



September 18, 2026

Justin Tucker
Freepoint Eco-Systems
522 Milliken Drive
Hebron, OH 43025

**Re: Freepoint Eco-Systems
Notice of Violation (NOV)
Related Correspondence
RCRA C - Hazardous Waste
Licking County
OHD987044914**

Hazardous Waste Program - DERR

Subject: Complaint, FCI Inspection Report Transmittal Letter

Dear Mr. Tucker:

Thank you for accompanying me during Ohio EPA's August 24, 2026, Focused Compliance Inspection (FCI) of Freepoint Eco-Systems' facility located at 522 Milliken Drive, Hebron, OH 43025. The inspection included a review of Freepoint Eco-Systems' operations and written documentation associated with facility operations.

Enclosed is the September 18, 2026, Notice of Violation / Partial Resolution of Violation (NOV/PROV) letter outlining the violations that were observed during the August 24, 2026, inspection. Also included in this package is the complete inspection report which contains the site verification form, an inspection narrative, completed inspection checklists, and photographs of violations.

Please be advised that this inspection report is only associated with those areas of the operations that were inspected or documentation reviewed and does not constitute a waiver of potential violations not discovered.

You can find Ohio's hazardous waste rules and other information on the division's web page at: <https://epa.ohio.gov/divisions-and-offices/environmental-response-revitalization>.

Should you have any questions, please contact me at (614) 387-6181 or Mason.Harris@epa.ohio.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Mason B Harris". The signature is fluid and cursive, with the first name "Mason" followed by a large "B" and then "Harris".

Mason Harris
Hazardous Waste Program
Division of Environmental Response and Revitalization (DERR)

cc. Martin Smith, DERR
Andy Maneff, DERR
Zak Kabelen, DERR

Enclosure



September 18, 2026

Justin Tucker
Freepoint Eco-Systems
522 Milliken Drive
Hebron, OH 43025

**Re: Freepoint Eco-Systems
Notice of Violation (NOV)
NOV
RCRA C - Hazardous Waste
Licking County
OHD987044914**

Hazardous Waste Program - DERR

Subject: Complaint, #260803070834_WEC, FCI, Notice of Violation / Partial Resolution of Violation

Dear Mr. Tucker:

Thank you for accompanying me during Ohio EPA's August 24, 2026, complaint investigation of Freepoint Eco-Systems located at 522 Milliken Drive, Hebron, Ohio 43025. The goal of the Focused Compliance Inspection (FCI) was to investigate the validity of the complaint #260803070834_WEC, which alleged improper hazardous waste management. The investigation was also conducted to determine Freepoint Eco-Systems' compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and the rules adopted pursuant to ORC § 3734.12 found in Chapter 3745 of the Ohio Administrative Code (OAC). The investigation included a review of the complaint allegation, Freepoint Eco-Systems' operations and written documentation associated with facility operations as they relate to the complaint.

Findings

Ohio EPA determined the complaint was valid and observed the following violations of Ohio's hazardous waste laws and rules. To bring Freepoint Eco-Systems into compliance, Ohio EPA recommends promptly addressing these violations within 14 days of your receipt of this letter.

- 1. OAC Rule 3745-52-17(A)(5)(a)(i), Labeling and marking of containers and tanks:** A large quantity generator shall mark or label the generator's containers with the words "Hazardous Waste."

During the investigation, the roll-off dumpster containing benzene wastewater and sludge (D018) next to the hazardous waste storage frac tank was not labeled with the words “Hazardous Waste.”

On August 24, 2026, Ohio EPA received Freepoint Eco-Systems’ response which included images of the roll-off labeled with the words “Hazardous Waste.” **Therefore, this violation has been resolved.**

2. **OAC Rule 3745-52-17(A)(5)(a)(iii), Labeling and marking of containers and tanks:** A large quantity generator shall clearly mark or label the generator’s containers with the date upon which each period of accumulation or treatment begins.

During the investigation, the roll-off dumpster next to the frac tank, and two roll-off dumpsters in the southeast corner of the same gravel lot (all containing benzene wastewater and sludge, D018) were not dated at the time of inspection.

On August 24, 2026, Ohio EPA received Freepoint Eco-Systems’ response which included images of the roll-off dumpsters with a start date of accumulation. **Therefore, this violation has been resolved.**

3. **OAC Rule 3745-52-17(A)(1)(d)(i), Management of containers:** A container holding hazardous waste shall always be closed during accumulation, except when it is necessary to add or remove waste.

During the investigation, the roll-off dumpster containing benzene wastewater and sludge (D018) next to the hazardous waste storage frac tank was partially uncovered.

On August 24, 2026, Ohio EPA received Freepoint Eco-Systems’ response which included an image of the roll-off dumpster with the cover tarp properly affixed. **Therefore, this violation has been resolved.**

4. **OAC Rule 3745-66-92(A), Tank systems requirements, design and installation of new tank systems or components:** Owners or operators of new tank systems or components shall ensure that the foundation, structural support, seams, connections, and pressure controls (if applicable) are adequately designed and that the tank system has sufficient structural strength, compatibility with the wastes to be stored or treated, and corrosion protection so that the tank system will not collapse, rupture, or fail. The owner or operator shall obtain a written assessment reviewed and certified by a qualified professional engineer in accordance with paragraph (D) of rule 3745-50-42 of the Administrative Code attesting that the system has sufficient structural integrity and is acceptable for storing and treating of hazardous waste.

During the investigation, a written tank assessment certified by a qualified professional engineer available for the hazardous waste storage frac tank was not available.

In order to resolve this violation, Ohio EPA recommends that Freepoint Eco-Systems obtain a written tank assessment certified by a qualified professional engineer for the hazardous waste storage frac tank and provide the document to this office for review or cease to use the tank.

- 5. OAC Rule 3745-66-92(G), Tank systems requirements, design and installation of new tank systems or components:** The owner or operator shall obtain and keep on file at the facility written statements by those persons required to certify the design of the tank system and supervise the installation of the tank system in accordance with the requirements of paragraphs (B) to (F) of this rule to attest that the tank system was properly designed and installed and that repairs, pursuant to paragraphs (B) and (D) of this rule, were performed. These written statements also shall include the certification statement as required in paragraph (D) of rule 3745-50-42 of the Administrative Code.

During the investigation, written statements by those persons required to certify the design of the tank system and supervise the installation of the tank system for the hazardous waste storage frac tank were not available.

In order to resolve this violation, Ohio EPA recommends that Freepoint Eco-Systems obtain written statements by those persons required to certify the design of the tank system and supervise the installation of the tank system for the hazardous waste storage frac tank and provide the document to this office for review or cease to use the tank.

