This is one file folder of multiple folders for this site.

Approximate date range:

1981 – 2000

CEI-AVON LAKE
OHD 046 629 648
LORAIN COUNTY

FILE #1

HW

OhioEPA

MEMORANDUM

To: CEI-AVON LAKE

From: P.S. (Reviewer); Ohio EPA Legal Office.

Date: 10/8/15

These files were reviewed to determine whether records contained herein are confidential or otherwise exempt from the disclosure obligations of Ohio Revised Code section 149.43.

X **Public records**

No records were removed based on this review.

___ **Not public**

Records were removed or redacted for the reasons given below:

___ **Attorney- Client Privilege**, State ex rel. Leslie v. Ohio Hous. Fin. Agency, 105 Ohio St.3d 261, 265 (2005).

___ **Attorney Work Product**, Squire, Sanders & Dempsey, L.L.P. v. Givaudan Flavors Corp., 127 Ohio St.3d 161 (2010).

___ **Confidential Law Enforcement Investigatory Records**, ORC 149.43(A)(1)(h).

___ **Social Security Numbers**, State ex rel. Office of Montgomery County Pub. Defender v. Siroki, 108 Ohio St.3d 207 (2006).

___ **Release Prohibited by Law**, (i.e. trade secret), ORC 149.43(A)(1)(v).

___ **Other Specified Reason**: _____

___ **All files are confidential**

Should you have any questions regarding this issue, please contact Ohio EPA's Legal Office.

(This memorandum is to remain visibly attached to this file.)

50 West Town Street • Suite 700 • P.O. Box 1049 • Columbus, OH 43216-1049
www.epa.ohio.gov • (614) 644-3020 • (614) 644-3184 (fax)

OhioEPA
State of Ohio Environmental Protection Agency

STREET ADDRESS:
Lazarus Government Center
122 S. Front Street
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

File

May 1, 2000

under
CEI CO Avon Lake Plant

Ms. Lisa Cole
Thelen, Reid and Priest LLP
P.O. Box 87
Pittsburgh, Pennsylvania 15219

Dear Ms. Cole:

REGARDING EPA ID NO.: OHD 046 629 648

LOCATION OF INSTALLATION: (Orion Power Midwest, L.P. - Avon Lake Power Plant)
33570 Lake Road
Avon Lake, Ohio 44012

In response to your request to update hazardous waste notification data, the following information has been updated:

Name Change - *From: Orion Power MidWest, LLC*
To: Orion Power Midwest, L.P.

Ownership Change - Orion Power Midwest, L.P.

If you have any questions, you can contact Josh Ellis at (614) 644-2922; fax: (614) 728-1245; and e-mail: jellis@epa.state.oh.us

Sincerely yours,

Josh Ellis
Data Management Section
Division of Hazardous Waste Management

Bob Taft, Governor
Maureen O'Connor, Lieutenant Governor
Christopher Jones, Director

Printed on Recycled Paper

file

Ohio EPA

Re: CEI - Ashtabula "C"
Ashtabula "A & B"
Avon Lake
Lakeshore
Eastlake

Mr. David W. Whitehead
Cleveland Electric Illuminating Company
P.O. Box 5000
Cleveland, Ohio 44101

September 27, 1982

Dear Mr. Whitehead:

This office is in receipt of your September 24, 1982, letter requesting a thirty day extension of the time allotted for response to the CEI inspection reports. We have no problem with allowing the additional time.

We look forward to receiving the responses no later than October 29, 1982.

Thank you for the communication.

Yours truly,

Christine Mikoy Frazier
Environmental Scientist
Division of Hazardous Materials Management

CMF:km

cc: Doug Rider, CEI
Carlton Rush, CEI

Re: DHMM
C.E.I. - Avon Lake
Permit No. 02-47-0269

Mr. Roberts
C.E.I. - Avon Lake
33570 Lake Road
Avon Lake, Ohio 44012

August 26, 1982

Dear Mr. Roberts:

Thank you for the courtesy extended during my August 6, 1982, inspection of the C.E.I. - Avon Lake Plant. You, Mr. Hahn, and Mr. Rider represented C.E.I. during the inspection. This letter is intended to summarize the inspection.

The C.E.I. - Avon Lake permit presently allows you to treat corrosive (D001) wastes. You explained that the wastes are hazardous only due to corrosiveness and the neutralization takes place in a tank. This operation appears to constitute "elementary neutralization" and, as such, is presently not required to be permitted. You were advised to modify your Part A application and send a copy of the modification to the Ohio EPA, Northeast District Office; the Hazardous Waste Facility Approval Board; and U.S. EPA, Region V. The modification should be accompanied by a letter explaining the change.

During our meeting, you explained that some spent solvents are generated at the plant which are not currently being handled as hazardous wastes. As per my August 11, 1982, phone conversation with Doug Rider, the solvents may be Stoddard solvent and 1,1,1 trichloroethane. Please provide documentation as to the chemical composition and nature of the spent solvents. Also indicate the quantity of spent solvents generated over the past year on a monthly basis.

Regarding any emissions from the "treatment" operation, please describe the anticipated products of combustion of the spent boiler cleaning solution. In addition, please indicate which compounds are expected to pass through the air pollution control equipment and be emitted from the stack.

We also discussed the ash generated from the treatment of the spent cleaning solution. This ash is not currently being handled as a hazardous waste as 40 CFR 261.3 (c) and OAC 3745-51-03 (C) requires. In order to continue handling the "treatment" ash as non-hazardous, the EP Toxicity determination will have to be made as per 40 CFR 261.3 (d) and OAC 3745-51-03 (D).

Enclosed with this letter is a copy of the inspection report pertaining to the Avon Lake facility. The following problems were noted during the inspection:

(1) Contingency Plan had not been sent to local authorities as per OAC 3745-54-53 (B) and 40 CFR 265.53 (b);

(2) Contingency Plan did not include a complete listing of any safety and emergency equipment (location and description) which may be used in the case of an accident involving hazardous waste as per OAC 3745-54-52 (E) and 40 CFR 265.52 (e);

(3) Auxiliary equipment such as pumps and piping was not addressed in the Closure Plan as required by OAC 3745-56-03 or 40 CFR 265.112;

(4) Inspections of the waste storage tank were not documented as per OAC 3745-54-15 (D) and 40 CFR 265.15 (d); and

(5) Safety and emergency equipment maintenance was not addressed in the Inspection Schedule as required by OAC 3745-54-15 (B)(1) and 40 CFR 265.15 (b)(1).

Please provide the ash and solvent information as soon as possible. The above listed problems should be corrected within thirty (30) days of receipt of this letter. Please notify the Agency in writing when compliance is achieved. Copies of the revised plans should be submitted to verify compliance.

A copy of this report is being forwarded to Ms. Kathy Homer, U.S. EPA, Region V, at 230 S. Dearborn Street, Chicago, Illinois 60604. Please call me at (216) 425-9171 or Ms. Homer at (312) 886-7435 if you have any questions.

