQUOR SUMPS DAILY TO AVOID HEAT BUILD UP.

As per phone conversation with Dale Papajcik Solid Waste Management Engineer with Republic Steel, the company wishes to leave D002 in permit application at this point.

JF 9-10-81