- 6. OAC Rule 3745-66-93(E)(1)(a), Secondary containment, containment and detection of releases – tanks:** External liner systems shall be designed or operated to contain one hundred per cent of the capacity of the largest tank within the external liner system's boundary.

During the investigation, the external liner housing the hazardous waste storage frac tank was not designed to contain one hundred per cent of the capacity of the largest tank within the external liner system's boundary.

In order to resolve this violation, Ohio EPA recommends that Freepoint Eco-Systems install an external liner designed to contain one hundred per cent of the capacity of the largest tank within the external liner system's boundary or cease to use the tank and liner.

- 7. OAC Rule 3745-256-85(C)(1), Tanks – air emissions standards for tanks, surface impoundments, and containers:** The owner or operator shall determine the maximum organic vapor pressure for a hazardous waste to be managed in the tank using "Tank

Level 1” controls before the first time the hazardous waste is placed in the tank. The maximum organic vapor pressure shall be determined using the procedures specified in paragraph (C) of rule 3745-256-84 of the Administrative Code. Thereafter, the owner or operator shall perform a new determination whenever changes to the hazardous waste managed in the tank could potentially cause the maximum organic vapor pressure to increase to a level that is equal to or greater than the maximum organic vapor pressure limit for the tank design capacity category specified in paragraph (B)(1)(a) of this rule, as applicable to the tank.

During the investigation, the maximum organic vapor pressure for a hazardous waste to be managed in the hazardous waste storage frac tank using “Tank Level 1” controls was not available.

In order to resolve this violation, Ohio EPA recommends that Freepoint Eco-Systems determine the maximum organic vapor pressure for a hazardous waste to be managed in the hazardous waste storage frac tank using “Tank Level 1” controls and provide the document to this office for review or cease to use the tank.

- 8. OAC Rule 3745-256-90(B)(2)(a), Recordkeeping – tanks, surface impoundments, and containers:** The owner or operator using a fixed roof to comply with the “Tank Level 1” control requirements specified in paragraph (C) of rule 3745-256-85 of the Administrative Code shall prepare and maintain records for each determination for the maximum organic vapor pressure of the hazardous waste in the tank performed in accordance with the requirements of paragraph (C) of rule 3745-256-85 of the Administrative Code. The records shall include the date and time the samples were collected, the analysis method used, and the analysis results.

During the investigation, records from determinations of the maximum organic vapor pressure for a hazardous waste to be managed in the hazardous waste storage frac tank using “Tank Level 1” controls was not available.

In order to resolve this violation, Ohio EPA recommends that Freepoint Eco-Systems determine the maximum organic vapor pressure for a hazardous waste to be managed in the hazardous waste storage frac tank using “Tank Level 1” controls and provide the document to this office for review or cease to use the tank.

- 9. OAC Rule 3745-256-87(C)(3), Containers – tanks, surface impoundments, and containers:** Whenever a hazardous waste is in a container using “Container Level 1” controls, the owner or operator shall install all covers and closure devices for the container, as applicable to the container, and secure and maintain each closure device in the closed position except as listed in subsections (a) through (e) of this rule.

During the investigation, the roll-off dumpster containing benzene wastewater and sludge (D018) next to the hazardous waste storage frac tank was partially uncovered.

On August 24, 2026, Ohio EPA received Freepoint Eco-Systems' response which included an image of the roll-off dumpster with the cover tarp properly affixed. **Therefore, this violation has been resolved.**

Conclusion

The Ohio EPA requests that Freepoint Eco-Systems promptly undertake the necessary measures to return to compliance with Ohio's environmental laws and rules. Within 14 days of receipt of this letter, please provide documentation to Ohio EPA of the actions taken to resolve the violations cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs as appropriate may be submitted via the postal service or electronically to Mason.Harris@epa.ohio.gov.

Please be advised that violations cited above will continue until the violations have been properly resolved. Failure to comply with Chapter 3734. of the ORC and rules promulgated thereunder may result in an administrative or civil penalty.

The submission of any requested information in response to this letter does not constitute waiver of the Ohio EPA's authority to seek administrative or civil penalties as provided in Chapter 3734. of the ORC.

This NOV is only associated with the areas of the operations that were inspected or the documentation reviewed and does not constitute a waiver of potential violations not discovered.

A copy of the investigation report including completed checklists will be sent with a separate letter. You can find Ohio's hazardous waste rules and other information on the division's web page at: <https://epa.ohio.gov/divisions-and-offices/environmental-response-revitalization>.

Should you have any questions, please contact me at (614) 387-6181 or Mason.Harris@epa.ohio.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Mason B Harris".

Mason Harris

Hazardous Waste Program

Division of Environmental Response and Revitalization (DERR)

cc. Martin Smith, DERR

Andy Maneff, DERR

Zak Kabelen, DERR

EPA.RCRAInfoData@epa.ohio.gov

**HAZARDOUS WASTE PROGRAM - DERR
INSPECTION REPORT FORM
OHIO EPA**

FACILITY	Freepoint Eco-Systems	US EPA ID#	OHD987044914
INSPECTION DATE	8/24/2026	Generator Status	LQG, SQHUW, Used Oil
Facility Contact (s)	Justin Tucker, Director, Head of HSE, JTucker@freepoint.com	(713) 806-3280	
EPA Inspector (s)	Mason Harris, DERR-HW		

PRE-INSPECTION INFORMATION / FACILITY BACKGROUND

On 8/3/2026, Ohio EPA received a complaint logged as #260803070834_WEC, alleging that at Freepoint Eco-Systems, located at 522 Milliken Drive, Hebron, Ohio 43025, hazardous waste was being improperly managed. On 8/21/2026, this complaint was forwarded to Mason Harris, DERR-HW, for investigation.

Freepoint Eco-Systems operated a pyrolysis process at their facility, turning post-consumer and post-industrial plastics back into hydrocarbons for the last two years. Per a review of available hazardous waste manifests and a previous complaint inspection conducted by DERR-HW on 2/19/2025, Freepoint Eco-Systems was actively generating large volumes of liquid and solid debris waste containing benzene (D018). These shipments have been occurring regularly since October of 2025, and waste has been shipped by tanker trucks, roll-offs, totes, and super sacks. Freepoint Eco-Systems first notified Ohio EPA as a Small Quantity Generator (SQG) of hazardous waste on 12/3/2024 and updated the facility status to Large Quantity Generator (LQG) on 7/1/2025. A Biennial Report was submitted on 3/1/2026, reporting over 912 tons of hazardous waste for 2025.