Yours truly,

Christine M. Frazier
Environmental Scientist
Division of Hazardous Materials Management

CMF:cll

Enclosure

cc: Ms. Paula Cotter, Div. of Hazardous Materials Management, Central Office
Ms. Kathy Homer, U.S. EPA, Region V

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OHD046629648

Facility: CEI - AVON LAKE PLANT Address: 33570 LAKE RD. City: AVON LAKE

State: OHIO Zip Code: 44012 County: LORAIN Telephone: (216) 622-9800

CONTACT: MR. HAHN

Facility Operator: CEI CO Title: ENVIRONMENTALIST Telephone: (216) 622-9800

Facility Owner: SAME Address:

City: State: Zip Code: Telephone:

Type of Ownership: X OTHER Private Government State HWFAB No. 02-47-0269

Date of Inspection: 8/6/82 Time of Inspection: (Start) 9:15 (Finish) 11:30

Advance Notification? ___ No X Yes:

Weather Conditions: SUNNY, 85°F

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	MR. HAHN	ENVIRONMENTALIST	(216) 622-9800
2.	MR RIDER	ENVIRONMENTAL ENGINEER	(216) 622-9800
3.			
4.			

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	CHRIS FRAZIER	ENVIRONMENTAL SCIENTIST II	(216) 425-9171
2.			
3.			
4.			

1. Type(s) of hazardous waste site activity: A. X Generation B. ____ Storage C. X Treatment
   D. ____ Transportation E. ____ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

   a) Listed Wastes: _____

   b) Non-Listed Wastes: ____ I (D001) ____ C (D002) ____ R (D003) ____ T (D000)

   D007, D008

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

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.) X No

a) Applicable U.S. EPA I.D. Number _____

b) Ohio P.U.C.O. GR TRSF Number _____

7. A brief description of site activity:

REMARKS, PART 1. (GENERAL INFORMATION)

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.				#1
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)?		X		
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.	X			
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by 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.			X	NO MANIFESTS HAVE BEEN GENERATED
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.			X	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.			X	
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.			X	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.			X	

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).			X	
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.			X	
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.			X	
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.	X			
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.	X			
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.			X	
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.			X	

	Yes	No	N/A	Remark #
b) The date that accumulation began is clearly marked on each container.			X	
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).			X	
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.			X	
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.	X			
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).			X	COVERED
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).				#2
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).				#2
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).	X			
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).	X			

	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.	X			RENTED TANKS ARE RINSED

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

Subpart C: Preparedness and Prevention

1.	Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).		X		
2.	If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	X			
	a) Internal alarm system	X			
	b) Access to telephone, radio or other device for summoning emergency assistance.	X			
	c) Portable fire control equipment.	X			
	d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	X			
3.	All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	X			
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).	X			

	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).	X			PUMPS ABSORBANT
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).	X			
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).			X	

Subpart D: Contingency and Emergency

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:	X			
a) Actions to be taken by personnel in the event of an emergency incident.	X			
b) Arrangements or agreements with local or state emergency authorities.	X			
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	X			
d) A list of all emergency equipment including location, physical description and outline of capabilities.		X		LISTING INCOMPLETE
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).		X		COMPANY FEELS THAT EVACUATION PLAN IS UNNECESSARY
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).		X		NOT YET SENT TO LOCAL AUTHORITIES

	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).	X			
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	X			
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.			X	

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.	X			SPENT BOILER CLEANING WASTE
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).	X			
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).	X			
a) 24-hour surveillance system.	X			
b) Artificial or natural barrier completely surrounding the active portion of the facility.	X			
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).	X			
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).	X			

	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: (Section 265.15 and 3745-55-15)				INCOMPLETE WITH REGARD TO SECURITY AND EMERGENCY EQUIPMENT.
a) Inspect emergency equipment.		X		#3
b) Inspect monitoring equipment.	X			
c) Inspect security, alarm and communication devices.		X		#3
d) Inspect process equipment (pipes, pumps, etc.).	X			
e) Inspect containment structures (dikes, curbs, etc.).	X			
f) Inspect facility for structural malfunctions (roof, floor, etc.).			X	
g) Inspect hazardous waste handling/loading areas each day used.	X			
h) Record of any malfunctions due to equipment or operator errors.	X			
i) Record of any hazardous waste discharges.	X			
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.	X			
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.	X			
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).				

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
a) Protection from sources of ignition.	___	___	X	___
b) Physical separation of incompatible waste materials.	___	___	X	___
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	___	___	X	___
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	___	___	X	___

	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.				

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:	X			
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).	X			
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	X			
c) The estimated (or actual) weight, volume or density of the waste material(s).	X			
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	X			REQUESTED THAT BOILER WHICH IS TREATING THE WASTE BE IDENTIFIED.

	Yes	No	N/A	Remark#
e) The present physical location of each hazardous waste within the facility.	X			
f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b) (2) and 3745-55-73-B-2).			X	
g) Records of any waste analyses and trial tests required to be performed.	X			MAINTAINED AT CLEVELAND LAB
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	X			
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.	X			
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.	X			
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.	X			

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).			X	

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).			X	

	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).	___	___	X	___
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).	___	___	X	___
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.	___	___	X	___
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.	___	___	X	___

Subpart F: Groundwater Monitoring

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.	___	___	X	___

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)	X			
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	X			
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.	X			
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	X			
d) A description of steps taken to decontaminate facility equipment.				#4
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.			X	
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.			X	

	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.	___	___	X	___
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.	___	___	X	___
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	___	___	X	___
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).	___	___	X	___
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).	___	___	X	___

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.	___	___	X	___
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	___	___	X	___
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	___	___	X	___
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.	___	___	X	___

	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.			X	

Subpart H: Financial Requirements

	Yes	No	N/A	Remark #
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).	X			

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

Subpart J: Storage in Tanks

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.	X			
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).	X			BOTH COVERED AND UNCOVERED TANKS USED.
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).				#2
4.	Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).				#2
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).			X	
	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.			X	
	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.			X	

	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).	—	—	X	—
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.	—	—	X	—
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	—	—	X	—
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).	—	—	X	—
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).	—	—	X	—
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).	X	—	—	RENTED TANKS ARE RINSED

Subparts O and P: Incineration and Thermal Treatment

1. Determination of Steady State

   a) Type of unit (i.e., type of incinerator or thermal treatment): COAL BOILER

   b) Components and steady state condition:

NOTE: INDICATE WHETHER OR NOT THIS COMPONENT WAS AT STEADY STATE PRIOR TO ADDING WASTE.

	Component	Yes	No	N/A	Remark #
1.	AIR FLOW	X			
2.	TEMPERATURE	X			
3.	COAL FEED*	X			
4.					