Several months prior to the complaint investigation, DERR met with Freepoint Eco-Systems regarding the facility's closure in 2026, and the expectations and timeline associated with filing for Ohio EPA's Cessation of Regulated Operations (CRO) program. Additionally, Ohio EPA's Division of Air Pollution Control (DAPC) has been in enforcement negotiations with the facility for some time.

Prior to the inspection, aerial photographs of the site were reviewed, and property ownership was verified with Licking County online records.

PURPOSE OF INSPECTION

An unannounced Focused Compliance Inspection (FCI) of Freepoint Eco-Systems (hereinafter "FES" or "facility") located at 522 Milliken Drive, Hebron, Ohio 43025, took place on 8/24/2026. The Complaint FCI was conducted by the Ohio Environmental Protection Agency (Ohio EPA) as an evaluation of the facility's compliance with certain provisions of Ohio's hazardous waste regulations found in the Ohio Administrative Code. The Complaint FCI was a routine evaluation of FES' compliance with the regulations governing large quantity generators of hazardous waste, including the RCRA organic air emission standards, where applicable.

ARRIVAL ON-SITE

I arrived at the site at 9:45 AM. I stopped at the security gatehouse and explained the complaint and purpose of my inspection. I asked to see FES' environmental compliance manager or a person in a similar role. I was instructed to drive through the gate, south and east around the facility building, and park at the office trailer building, where I would be met by Mr. Justin Tucker.

ENTRANCE INTERVIEW

Justin Tucker, Director, Head of HSE at FES and Nils Rasmussen, of the compliance and management group at the facility, greeted me in the office conference room. After brief introductions and explaining the complaint Ohio EPA received, I asked FES to go over the facility's hazardous waste management procedures, generation from the last couple of years, and activities since the facility had closed.

FES stated that the facility had been closed since May of 2026. Operations since that point have included shipping off remaining products, shipping off remaining waste, and decommissioning and cleaning out equipment, the pyrolysis lines, and tanks. These cleanouts have continued to generate a significant amount of hazardous waste.

FES stated that production on-site was up and down since opening in late 2024 and for most of 2025 but ramped back up in late 2025. This coincided with the large volumes of waste that were reported in the facility's 2026 Biennial Report. The large number of waste shipments continued into 2026. Mr. Tucker explained that a process change resulted in the char (solid hydrocarbon debris that drops out of the process after heating), testing hazardous for benzene (D018) in December of 2025. This material was collected in drums and supersacks when pyrolysis was operational. According to FES, hazardous char waste (D018) had not been on-site for several weeks. Cleanout activities continued to generate large volumes of liquid and sludge waste containing benzene (D018), which had been stored in totes, roll-offs, and a frac tank. Petroleum distillates containing benzene (D001, D018) were shipped to the Valicor plant in Dayton, OH (OHD004274031), and the char and other benzene-containing solids (D018) were shipped to Clean Harbors El Dorado in El Dorado, AR (ARD069748192). We agreed to look at the frac tank in greater detail during the walk-through, as it might trigger hazardous waste storage tank regulations.

FES indicated that the wastewater treatment unit was removed from the site, and the last few railcars of hydrocarbons were in the process of being shipped off-site. The facility's hazardous waste drum storage room was no longer in use. I explained the facility's obligation to meet the closure performance standards for this central accumulation area. FES also explained that the current plan was to file for CRO once all cleanout activities are complete, which would be sometime in the next 2-3 months.

After a review of current site operations and day-to-day activities, we agreed to begin the facility walk-through.

FACILITY WALK-THROUGH

We first traveled west to the drum storage room, which was empty at the time of inspection. The necessary signage and spill kits were present, but Mr. Tucker again stated that the area would no longer be used to store hazardous waste.

Making our way to the frac tank area, we moved east and stopped at the heating and condenser area on the east side of the main building. We observed the generation point for hazardous char waste (D018), where drums and super sacks were used in 2025 and 2026 to accumulate char. 6-7 drums and 1-2 super sacks were generated per day when the pyrolysis line was running. No waste was present in this area at the time of inspection, which is considered a central accumulation area for hazardous waste closure obligations.

Next, we moved north and stopped at a gravel lot in the northeast corner of the property. On the eastern side of the gravel lot were the hazardous waste frac tank and a hazardous waste roll-off. The frac tank is used for storing liquid benzene waste and petroleum distillates (D001, D018) generated from cleanout and decommissioning activities and was nearly empty at the time of inspection. The tank was labeled appropriately, sitting in a secondary containment liner that covered the area around the bottom of the tank, and was not mobile. There was one pressure relief valve, but no other vents or ancillary equipment associated with this frac tank. The roll-off is used to store benzene wastewater and sludge (D018) generated from cleanout and decommissioning activities, had the tarp partially removed, and was not labeled or dated at the time of inspection. The roll-off was also sitting in a secondary containment liner. Freepoint was informed of the labeling requirements for these items.

On the southern side of the gravel lot were three other roll-off dumpsters. Two of the dumpsters were labeled as hazardous waste liquid containing benzene (D018) but were not dated. These dumpsters contained a small amount of waste. The third dumpster was not labeled as hazardous waste and was empty at the time of inspection. Freepoint was informed of the labeling requirements for these items. We also discussed the closure performance standards for central accumulation areas on-site, of which the roll-offs, frac tank, hazardous char waste generation point, and drum room would all qualify.

FACILITY RECORDS

Following the inspection, pictures, TCLP analytical results, a tank spec sheet, daily inspection logs, and waste disposal profiles were reviewed.

EXIT INTERVIEW

I explained to FES that I would discuss my inspection findings regarding the labeling and tank concerns with my team back at the office. I would also confer with them on CRO timing. We touched on the organic air emissions rules for hazardous waste sources due to the benzene content in FES' waste streams, and I agreed to look into the applicability of those regulations to FES. I explained the process for a compliance letter and inspection report and departed the facility around 11:15 AM.

POST INSPECTION FOLLOW-UP

In the afternoon following the FCI, FES sent pictures of labeled, dated, and covered roll-offs; resolving those violations. TCLP analytical results for the hazardous char (D018) were also provided.

On 8/27/2026, Ohio EPA notified FES that based on the inspection, labeling and hazardous waste tank citations

would be issued in a Notice of Violation letter. Additionally, this email notification documented the central accumulation areas observed during the inspection and recommended that FES file for CRO.

On 8/31/2026, FES and their consultant, T&M Associates, requested a meeting with Ohio EPA to discuss the timing of the facility's CRO filing. A meeting was scheduled for the morning of 9/10/2026.

On 9/1/2026, FES provided a spec sheet and daily inspection logs for the frac tank.