2. Waste Analysis

NOTE: THE FOLLOWING ARE MINIMUM REQUIREMENTS, FOR WASTES NOT PREVIOUSLY BURNED/TREATED:

	Yes	No	N/A	Remark #
a) Required analyses; has an analysis been performed for the heating value?	___	___	X	___
b) Halogen content?	___	___	X	___
c) Sulfur content?	___	___	X	___
d) Has documented or written data been substituted for analysis of either:				
1. Lead?	X	___	___	DATA PROVIDED BUT NOT REQUIRED BY REGULATION
2. Mercury?	X	___	___	↓

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

	Remark #
1. _____	___
2. _____	___
3. _____	___
4. _____	___
5. _____	___
6. _____	___
7. _____	___

3. Monitoring and Inspections

	Yes	No	N/A	Remark #
a) Are combustion/emission control instruments monitored at least every 15 minutes?	X			
b) Is steady state maintained or corrections attempted?	X			
c) Is tack plume observed at least hourly for normal color and opacity?	X			
d) Did any stack observations made by owner or operator show a plume different than normal?		X		
e) If yes to "d" above, were corrections made to return emissions to normal appearance?			X	

NOTE: SPECIFY IN REMARKS FOR WHAT PERIOD OF TIME THIS WAS CHECKED.

f) Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	X			
g) Are emergency shutdown controls and system alarms checked daily for proper operation?	X			

4. Open Burning

NOTE: ONLY COMPLETE THIS PART IF THE FACILITY OPEN BURNS HAZARDOUS WASTE.

a) Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned.)			X	
b) 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)			X	

COMMENTS

#1 - Spent boiler cleaning solution has been routinely tested, but the ash generated specifically from the "treatment" operation has not been analyzed. The ash is not being handled as a hazardous waste.

#2 - Inspections are performed but not documented.

#3 - Safety and emergency equipment not addressed in Inspection Schedule.

#4 - Closure Plan should also address auxiliary equipment such as pumps and piping.

hazardous • waste • facility • approval • board

James A. Rhodes, Governor
Wayne S. Nichols, Chairman

hwfab
P.O. Box 1049
361 E. Broad St.
Columbus, Ohio 43216
(614) 462-6981

Re: Permit No. 02-47-0269

Cleveland Electric Illuminating
Avon Lake Plant
33570 Lake Road
Avon Lake, Ohio 44012

Attn: William C. Roberts

DEC 17 1981

Dear Permittee:

Transmitted herewith is a certified copy of your Hazardous Waste Facility Installation and Operation Permit (Permit) as such permit was entered into the Journal of the Board. The permit consists of the following:

1) The standardized permit form (Findings and Conclusions and Issuance).

2) Terms and Conditions as approved by the Board (Special Terms and Conditions applicable to all permittees and Special Terms and Conditions for specific facilities).

3) Portions of the approved Part A permit application indicating the approved hazardous waste processes and design capacities and those hazardous wastes, identified by U.S. EPA Hazardous Waste Number, to be managed at the facility.

Processes, design capacities, and/or specific hazardous wastes which are stricken through or crossed out on the Part A permit application are not included in the approved permit. Unless otherwise notified by certified mail and afforded the opportunity for an adjudication hearing before the Board, all such deletions have occurred with the authorization of the applicant or his representative.

You are encouraged to carefully read the permit in its entirety. Any questions or comments concerning its content should be addressed to:

Ms. Peggy J. Vince
Executive Director
Hazardous Waste Facility Approval Board
P.O. Box 1049
361 East Broad Street
Columbus, OH 43216
Ph: (614)462-6981

HAZARADOUS WASTE FACILITY
APPROVAL BOARD
DEC 17 1981
ENTERED BOARD'S JOURNAL

EPA 9003

YOU ARE HEREBY ADVISED THAT: All appeals of these matters are to the Court of Appeals of Franklin County, 369 South High St., Columbus, Ohio 43215, Attn: Deputy Clerk, and shall be pursuant to the provisions of Section 3734.05(C)(7) of the Revised Code.

Sincerely,

Peggy J. Vince

Peggy J. Vince
Executive Director

PJV/ss

Enclosure

HAZARADOUS WASTE FACILITY
APPROVAL BOARD
DEC 17 1981
ENTERED BOARD'S JOURNAL

STATE OF OHIO

HAZARDOUS WASTE FACILITY APPROVAL BOARD

In the Matter of:	
Cleveland Electric Illuminating Avon Lake Plant 33570 Lake Road Avon Lake, Ohio 44012	
	Permit No. 02-47-0269
Applicant/Permittee	
The operator of the below-referenced hazardous waste facility	
Cleveland Electric Illuminating Avon Lake Plant 33570 Lake Road Avon Lake, Ohio 44012	
Facility	

HAZARADOUS WASTE FACILITY APPROVAL BOARD
DEC 17 1981
ENTERED BOARD'S JOURNAL

Pursuant to Section 3734.05(D) of the Revised Code, The Hazardous Waste Facility Approval Board (Board) makes the following Findings and Conclusions and issues a Hazardous Waste Facility Installation and Operation Permit (Permit)

FINDINGS AND CONCLUSIONS

1. The Applicant has submitted to the Board a completed permit application, stating the facility was in operation immediately prior to October 9, 1980, and has paid the required permit fee.

2. The Ohio Environmental Protection Agency (Agency) and/or the United States Environmental Protection Agency has inspected the facility and has prepared an Interim Status Standards Survey (survey).

3. All public comments timely received have been reviewed, evaluated and considered by the Board and the Agency for their relevancy and materiality.

4. The Agency has reviewed and considered the information on the permit application, the results of the survey, the public comments, and other pertinent material and has concluded that the facility was in substantial compliance, as determined by the Director of Environmental Protection, with applicable statutes and rules in effect immediately prior to October 9, 1980.

5. The Agency has informed the Applicant of the requirements of applicable hazardous waste rules of which it was not in compliance.

6. The Agency has recommended to the Board that a permit be issued to the facility.

7. Review and consideration of the information on the permit application, the results of the survey, the public comments, recommendations and comments by the Agency, and other pertinent material regarding the Applicant and the facility is sufficient to determine whether the facility meets the requirements for permit issuance set forth in Section 3734.05(D) of the Revised Code.

8. The staff of the Board has reviewed and considered the information on the permit application, the results of the survey, the public comments, the recommendation and comments by the Agency, and other pertinent material regarding the Applicant and the facility and has recommended to the Board that a permit be issued.

9. Pursuant to Resolution No. 186-81, passed September 15, 1981, the Board found that the facility:

   a. Was in operation immediately prior to October 9, 1980,

   b. Was in substantial compliance, as determined by the Director of Environmental Protection, with applicable statutes and rules in effect immediately prior to October 9, 1980,

   c. Submitted a completed permit application, and

   d. Has demonstrated to the Board that its operation after October 9, 1980 will comply with applicable performance standards adopted by the Director of Environmental Protection pursuant to division (D) of Section 3734.12 of the Revised Code.

10. Pursuant to such Resolution, the Board resolved and approved that a permit be issued with such standard terms and conditions set forth in the document entitled "Terms and Conditions" attached to the Resolution and such special terms and conditions as were approved by the Board.

11. The terms and conditions referenced in Finding Number 10 above, are attached hereto and incorporated herein.

12. Resolution No. 21-81, passed on August 26, 1981 and entered into the Journal of the Board on September 1, 1981, authorizes the Coordinator of the Board to:

HAZARADOUS WASTE FACILITY
APPROVAL BOARD
DEC 17 1981
ENTERED BOARD'S JOURNAL

a. Authorize the staff of the Board to issue to the facilities the Hazardous Waste Facility Installation and Operation Permits approved for issuance by resolution of the Board, and

b. Have signing authority indicating that such action has been approved by the Board.

NOW THEREFORE, A HAZARDOUS WASTE FACILITY INSTALLATION AND OPERATION PERMIT IS ISSUED TO THE Applicant for the facility, subject to the Terms and Conditions attached hereto and incorporated herein.

FOR THE BOARD, BY
ORDER OF THE BOARD

Peggy J. Vince Dec. 10, 1981

Entered into the Journal of the Board on Dec. 17, 1981 by

Madeline Lamson/sec.

HAZARDOUS WASTE FACILITY
APPROVAL BOARD
DEC 17 1981
ENTERED BOARD'S JOURNAL

Please print or type in the unshaded areas only (fill—in areas are spaced for elite type, i.e., 12 characters/inch). 81-HW-0269

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER: F O H D 0 4 6 6 2 9 6 4 8 1

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all Items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

AUG 4 PM 10

PLEASE PLACE LABEL IN THIS SPACE

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold—faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X		
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)	X		
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: AVON LAKE PLANT

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 ROBERTS, WILLIAM C	216 622 9800 EXT. 87-22

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 33570 LAKE ROAD

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 AVON LAKE	OH	44012

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 33570 LAKE ROAD

B. COUNTY NAME

LORAIN

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE
6 AVON LAKE	OH	44012	

HAZARDOUS WASTE FACILITY APPROVAL BOARD

DEC 17 1981

ENTERED TODAY'S JOURNAL

CONTINUED FROM THE FRONT

VII. SIC CODES *(4-digit, in order of priority)*

A. FIRST	B. SECOND
4911 (Generation, transmission and distribution of electric energy for sale	(specify)

C. THIRD	D. FOURTH
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME

CLEVELAND ELECTRIC ILLUMINATING COMPANY

B. Is the name listed in Item VIII-A also the owner? ☐ YES ☒ NO

C. STATUS OF OPERATOR *(Enter the appropriate letter into the answer box; if "Other", specify.)*

F = FEDERAL; S = STATE; P = PRIVATE; M = PUBLIC *(other than federal or state)*; O = OTHER *(specify)*

O (specify) Public Utility

D. PHONE *(area code & no.)*

A 216 622 9800

E. STREET OR P.O. BOX

P. O. BOX 5000

F. CITY OR TOWN

B CLEVELAND

G. STATE: OH

H. ZIP CODE: 44101

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES *(Discharges to Surface Water)*	D. PSD *(Air Emissions from Proposed Sources)*
9 N	9 P
B. UIC *(Underground Injection of Fluids)*	**E. OTHER** *(specify)*
9 U	9 (specify) Gas Turbine
C. RCRA *(Hazardous Wastes)*	**E. OTHER** *(specify)*
9 R	9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS *(provide a brief description)*

Generation, Transmission and Distribution of Electric Energy for Sale.

HAZARADOUS WASTE FACILITY
APPROVAL BOARD
DEC 17 1981
ENTERED BOARD'S JOURNAL

XIII. CERTIFICATION *(see instructions)*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE *(type or print)*	B. SIGNATURE	C. DATE SIGNED
John W. Fenker, Vice President	John W. Fenker	11·17·80

COMMENTS FOR OFFICIAL USE ONLY

C

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

ENVIRONMENTAL PROTECTION AGENCY

I. EPA I.D. NUMBER

1	2	3	4	5	6	7	8	9	10	11	12
F	O	E	D	0	4	6	2	9	6	4	8

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

☐ 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8	2 6	0 7	0 7

☐ 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	
HECTARE-METER	
ACRES	
HECTARES	

EXAMPLES FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G	
X-2	T 0 3	20	E	
1	S 0 1	1,700,000	U	
2	S 0 2	95,000	U	
3	T 0 4	129,600	U	
4				

C DUP TAL 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
5		HAZARADOUS WASTE FACI... APPROVAL BOARD		
6		DEC 17 1981 ENTERED BOARD'S JOURNAL		
7				
8		TAL 9-3-81		
9				
10				

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

Periodically, boiler tubes are chemically cleaned to remove scale deposits. This process may generate up 274,000 gallons of liquid waste including the rinse. This waste is evaporated in the combustion chamber of the boiler. All requirements of part 265 subpart P are observed.

HAZARADOUS WASTE FACILITY APPROVAL BOARD
DEC 17 1981
ENTERED BOARD'S JOURNAL

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous wastes: For each listed hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 25 wastes to list.

Form Approved OMB No. 158-S20004

EPA I.D. NUMBER (enter from page 1): W C H D 0 4 6 6 2 0 6 4 8

FOR OFFICIAL USE ONLY: W DUP 12 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	D002	2370 Tons/Yr.	T	T01 T02 T04	TAL
2	D007	1137 Tons/Yr.	T	T04	
3	D008				Included with above
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

HAZARADOUS WASTE FACILITY APPROVAL BOARD
DEC 17 1981
ENTERED BOARD'S JOURNAL

EPA Form 3510-3 (6-80)

CONTINUE ON RE

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

IV. DESCRIPTION OF HAZARDOUS WAST (continued)

E. USE THIS SPACE TO LIST ADDITIONA ROCESS CODES FROM ITEM D(1) ON P 3.

'81 APR 14 PM 2 59

LEGAL [illegible] SECTION

HAZARDOUS WASTE FACILITY APPROVAL BOARD

DEC 17 1981

ENTERED BOARD'S JOURNAL

EPA I.D. NO. (enter from page 1)

F | O | H | D | 0 | 4 | 6 | 6 | 2 | 9 | 6 | 4 | 8 | T/N C | 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
41 30 01 6	082 03 01 3