On 9/2/2026, waste disposal profiles for the hazardous char waste (D018) and hazardous liquid benzene waste (D001, D018) were provided. Per these profiles, the benzene waste is subject to the RCRA organic air emissions rules.

On 9/10/2026, a meeting was held between Ohio EPA, FES, and T&M Associates. During the meeting, it was established that FES was nearly finished with regulated activity. The facility planned to continue flaring and conducting activities subject to their air permit for another 1-2 weeks. Upon conclusion of permitted air activities and notification to Ohio EPA, FES would also file for CRO. The facility explained that waste generation from tank cleaning would finish in the next few weeks. A discussion on the timeline for requesting a CRO extension, as well as potentially incorporating the DERR violations into DAPC's Director's Final Findings and Orders (DFFO's) was held. FES preferred to include language in the coming DAPC DFFO's that covers the violations from DERR, which would be issued in a NOV/PROV letter.

CHECKLIST COMPLETED

Generator Checklist:	Yes ☒ No ☐ N/A ☐	LDR Checklist	Yes ☐ No ☒ N/A ☐
Universal Waste:	Yes ☐ No ☒ N/A ☐	Used Oil Checklist	Yes ☐ No ☒ N/A ☐
CRO	Yes ☐ No ☒ N/A ☐	RCRA Organic Air CC Container Checklist	Yes ☒ No ☐ N/A ☐
RCRA Organic Air CC Tank Checklist	Yes ☒ No ☐ N/A ☐	RCRA Organic Air BB Equipment Leak Checklist	Yes ☐ No ☒ N/A ☐
Other Checklist	LQG Tank Checklist		

ATTACHMENTS

- A. RCRA Site Identification/Verification Form
- B. Inspection Photographs
- C. Inspection Checklists
- D. Complaint Report

Ohio EPA RCRA Subtitle C Verification Form- Inspector Use

Email Completed Forms to EPA.RCRAInfoData@epa.ohio.gov

Inspector's Name + District Mason Harris, CDO		Date of Inspection (Day One) 08/24/2026		Complaint Investigation? ☒ Yes ☐ No						
Evaluation Type: CEI, FCI, FUI, GME, OAM, FSD, CAC, CAV, NRR, CDI, etc		FCI		FCI Focus Area (Must List One if Eval Type is FCI): OTH, UOI, UWR, ISI, CAR, CPC, IEC, etc			OTH			
Site EPA ID Number		EPA ID Number: OHD987044914								
Site Name		Name: Freepoint Eco-Systems								
Site Location Information		Street Address: 522 Milliken Dr								
		City: Hebron			State: OH					
		County Name: Licking			Zip Code: 43025					
Latitude/Longitude		Latitude/Longitude: 39.983641, -82.476202								
Site Land Type		Private ☒	County ☐	District ☐	Federal ☐	Indian ☐	Municipal ☐	State ☐	Other ☐	
NAICS Code(s)		324110								
Facility Representative		First Name: Justin				Last Name: Tucker				
Additional names can be recorded in the space provided on the next page. Provide address information if it is different than the site address.		Title: Director, Head of HSE								
		Phone Number: (713) 806-3280					Phone Number Ext:			
		E-Mail Address: jtucker@freepoint.com								
		Fax Number:					Fax Number Ext:			
		Street or P.O. Box:								
		City:			Zip Code:					
		State:								
Legal Owner and Operator of the Site		Name of Site's Legal Owner: Hebron Business Park LTD			Date Became Owner (mm/dd/yyyy):					
List Additional Owners and/or Operators in the Comments Section. Provide address information when known even if it is the same as above.		Owner Type:	Private ☒	County ☐	District ☐	Federal ☐	Indian ☐	Municipal ☐	State ☐	Other ☐
		Street/PO Box: Ohio Realty Advisors LTD 4020 Kinross Lakes Pkwy, Suite 200			City: Richfield		State: OH			
		Zip Code: 44286		Country: USA		Owner's Phone #:				
		Name of Site's Operator: Freepoint Eco-Systems			Date Became Operator (mm/dd/yyyy): 12/03/2024					
		Operator Type:	Private ☒	County ☐	District ☐	Federal ☐	Indian ☐	Municipal ☐	State ☐	Other ☐
		Street/PO Box: 522 Milliken Dr			City: Hebron		State: OH			
		Zip Code: 43025		Country: USA		Operator's Phone #: (203) 542-6000				
Violations Found?		☒ Yes ☐ No ☐ Undetermined at Time of Inspection								
Type of Handler		☐ UNKNOWN: Cited for Violation of 3745-52-11 ☐ Not a HW Generator ☒ Large Quantity Generator (LQG) ☐ LQG Consolidator of VSQG HW ☐ Small Quantity Generator (SQG) ☐ Very Small Quantity Generator (VSQG)								

Ohio EPA RCRA Subtitle C Verification Form- Inspector Use

Email Completed Forms to EPA.RCRAInfoData@epa.ohio.gov

Type of Regulated Waste Activity- Mark all that Apply

- | | |
|---|---|
| ☐ Hazardous Waste Transporter | ☐ Receives Hazardous Waste from Off-site |
| ☐ Hazardous Waste Transfer Facility | ☐ Underground Injection Control Facility |
| ☐ Treater, Storer or Disposer of Hazardous Waste | ☐ U.S. Importer of Hazardous Waste |
| ☐ Recycler of Hazardous Waste | ☐ Recognized Trader |
| ☐ Stores prior to recycling | ☐ Importer ☐ Exporter |
| ☐ Does not store prior to recycling | ☐ Spent Lead-Acid Battery |
| ☐ 72-Hour Recycler | ☐ Importer ☐ Exporter |
| ☐ Exempt Boiler and/or Industrial Furnace | ☐ Electronic Manifest Broker |
| ☐ Small Quantity On-Site Burner Exemption | |
| ☐ Smelting, Melting, Refining Furnace Exemption | |

Universal Waste Activities- Mark all that Apply

- | | |
|---|---|
| ☒ Small Quantity Handler of Universal Waste | ☐ Destination Facility for Universal Waste |
| ☐ Large Quantity Handler of Universal Waste | |

Mark Types of Universal Waste Managed

- | | |
|---|---|
| ☒ Batteries | ☐ Aerosol containers |
| ☐ Pesticides | ☐ Antifreeze |
| ☐ Mercury containing equipment | ☐ Paint and paint-related wastes |
| ☐ Lamps | |

Used Oil Activities- Mark all that Apply

- ☒ Used Oil Generator
- ☐ Used Oil Transporter
- ☐ Used Oil Transfer Facility
- ☐ Used Oil Processor
- ☐ Used Oil Re-refiner
- ☐ Off-Specification Used Oil Burner
- ☐ Used Oil Fuel Marketer **who directs** shipment of Off-Spec Used Oil
- ☐ Used Oil Fuel Marketer **who first claims** the Used Oil meets the specifications

Eligible Healthcare Facilities and Reverse Distributors: Facility has previously notified that they are opting into managing hazardous waste pharmaceuticals pursuant to OAC rules 3745-266-500 through 3745-266-510. Check the box below to indicate the facility type.