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

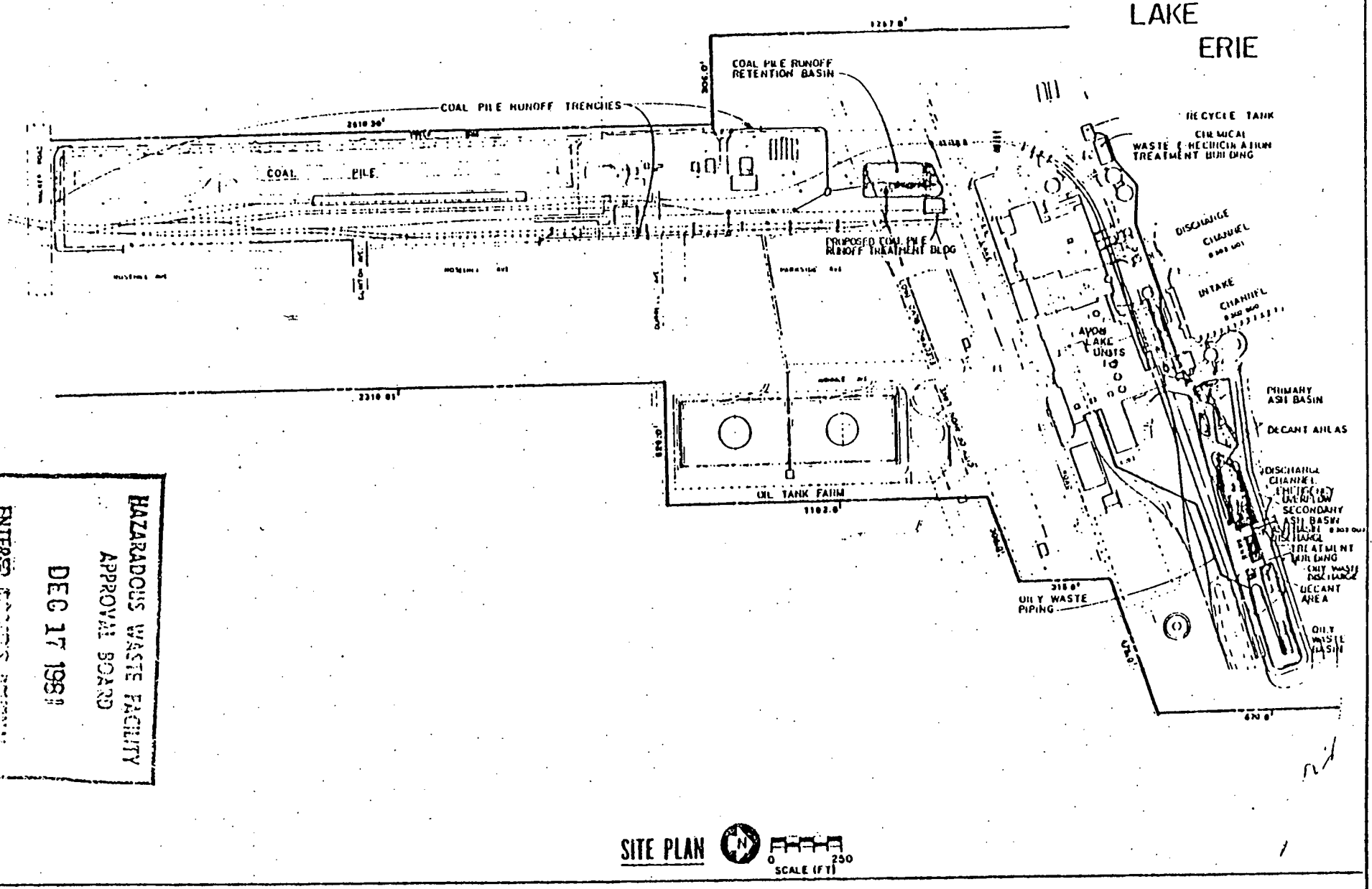
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
John W. Fenker, Vice Pres.	John W. Fenker	11.17.80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED



SITE PLAN N 0 250 SCALE (FT)

HAZARDOUS WASTE FACILITY
APPROVAL BOARD
DEC 17 1981
ENTERED

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

AVON LAKE PLANT

OH-HW-0269

TERMS AND CONDITIONS (General)

1. Only those hazardous wastes as identified by the U.S. EPA Hazardous Waste Number(s) set forth in the approved permit application, attached hereto, may be managed at the facility and only pursuant to the specified processes and design capacities indicated and set forth in the approved permit application.

2. The Permittee and the facility shall comply with all applicable performance standards adopted by the Director of Environmental Protection pursuant to Division (D) of Section 3734.12 of the Revised Code.

3. The Permittee and the facility shall comply with all applicable requirements of Chapter 3734 of the Revised Code, the Ohio Hazardous Waste Rules, and the federal statutes and regulations concerning hazardous waste.

4. This permit shall expire three years after its date of issuance. The date of issuance is the date the resolution to issue the permit was passed by the Board.

5. This permit, in accordance with the procedures of the Board, may be modified, revoked, or alternatively revoked and reissued, to comply with applicable provisions of Chapter 3734 of the Revised Code or the Ohio Hazardous Waste Rules.

6. The annual permit fee, payable to the Treasurer of State, shall be submitted to and received by the Board on or before the anniversaries of the date of issuance, during the term of the permit.

7. Unless otherwise specifically provided, all studies, reports, data, plans and other information required to be submitted by this permit shall be transmitted to:

Hazardous Waste Facility Approval Board
P.O. Box 1049
361 East Broad Street
Columbus, Ohio 43216

The permit number shall be indicated on the transmittal letter.

TERMS AND CONDITIONS (Special)

NOT APPLICABLE

HAZARADOUS WASTE FACILITY APPROVAL BOARD

DEC 17 1981

ENTERED BOARD'S JOURNAL

(fill—in areas are spaced for elite type, i.e., 12 characters/inch). 01 11 80 01 Form Approved OMB No. 158-R0175

FORM 1 GENERAL — EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

0	1	F	O	H	D	0	4	6	6	2	9	6	4	D
1	2												13	14 15

NEDO

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold—faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
	16	17	18		19	20	21
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
	22	23	24		25	26	27
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
	28	29	30		31	32	33
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
	34	35	36		37	38	39
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)	X			J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
	40	41	42		43	44	45

III. NAME OF FACILITY

1 SKIP: AVON LAKE PLANT

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 ROBERTS, WILLIAM C.	216 622 9800 EXT. 87*226

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 33570 LAKE ROAD

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 AVON LAKE	OH	44012

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 33570 LAKE ROAD

B. COUNTY NAME

LORAIN

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6 AVON LAKE	OH	44012	

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
4911 (Generation, transmission and distribution of electric energy for sale	(specify)

C. THIRD	D. FOURTH
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: CLEVELAND ELECTRIC ILLUMINATING COMPANY

B. Is the name listed in Item VIII-A also the owner? ☐ YES ☒ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL, S = STATE, P = PRIVATE, M = PUBLIC (other than federal or state), O = OTHER (specify)
O (specify) Public Utility

D. PHONE (area code & no.): A 216 622 9800

E. STREET OR P.O. BOX: P.O. BOX 5000

F. CITY OR TOWN: CLEVELAND

G. STATE: OH

H. ZIP CODE: 44101

IX. INDIAN LAND
Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
9 N	9 P
B. UIC (Underground Injection of Fluids)	E. OTHER (specify)
9 U	9 (specify) Gas Turbine
C. RCRA (Hazardous Wastes)	E. OTHER (specify)
9 R	9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Generation, Transmission and Distribution of Electric Energy for Sale.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
John W. Fenker, Vice President	John W. Fenker	11-17-80

COMMENTS FOR OFFICIAL USE ONLY

C

Form Approved OMB No. 158-S20004

UMBER (enter from page 1)

D 0 0 4 6 5 2 9 6 4 8

FOR OFFICIAL USE ONLY

W DUP 2 DUP

DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D002	2370 Tons/Yr.	T	T01 T02 T04	
2	D007	1137 Tons/Yr.	T	T04	
3	D008				Included with above
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WAST (continued)

E. USE THIS SPACE TO LIST ADDITIONA OCESS CODES FROM ITEM D(1) ON PAG

'81 APR 14 PM 2 59

LEGAL RECORDS SECTION

EPA I.D. NO. (enter from page 1)

F	O	H	D	0	4	6	6	2	9	6	4	8	T/A	C
														6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail)*.

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail)*.