- | | |
|--|--|
| ☐ Healthcare Facility | ☐ Reverse Distributor |
|--|--|

Eligible Academic Entities with Laboratories: Check the box(es) below to indicate the laboratory type.

- ☐ College or University
- ☐ Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
- ☐ Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

Ohio EPA RCRA Subtitle C Verification Form- Inspector Use

Email Completed Forms to EPA.RCRAInfoData@epa.ohio.gov

Waste Codes for Federally Regulated Hazardous Wastes: Please list the codes for the federally regulated hazardous waste handled at the site. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead, just indicate the date of the most recent source record. If a handler type is VSQG, SQG, or LQG there should be at least one HW code provided below.

D018

D001

Hazardous Secondary Material Activity: Facility has previously notified that they are opting into managing excluded HSM in compliance with OAC rules 3745-50-23, 3745-51-04(A)(23), (24), (25), or (27). **See last page for facility code definitions.**

- A. Facility Code-
- B. Waste Code(s) for HSM-
- C. Estimated Short Tons of Excluded HSM to be Managed Annually-
- D. Actual Short Tons of Excluded HSM that was Managed During the Most Recent Odd-Numbered Year-
- E. Land-Based Unit-

- A. Facility Code-
- B. Waste Code(s) for HSM-
- C. Estimated Short Tons of Excluded HSM to be Managed Annually-
- D. Actual Short Tons of Excluded HSM that was Managed During the Most Recent Odd-Numbered Year-
- E. Land-Based Unit-

- A. Facility Code-
- B. Waste Code(s) for HSM-
- C. Estimated Short Tons of Excluded HSM to be Managed Annually-
- D. Actual Short Tons of Excluded HSM that was Managed During the Most Recent Odd-Numbered Year-
- E. Land-Based Unit-

Additional Information for Internal Notes in RCRAInfo

Announced Inspection	☐ Yes	☒ No
Waste Stored in Tanks	☒ Yes	☐ No
Waste Stored in Containers	☒ Yes	☐ No

Additional Facility Representatives

Inspector Comments:

Photo 1 – Roll-off dumpster in eastern portion of gravel lot containing benzene wastewater and sludge (D018), unlabeled and partially uncovered at the time of inspection.



Photo 2 – One of two roll-off dumpsters in southern portion of gravel lot labeled as hazardous waste liquid containing benzene (D018), undated at the time of inspection.



Photo 3 – Label from Photo 2.

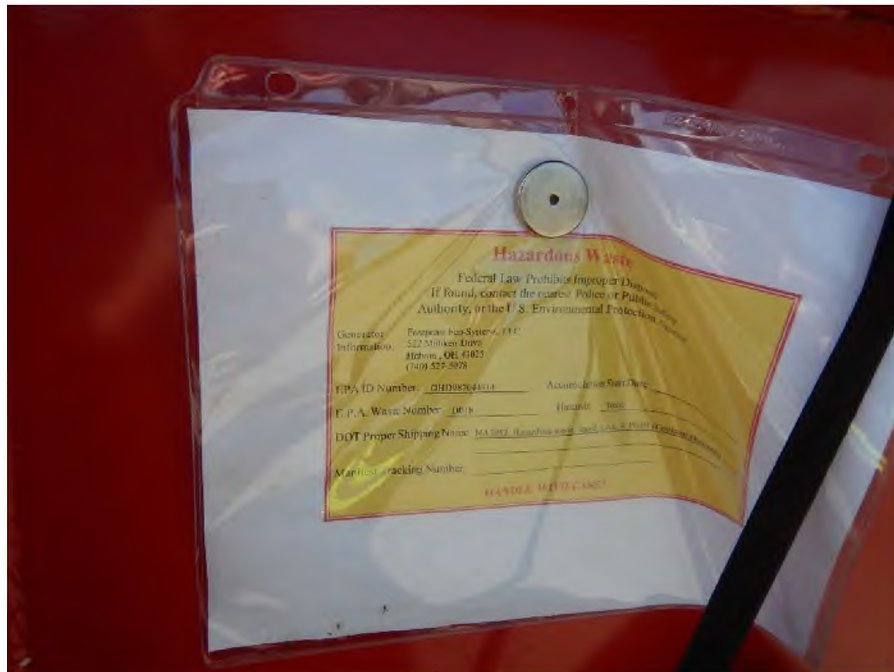


Photo 4 – Photo submitted by facility. Roll-off dumpster from Photo 1 properly labeled, dated, and covered.



Photo 5 – Photo submitted by facility. Label on roll-off dumpster from Photos 1 and 4.

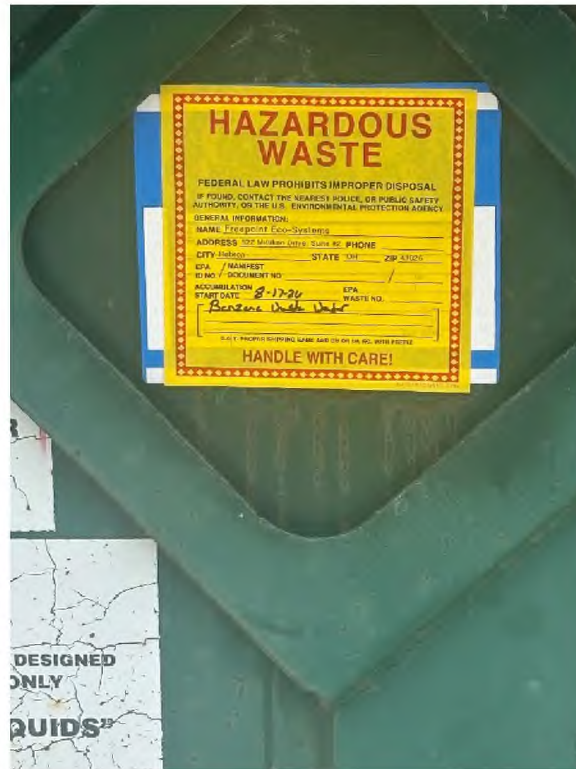


Photo 6 – Photo submitted by facility. Label from one of two roll-off dumpsters in southern portion of gravel lot. Date added to label.



Photo 7 – Photo submitted by facility. Other label from one of two roll-off dumpsters in southern portion of gravel lot. Date added to label.



LARGE QUANTITY GENERATOR CHECKLIST

VSQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: $\text{Amount in gallons} \times \text{Specific Gravity} \times 8.345 = \text{Amounts in pounds}$.

Special Safety Equipment Requirements other than level D:

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes ☒	No ☐	N/A ☐
2.	Has the generator maintained records of the hazardous waste determinations for three years from the date the hazardous waste was last sent to on-site or off-site treatment, storage, or disposal? [3745-52-11(F)]	Yes ☒	No ☐	N/A ☐
3.	If a waste is determined to be hazardous, has the generator identified all applicable EPA hazardous waste numbers in rules 3745-51-20 to 3745-51-24 and 3745-51-30 to 3745-51-35? 3745-52-11(G)]	Yes ☒	No ☐	N/A ☐
4.	Has the generator determined their generator category? [3745-52-13]	Yes ☒	No ☐	N/A ☐
5.	Has the generator received an EPA identification number from U.S. EPA or Ohio EPA which allows them to treat, store, dispose of, transport, or offer for transportation, hazardous waste? [OAC rule 3745-52-18(A)]	Yes ☒	No ☐	N/A ☐
6.	Has the generator re-notified Ohio EPA starting in 2021 by March first of each even-numbered year thereafter using Ohio EPA form EPA 9029? The generator may submit this re-notification as part of the biennial report required under rule 3745-52-41. [3745-52-18(D)(2)]	Yes ☒	No ☐	N/A ☐
7.	Were biennial reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)] (filed on even years for previous year)	Yes ☒	No ☐	N/A ☐
8.	Has the generator kept a copy of each biennial report and exception report for a period of at least three years after the due date of the report. OAC rule [3745-52-40(B)]	Yes ☒	No ☐	N/A ☐
9.	Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F). (OAC rule 3745-52-10(A)(3) must also be cited)]	Yes ☐	No ☒	N/A ☐
RMK				
10.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes ☐	No ☒	N/A ☐

11.	Does the generator accumulate hazardous waste in containers, tanks, drip pads or containment buildings? [3745-52-17(A)(1), (2), (3), (4)]		Yes ☒	No ☐	N/A ☐
NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-17 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.					
12.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director [ORC § 3734.02(E)&(F)]?		Yes ☐	No ☒	N/A ☐
NOTE: A large quantity generator may accumulate or treat hazardous waste on-site for no more than ninety days, unless the large quantity generator has been granted an extension to the ninety-day period. Such extension may be granted by the Director. An extension of up to thirty days may be granted at the discretion of the Director on a case-by-case basis. [3745-52-17(B)]					
13.	Does the generator accumulate or treat hazardous waste in a: [ORC 3734.02(E)&(F)]				
	a.	Container that meets 3745-52-17 (A)(1) ?	Yes ☒	No ☐	N/A ☐
	b.	Tank that meets 3745-52-17(A)(2) ?	Yes ☒	No ☐	N/A ☐
	c.	Drip pads that meet 3745-52-17(A)(3) ?	Yes ☐	No ☐	N/A ☒
	d.	Containment building that meets 3745-52-17(A)(4) ?	Yes ☐	No ☐	N/A ☒
NOTE: Complete appropriate checklist for each unit.					
NOTE: If waste is treated to meet LDRs, use LDR checklist.					
NOTE: if F006 waste is generated and accumulated for greater than 90 days see OAC rule 3745-52-17(C) through (E)					
SATELLITE ACCUMULATION AREA REQUIREMENTS					
14.	Does the generator ensure that satellite accumulation area(s):				
	a.	Are at or near a point of generation? [3745-52-15(A)]	Yes ☐	No ☐	N/A ☒
	b.	Are under the control of the operator of the process generating the waste? [3745-52-15(A)]	Yes ☐	No ☐	N/A ☒
	c.	Containers are in good condition? [3745-52-15(A)(1)]	Yes ☐	No ☐	N/A ☒
RMK					
	d.	Containers are made of or lined with materials that are compatible with the hazardous waste to be accumulated? [3745-52-15(A)(2)]	Yes ☐	No ☐	N/A ☒
	e.	Has the generator complied with the special standards for incompatible wastes? [3745-52-15(A)(3)]			

	i.	Has the generator placed incompatible wastes, or incompatible wastes and materials in the same container and ensured that it is done in accordance with 3745-65-17(B) ? [3745-52-15(A)(3)(a)]	Yes ☐ No ☐ N/A ☒
	ii.	Has hazardous waste been placed in an unwashed container that previously held incompatible waste or material? [3745-52-15(A)(3)(b)]	Yes ☐ No ☐ N/A ☒
	iii.	Have containers holding hazardous waste that is incompatible with any waste or other materials accumulated nearby in other containers been separated or protected from the incompatible waste or material by any practical means? [3745-52-15(A)(3)(c)]	Yes ☐ No ☐ N/A ☒
f		Containers holding hazardous waste closed during accumulation? [3745-52-15(A)(4)]	Yes ☐ No ☐ N/A ☒
g.		Containers are marked with words "Hazardous Waste?" [3745-52-15(A)(5)(a)]	Yes ☐ No ☐ N/A ☒
h.		Containers are marked with an indication of the hazards of the contents? [3745-52-15(A)(5)(b)]	Yes ☐ No ☐ N/A ☒
i.		Has the generator accumulated either acute hazardous waste listed in rule 3745-51-31 or paragraph (E) of the rule 3745-51-33 of the Administrative Code or non-acute hazardous waste in excess of the amounts listed in paragraph (A) of this rule at or near any point of generation? If yes, did the generator comply with the following:	
	i.	Within three consecutive days, comply with the applicable central accumulation are requirements in paragraph (A) of rule 3745-52-17 of the Administrative Code? [3745-52-15(A)(6)(a)]	Yes ☐ No ☐ N/A ☒
	ii.	Removed the excess from the satellite accumulation area within three consecutive calendar days to one of the following: [3745-52-15(A)(6)(b)]	Yes ☐ No ☐ N/A ☒
	a.	A central accumulation area operated in accordance with the applicable requirements in paragraph (B) or rule 3745-52-16 or paragraph (A) of rule 3745-52-17 of the Administrative Code. [3745-52-15(A)(6)(b)(i)]	Yes ☐ No ☐ N/A ☒
RMK			

		b.	An on-site permit by rule or permitted treatment, storage, or disposal facility. [3745-52-15(A)(6)(b)(ii)]	Yes ☐ No ☐ N/A ☒
		c.	An off-site designated facility. [3745-52-15(A)(6)(b)(iii)]	Yes ☐ No ☐ N/A ☒
	iii.	During the three-consecutive-calendar-day period, did the generator continue to comply with paragraphs (A)(1) to (A)(5) of this rule? And mark or label the container holding the excess accumulation of hazardous waste with the date the excess amount began accumulating? [3745-52-15(A)(6)(c)]		Yes ☐ No ☐ N/A ☒