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
41 30 01 6	082 03 01 3

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
John W. Fenker, Vice Pres.	John W. Fenker	11.17.80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED

CONTINUE ON PAGE 5

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES — FOR DESCRIBING OTHER PROCESSES *(code "T")* — FOR EACH PROCESS E... INCLUDE DESIGN CAPACITY.

Periodically, boiler tubes are chemically cleaned to remove scale deposits. This pro... may generate up 274,000 gallons of liquid waste including the rinse. This waste is evaporated in the combustion chamber of the boiler. All requirements of part 265 subpart P are observed.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
For listed hazardous waste: For each listed hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.
Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

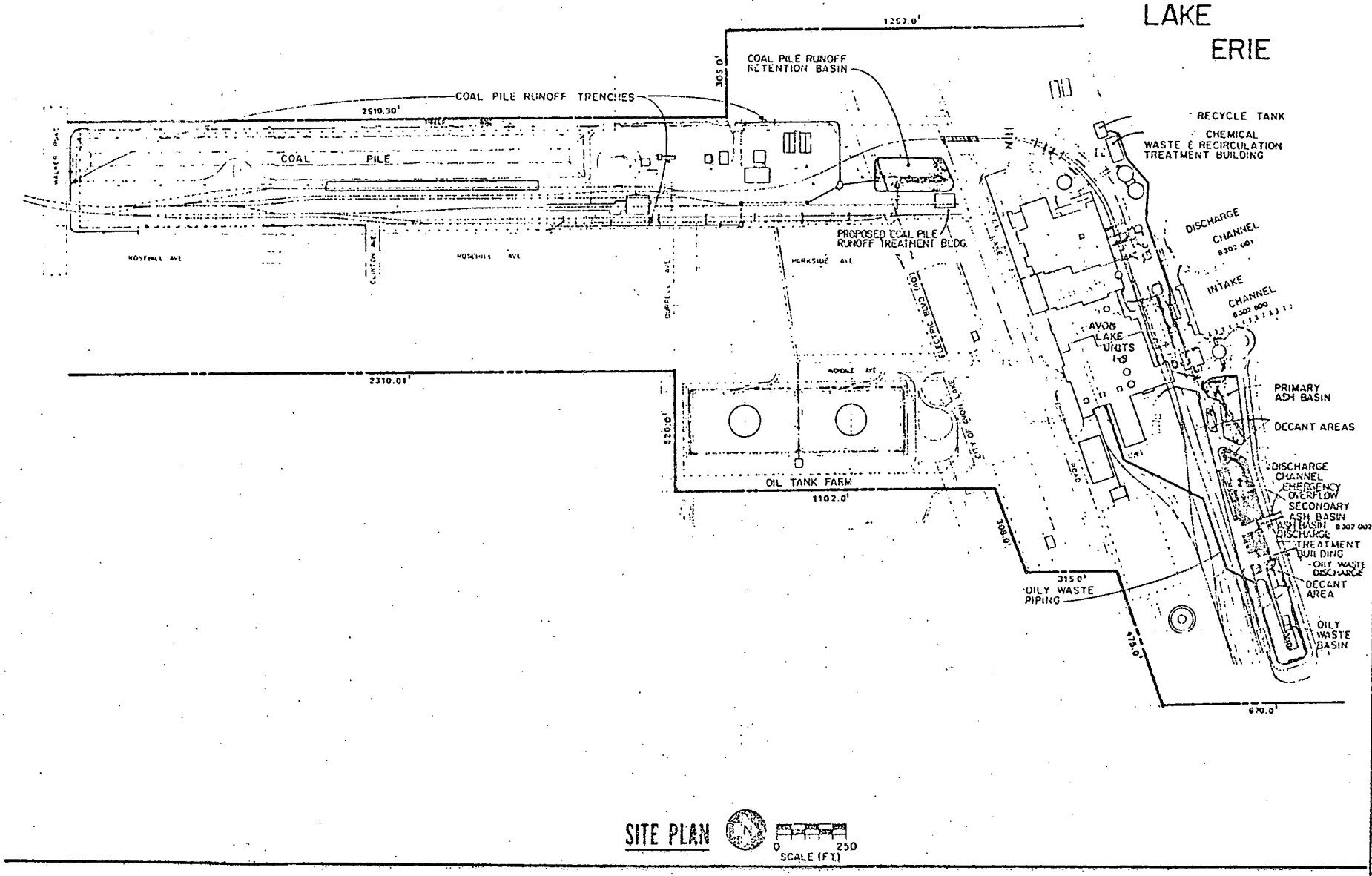
2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above



SITE PLAN

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

AVON LAKE PLANT

OH-0267

OhioEPA

RE: Application Number 81-HW-0269
Lorain County

September 4, 1981

William Roberts
Cleveland Electric Illuminating Company
Avon Lake Plant
33570 Lake Road
Avon Lake, Ohio 44012

Dear Mr. Roberts:

On July 29, 1981, 1981, Gary Gifford of the Ohio Environmental Protection Agency conducted an inspection of your facility, as part of the Hazardous Waste facility permit review proces. Your facility was represented by Robert Wykoff.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

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:rfs

cc: Kathleen Homer, U.S. EPA, Region V
Gary Gifford, NEDO

CERTIFIED MAIL

RECEIVED
SEP - 8 1981
OHIO ENVIRONMENTAL PROTECTION AGENCY
N. E.

DEFICIENCY NOTIFICATION TABLE
ISS INSPECTION

FACILITY NO. - 8-4W-0269
OWNER - Cleveland Electric Illuminating Co
FACILITY NAME - Avon Lake Plant
FACILITY LOCATION - 33570 Lake Rd. Avon Lake, Ohio 44012
FACILITY CONTACT - William Roberts PHONE NO. - (216) 622-980
ISS INSPECTION DATE - 7/29/81

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			
			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	B		
			3	"	"			
			4	"	"			
			5	"	"	B		
7		B	1	3745-55-53	265.53	C		
		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	"	"	B		
9	VII	A	1	3745-56-03	265.112	B		
			2	"	"	B		
			3	"	"			
			4	3745-56-32	265.142	B		
		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	B		
		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	O U
	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	122.5			
		(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	"			

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 20 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.