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

CONSOLIDATION OF HAZARDOUS WASTE RECEIVED FROM VERY SMALL QUANTITY GENERATORS

15.	Does the generator consolidate waste from a very small quantity generator? If so, did the generator:			Yes ☐ No ☒ N/A ☐
	a.	Notify Ohio EPA at least thirty days prior to receiving the first shipment from a very small quantity generator? [3745-52-17(F)(1)]		Yes ☐ No ☐ N/A ☒
	i.	Identify on the form the name and site address for the VSQG as well as the name and business telephone number for a contact person for the VSQG? [3745-52-17(F)(1)(a)]		Yes ☐ No ☐ N/A ☒
	ii.	Submit an updated Ohio EPA form EPA 9029 within thirty days after a change in the name or site address for the VSQG? [3745-52-17(F)(1)(b)]		Yes ☐ No ☐ N/A ☒
	b.	Maintain records of shipments for three years from the date the hazardous waste was received from the VSQG? [3745-52-17(F)(2)]		Yes ☐ No ☐ N/A ☒
	c.	Properly labeled the hazardous waste received from the VSQG? [3745-52-17(F)(3)]		Yes ☐ No ☐ N/A ☒

NOTE: Large quantity generators may accumulate or treat on-site hazardous waste received from very small quantity generators under control of the same "person," as defined in rule 3745-50-10 of the Administrative Code, without a storage permit or permit by rule and without complying with Chapters 3745-50, 3745-54 to 3745-57, 3745-65 to 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code and the requirement to notify Ohio EPA or U.S. EPA of regulated waste activity, provided that the large quantity generator complies with all of the preceding conditions. "Control," for the purposes of this rule, means the power to direct the policies of the generator, whether by the ownership of stock, voting rights, or otherwise, except that contractors who operate generator facilities on behalf of a different person shall not be deemed to "control" such generators.

RMK	

USE AND MANAGEMENT OF CONTAINERS IN CENTRAL ACCUMULATION AREAS			
16.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-17(A)(5)(a)(i)] See RMK below		Yes ☐ No ☒ N/A ☐
17.	Has the generator made an indication of the hazards of the contents? [3745-52-17(A)(5)(a)(ii)]		Yes ☒ No ☐ N/A ☐
18.	Is the date upon which each period of accumulation begins clearly marked and visible for inspection on each container? [3745-52-17(A)(5)(a)(iii)] See RMK below		Yes ☐ No ☒ N/A ☐
19.	If the hazardous waste is placed in containers, the generator must comply with the following: [3745-52-17(A)(1)]		
	a.	Is the container in good condition? [3745-52-17(A)(1)(b)]	Yes ☒ No ☐ N/A ☐
	b.	Is the container compatible with the wastes stored in them? [3745-52-17(A)(1)(c)]	Yes ☒ No ☐ N/A ☐
	c.	Is the container holding hazardous waste kept closed during accumulation except when necessary to add or remove waste? [3745-52-17(A)(1)(d)(i)] See RMK below	Yes ☐ No ☒ N/A ☐
	d.	Has the container holding hazardous waste been opened, handled, or stored in a manner that may rupture the container or cause the container to leak? [3745-52-17(A)(1)(d)(ii)]	Yes ☐ No ☒ N/A ☐
NOTE: Record location on process summary sheets (if completing), in the inspection report, photograph the area, and record on facility map.			
20.	Is the central accumulation area inspected at least once a week? [3745-52-17(A)(1)(e)]		Yes ☐ No ☐ N/A ☒
21.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-52-17(A)(1)(f)i]		Yes ☒ No ☐ N/A ☐
NOTE: A large quantity generator may obtain written approval from the authority having jurisdiction over the local fire code allowing a shorter distance than 50 feet from the facility's property line. A record of the written approval shall be maintained as long as ignitable or reactive hazardous waste is accumulated in the area.			
22.	Are containers of ignitable and reactive wastes which are incompatible stored separately and protected from sources of ignition or reaction? [3745-52-17(A)(1)(f)ii]		Yes ☒ No ☐ N/A ☐

Yes

23.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-52-17(A)(1)(g)(i)]	Yes ☐ No ☐ N/A ☒
24.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste or material, is it done in accordance with 3745-65-17(B)? [3745-52-17(A)(1)(g)(ii)]	Yes ☐ No ☐ N/A ☒
RMK	16. The roll-off dumpster containing benzene waste sludge (D018) next to the frac tank was not marked with the words "Hazardous Waste" at the time of inspection.	
	18. The roll-off dumpster next to the frac tank, and the roll-off dumpsters in the southeast corner of the same gravel lot were not dated at the time of inspection.	
	19c. The roll-off dumpster next to the frac tank was not closed at the time of inspection.	
25.	Are containers that are holding hazardous waste that is incompatible with any waste or other materials accumulated or stored nearby stored separately from each other by means of a dike, berm, wall, or other device? [3745-52-17(A)(1)(g)(iii)]	Yes ☐ No ☐ N/A ☒
26.	Where specifically authorized in Chapters 3745-65 to 3745-69 and 3745-256 of the Administrative Code, is the ... mixture or commingling of incompatible wastes, or incompatible wastes and materials, conducted so that it does not [3745-52-17(A)(1)(g):	
	a. Generate extreme heat or pressure, fire or explosion, or violent reaction? [3745-65-17(B)(1)]	Yes ☐ No ☐ N/A ☒
	b. Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health? [3745-65-17(B)(2)]	Yes ☐ No ☐ N/A ☒
	c. Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions? [3745-65-17(B)(3)]	Yes ☐ No ☐ N/A ☒
	d. Damage the structural integrity of the device or facility containing the Waste? [3745-65-17(B)(4)]	Yes ☐ No ☐ N/A ☒
	e. Through other like means threaten human health or the environment? [3745-65-17(B)(5)]	Yes ☐ No ☐ N/A ☒

In General:

Acids must be segregated from ignitables.
 Acids must be segregated from caustics.
 Corrosives should be segregated from flammables.
 Oxidizers should be segregated from EVERYTHING.
 Many corrosives are water-reactive.
 Most reactive organics must be segregated from inorganic reactive (metals).