STATE IDENTIFICATION NUMBER
81-HW- 0269

EPA IDENTIFICATION NUMBER
OHD046629648

TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A.- General Facility Standards

I. General Information:

(A) Facility Name: Avon Lake Plant, CEI

(B) Street: 33570 Lake Road

(C) City: Avon Lake (D) State: Ohio (E) Zip Code: 44012

(F) Phone: 216 622 9800 / 87 x 226 (G) County: Lorain

(H) Operator: Cleveland Electric Illuminating Co

(I) Street: P.O. Box 5000

(J) City: Cleveland (K) State: Ohio (L) Zip Code 44101

(M) Phone: 2166229800 (N) County: Cuyahoga

(O) Owner: Cleveland Electric Illuminating Co

(P) Street: P.O. Box 5000

(Q) City: Cleveland (R) State: Ohio (S) Zip Code: 44101

(T) Phone: 2166229800 (U) County: Cuyahoga

(V) Date of Inspection: 7-29-81 (W) Time of Inspection (From) 9:00 (To) 4:00

(X) Weather Conditions: pty cloudy, cool, clear

(Y) Person(s) Interviewed	Title	Telephone
Bill Roberts	plant manager	2166229800/87226
Randy Hahn	plant environmentalist	"
R. Wykoff	chemical engineer RCRA coordinator	2166229800
S. Washington		

(Z) Inspection Participants	Agency/Title	Telephone
same		

(AA) Preparer Information

Name	Agency/Title	Telephone
Gary Gifford	OEPA/ES II	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 sections 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?	—	✓	—	
2. Facility expansion?	—	✓	—	
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓	—	—	information included in general unit files; also, on file in corporate offices
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓	—	—	
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	—	—	N/A
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	✓	—	—	
2. Artificial or natural barrier around facility?	✓	—	—	levees
3. Controlled entry?	✓	—	—	
4. Danger sign(s) at entrance?	✓	—	—	area of cleaning is roped + flagged to announce operation
D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	✓	—	—	(A)
2. Records of operator error?	✓	—	—	
3. Records of discharges?	✓	—	—	

Not Inspected

	Yes	No	NI*	Remarks
4. Inspection schedule?	✓			B
5. Safety, emergency equipment?	✓			C
6. Security devices?	✓			B
7. Operating and structural devices?	✓			B
8. Inspection log?	✓			A
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	✓			D
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?				
1. Special handling?				N/A
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?			✓	no cleaning during inspection
(B) If required, does the facility have the following equipment:				
1. Internal communications or alarm systems?	✓			plant P.A. system
2. Telephone or 2-way radios at the scene of operations?	✓			both used during a cleaning
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			(E)

Indicate the volume of water and/or foam available for fire control:
water available throughout plant - could be used for decontamination

(C) Testing and Maintenance of Emergency Equipment:				
1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			(F)
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 aisle space for unobstructed movement? ✓

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?		✓		(G)
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?	✓			included in SPCC plan (see also (E)) and in plant fire fighting plan
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?)		✓		(G) – also plant must be staffed at all times during normal operation

*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?		✓		see (G)
(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?	✓			(H)

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?				N/A
2. Are records of past shipments retained for 3 years?				N/A
(B) Does the owner or operator meet requirements regarding manifest discrepancies?				N/A

*Not Inspected

(C) Operating Record

1.	Does the owner or operator maintain an operating record as required in 265.73?	✓	—	—	see (A)
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?	✓	—	—	
c.	The location and quantity of each hazardous waste within the facility?	—	—	—	N/A
***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?	✓	—	—	process chemical analysis are on file
f.	Reports detailing all incidents that required implementation of the Contingency Plan?	✓	—	—	
g.	All closure and post closure costs as applicable? (Effective 5-19-81)	—	✓	—	(I)

** 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
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	—	—	—	I
2. Has this plan been submitted to the Regional Administrator	—	—	—	
3. Has closure begun?	—	—	—	
4. Is closure estimate available by May 19, 1981?	—	—	—	
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)	—	—	—	

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

N/A

Facility 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?	—	—	—	
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		Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	—	—	—	
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	—	—	—	

J
TANKS

Facility Name: CEI Avon Lake Date of Inspection: ~~7~~ 8/29/81

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	✓	—	—	(J)
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	✓	—	—	see (B)
3. Do continuous feed systems have a waste-feed cutoff?	✓	—	—	
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	✓	—	—	(J)
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.)	—	—	—	N/A
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: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K SURFACE IMPOUNDMENTS N/A

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 N/A

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 imcompatible waste protected by barriers or distance from other waste?				

*Not Inspected

M

N/A

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/A

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.	___	___	___	_____
(E) 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.	___	___	___	_____
(F) 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?	___	___	___	_____
(G) 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?	___	___	___	_____

*Not Inspected

O and P
INCINERATION and THERMAL TREATMENT

(A) Facility Name: CEI Avon Lake

(B) Date of Inspection: 7/29/81

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): waste fed into operating furnace boilers (steady state operation)

B. Components and steady state condition:

**** Was this component at SS prior to adding waste?

	Component	Yes	No	NI*	Remarks
1.					see A.1
2.					
3.					
4.					
5.					

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

	1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
a.	Heating value		✓		(K)
b.	Halogen content		✓		
c.	Sulfur content		✓		

*Not Inspected

	Yes	No	NI*	Remarks
2. Has documented or written data been substituted for analysis of either:				
a. Lead?	___	✓	___	(K)
b. Mercury?	___	✓	___	

B. 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 tested.)

		Remarks
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____

III. Monitoring and Inspections

	Yes	No	NI*	Remarks
A. Are combustion/emission control instruments monitored at least every 15 minutes?	___	___	___	(L)
B. Is steady state maintained or corrections attempted?	___	___	___	_____
C. Is stack plume observed at least hourly for normal color and opacity?	___	___	___	_____
D. Did any stack observations made by owner or operator show a plume different than normal?**	___	___	___	_____
E. If yes to D above, were corrections made to return emissions to normal appearance?**	___	___	___	_____
F. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	_____
G. Are emergency shutdown controls and system alarms checked daily for proper operation?	___	___	___	_____

*Not Inspected
**Specify in Remarks for what period of time this was checked.

IV. Open Burning

N/A

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: CEI Avon Lake

Date of Inspection: 7-29-81

N/A

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	✓	—	—	M
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	✓	—	—	

*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?				N/A
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)				N/A

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

N/A

	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?	___	___	___	_____

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)

Has the installation imported or exported Hazardous Waste?	___	___	___	_____

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
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?	___	___	___	_____

*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.

X

TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste. N/A

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

Comments

(A) An operations log is maintained by plant during each cleaning, detailing each step of the operation

(B) Continuous monitoring, by plant and cleaning contractor, is standard procedure during a cleaning

(C) Standard plant safety and security measures are available during a cleaning, including first aid, fire fighting, and spill containment equipment.

(D) Standard plant employee training is augmented by special plant/contractor cleaning training

(E) Plant safety equipment includes mounted and portable fire extinguishers, foam units.

(F) Routine inspections performed by plant and outside contractors/agencies

(G) Company does not feel operation warrants special outside arrangements or evacuation plan

(H) HAF spill (6/22/81) resulted in partial discharge to Lake via NPDES sump - plant discovered spill and reacted appropriately as per plan

(I) Company does not believe closure info needed - as no cleaning would take place after closure

(J) Tanks are used only for designed purpose - containment of wash solutions

(K) As thermal treatment of this waste has occurred for several years, this analysis has not been conducted. Feed rate is minimal to prevent boiler upset.

(L) Normal P.T.O. monitoring carried out at all times - no additional monitoring during cleaning
see also (B)

(M) Plant uses both Vertec and HAF cleaning methods. While both systems are normally treated thermally, chemical treatment is possible through the NPDES system (neutralization + metals + solids removal)

(N) Company notes that application waste volumes include delisted regenerant neutralization wastes

STATE IDENTIFICATION NUMBER
81-HW- 0269

EPA IDENTIFICATION NUMBER
OHD046629648

TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A.- General Facility Standards

I. General Information:

(A) Facility Name: Avon Lake Plant, CEI

(B) Street: 33570 Lake Road

(C) City: Avon Lake (D) State: Ohio (E) Zip Code: 44012

(F) Phone: 216 622 9800/87+226 (G) County: Lorain

(H) Operator: Cleveland Electric Illuminating Co

(I) Street: P.O. Box 5000

(J) City: Cleveland (K) State: Ohio (L) Zip Code 44101

(M) Phone: 2166229800 (N) County: Cuyahoga

(O) Owner: Cleveland Electric Illuminating Co

(P) Street: P.O. Box 5000

(Q) City: Cleveland (R) State: Ohio (S) Zip Code: 44101

(T) Phone: 2166229800 (U) County: Cuyahoga

(V) Date of Inspection: 7-29-81 (W) Time of Inspection (From) 9:00 (To) 4:00

(X) Weather Conditions: pty cloudy, cool, clear

(Y) Person(s) Interviewed	Title	Telephone
Bill Roberts	plant manager	2166229800/87226
Randy Hahn	plant environmentalist	"
R. Wykoff	chemical engineer RCRA coordinator	2166229800
E. Washington		

(Z) Inspection Participants	Agency/Title	Telephone
same		

(AA) Preparer Information

Name	Agency/Title	Telephone
Mary Stafford	OEPA/ES II	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 sections 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?	—	✓	—	
2. Facility expansion?	—	✓	—	
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓	—	—	information included in general unit files; also, on file in corporate offices
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓	—	—	
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	—	—	N/A
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	✓	—	—	
2. Artificial or natural barrier around facility?	✓	—	—	fences
3. Controlled entry?	✓	—	—	
4. Danger sign(s) at entrance?	✓	—	—	area of cleaning is roped + flagged to announce operation
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	✓	—	—	(A)
2. Records of operator error?	✓	—	—	
3. Records of discharges?	✓	—	—	

*Not Inspected

	Yes	No	NI*	Remarks
4. Inspection schedule?	✓			B
5. Safety, emergency equipment?	✓			C
6. Security devices?	✓			B
7. Operating and structural devices?	✓			B
8. Inspection log?	✓			A
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	✓			D
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?				
1. Special handling?				N/A
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?			✓	no cleaning during inspection
(B) If required, does the facility have the following equipment:				
1. Internal communications or alarm systems?	✓			plant P.A. system
2. Telephone or 2-way radios at the scene of operations?	✓			both used during a cleaning
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			(E)

Indicate the volume of water and/or foam available for fire control:

water available throughout plant - could be used for decontamination

(C) Testing and Maintenance of Emergency Equipment:				
1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			(F)
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 aisle space for unobstructed mc ent? ✓

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?		✓		(G)
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?	✓			included in SPCC plan, (see also (E)) and in plant fire fighting plan
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?)		✓		(G) – also plant must be staffed at all times during normal operation

*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?		✓		see (G)
(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?	✓			(H)

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?				N/A
2. Are records of past shipments retained for 3 years?				N/A
(B) Does the owner or operator meet requirements regarding manifest discrepancies?				N/A

*Not Inspected

(C) Operating Record

1.	Does the owner or operator maintain an operating record as required in 265.73?	✓	—	—	see (A)
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?	✓	—	—	
c.	The location and quantity of each hazardous waste within the facility?	—	—	—	N/A
***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?	✓	—	—	process chemical analysis are on file
f.	Reports detailing all incidents that required implementation of the Contingency Plan?	✓	—	—	
g.	All closure and post closure costs as applicable? (Effective 5-19-81)	—	✓	—	(I)

** 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
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	—	—	—	I
2. Has this plan been submitted to the Regional Administrator	—	—	—	
3. Has closure begun?	—	—	—	
4. Is closure estimate available by May 19, 1981?	—	—	—	
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)	—	—	—	

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

n/A

Facility 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?	—	—	—	
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	N	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)				
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				

J
TANKS

Facility Name: CEI Avon Lake Date of Inspection: 8/29/81

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	✓			(J)
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	✓			see (B)
3. Do continuous feed systems have a waste-feed cutoff?	✓			
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	✓			(J)
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.)				N/A
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: _____ gallons

   Tank diameter: _____ feet

   Distance of tank from property line _____ feet

   (See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS N/A

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 N/A

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 imcompatible waste protected by barriers or distance from other waste?				

*Not Inspected

M

N/A

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/A

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.	___	___	___	_____
E) 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.	___	___	___	_____
F) 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?	___	___	___	_____
G) 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?	___	___	___	_____

Not Inspected

O and P
INCINERATION and THERMAL TREATMENT

(A) Facility Name: CEI Avon Lake

(B) Date of Inspection: 7/29/81

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): waste fed into operating furnace boilers (steady state operation)

B. Components and steady state condition:

**** Was this component at SS prior to adding waste?

	Component	Yes	No	NI*	Remarks
1.					see A.1
2.					
3.					
4.					
5.					

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

	1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
a.	Heating value		✓		(K)
b.	Halogen content		✓		
c.	Sulfur content		✓		

*Not Inspected

	Yes	No	NI*	Remarks
2. Has documented or written data been substituted for analysis of either:				
a. Lead?	___	✓	___	(K)
b. Mercury?	___	✓	___	

B. 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 tested.)

	Remarks
1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____
5. _____	_____

III. Monitoring and Inspections

	Yes	No	NI*	Remarks
A. Are combustion/emission control instruments monitored at least every 15 minutes?	___	___	___	(L)
B. Is steady state maintained or corrections attempted?	___	___	___	
C. Is stack plume observed at least hourly for normal color and opacity?	___	___	___	
D. Did any stack observations made by owner or operator show a plume different than normal?**	___	___	___	
E. If yes to D above, were corrections made to return emissions to normal appearance?**	___	___	___	
F. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	
G. Are emergency shutdown controls and system alarms checked daily for proper operation?	___	___	___	

*Not Inspected
**Specify in Remarks for what period of time this was checked.

IV. Open Burning

N/A

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: CEI Avon Lake

Date of Inspection: 7-29-81

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	✓	___	___	M
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	✓	___	___	_____

*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?				N/A
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)				N/A

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

N/A

	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?	___	___	___	_____

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)

Has the installation imported or exported Hazardous Waste?	___	___	___	_____

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
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?	___	___	___	_____

*Not Inspected

X

TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste. N/A

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.

Comments

(A) An operations log is maintained by plant during each cleaning, detailing each step of the operation

(B) Continuous monitoring, by plant and cleaning contractor, is standard procedure during a cleaning

(C) Standard plant safety and security measures are available during a cleaning, including first aid, fire fighting, and spill containment equipment.

(D) Standard plant employee training is augmented by special plant/contractor cleaning training

(E) Plant safety equipment includes mounted

(I) Company does not believe closure info needed - as no cleaning would take place after closure

(J) Tanks are used only for designed purpose - containment of wash solutions

(K) As thermal treatment of this waste has occurred for several years, this analysis has not been conducted. Feed rate is minimal to prevent boiler upset.

(L) Normal P.T.O. monitoring carried out at all times - no additional monitoring during cleaning
see also (B)