INCOMPATIBLE WASTES - Some Deadly Combinations –

Acids + Oil or Grease = FIRE
 Acids + Caustics = HEAT/SPATTERING
 Caustics + Epoxies = EXTREME HEAT
 Chlorine Gas + Acetylene = EXPLOSION
 Flammable Liquids + Hydrogen Peroxide = FIRE/EXPLOSION
 Aluminum Powder + Ammonium Nitrate = EXPLOSION
 Sodium Cyanide + Sulfuric Acid = LETHAL GAS

Ammonia + Bleach = LETHAL GAS

NOTE: OAC [3745-65-17\(B\)](#) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

27.	Has the generator ceased using a central accumulation area (CAA) at the facility? If so, did the generator:		Yes ☒ No ☐ N/A ☐
	a.	Place a notice in the operating record within thirty days after ceasing the use of the CAA identifying the location of the unit? [3745-52-17(A)(8)(a)(i)] (With this option, the generator will have to notify Ohio EPA and demonstrate they have met the closure performance standards within 90 days after they close the facility.)	Yes ☒ No ☐ N/A ☐
	b.	Notify Ohio EPA that the generator has met the closure performance standards in 3745-52-17(A)(8)(c) for the CAA within 90 days after closing the unit? [3745-52-17(A)(8)(a)(ii)]	Yes ☐ No ☒ N/A ☐

NOTE: If the answer to 27.b. is "yes" please provide in the inspection report a description of the unit and documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standards in 3745-52-17(A)(8)(c) or (d) as applicable.

RMK	

PRE-TRANSPORT REQUIREMENTS

28.	Is the generator aware of the applicable DOT regulations for the packaging/ labeling requirements for the transport of its hazardous waste under 49 CFR Parts 173 , 49 CFR Part 178 , and 49 CFR Part 179 (tank cars) [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes ☒ No ☐ N/A ☐
29.	Does each container ≤119 gallons have a completed hazardous waste label used in transportation with the following words and information displayed in accordance with the requirements of 49 CFR 172.304 ? [3745-52-32(B)] "Hazardous waste - Federal law prohibits improper disposal. If found, contact the nearest police or public safety authority, or the United States Environmental Protection Agency. Generator's name and address _____ Generator's U.S. EPA identification number Manifest document number _____."	Yes ☒ No ☐ N/A ☐
30.	Is the generator aware of the applicable DOT regulations for the proper placarding of their hazardous waste with the initial transporter for off-site transportation per 40 CFR 172 Subpart F ? [3745-52-33]	Yes ☒ No ☐ N/A ☐

	Prior to shipping the waste off-site, has the generator marked the containers with all applicable EPA hazardous waste numbers according to rule 3745-52-32? [3745-52-11(G)]	Yes ☒ No ☐ N/A ☐
MANIFEST REQUIREMENTS		
31.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	
	In lieu of using the manifest form, a person required to prepare a manifest may prepare and use an electronic manifest, provided that the person does the following: (a) Complies with 3745-52-24 for use of electronic manifests (b) Complies with 40 C.F.R.3.10 for the reporting of electronic documents to U.S. EPA	Yes ☒ No ☐ N/A ☐
32.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)] & [3745-52-27(A)]	Yes ☒ No ☐ N/A ☐
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22 . In these situations, items (21) through (35) must also be completed. [3745-52-20(A)(1)]		
33.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes ☒ No ☐ N/A ☐
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]		
RMK		
34.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes ☐ No ☐ N/A ☒
35.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes ☒ No ☐ N/A ☐
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.		
36.	If the generator received a rejected load or residue, did the generator:	
	a. Sign item 20 of the new manifest or item 18c of the original manifest? [3745-52-23(F)(1)]	Yes ☐ No ☐ N/A ☒
	b. Provide the transporter a copy of the manifest? [3745-52-23(F)(2)]	Yes ☐ No ☐ N/A ☒

	c.	Send a copy of the manifest to the designated facility that returned the shipment with 30 days after delivery of the rejected shipment? [3745-52-23(F)(3)]	Yes ☐	No ☐	N/A ☒
37.		If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes ☐	No ☐	N/A ☒
38.		If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes ☐	No ☐	N/A ☒
39.		Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40(A)]	Yes ☐	No ☐	N/A ☒
NOTE: A generator who sends a shipment of hazardous waste to a TSD facility with the understanding that the TSD facility can accept and manage the waste and later receives that shipment back as a rejected load or residue may accumulate the waste on-site for <90 days or <180 days depending on the amount of hazardous waste on-site in that calendar month. [3745-52-17(G)]					
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.					
RMK					

40.	Does the generator export hazardous waste? If so: [3745-52-80]		Yes ☐	No ☒	N/A ☐
	a.	Has the generator notified U.S. EPA of export activity? CFR 262.53	Yes ☐	No ☐	N/A ☒
	b.	Has the generator complied with special manifest requirements? CFR 262.54	Yes ☐	No ☐	N/A ☒
	c.	For manifests that have not been returned to the generator: has an exception report been filed? CFR 262.55	Yes ☐	No ☐	N/A ☒
	d.	Has an annual report been submitted to U.S. EPA? CFR 262.56	Yes ☐	No ☐	N/A ☒
	e.	Are export related documents being maintained on-site? CFR 262.57	Yes ☐	No ☐	N/A ☒
NOTE: Ohio's rules have been rescinded. If you observe that the company is not in compliance with the federal rules about exporting hazardous waste, specifically that they do not have a U.S. EPA "Acknowledgment of Consent," the Central Office Compliance Assurance Section about forwarding this information to US. EPA.					
PERSONNEL TRAINING					

Personnel training records were not reviewed due to the scope of this focused compliance inspection.		
41.	Does the generator keep records and documentation of:	
	a. Job titles for each position at the facility related to hazardous waste management, and the name of the employee filling each job? [3745-52-17(A)(7)(d)(i)]	Yes ☐ No ☐ N/A ☒
	b. A written job description for each position listed under paragraph (A)(7)(d)(i) of this rule? [3745-52-17(A)(7)(d)(ii)]	Yes ☐ No ☐ N/A ☒
	c. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (A)(7)(d)(i) of this rule? [3745-52-17(A)(7)(d)(iii)]	Yes ☐ No ☐ N/A ☒
	d. Training or job experience, required under paragraphs (A)(7)(a) to (A)(7)(c) of this rule, has been given to, and completed by, facility personnel? [3745-52-17(A)(7)(d)(iv)]	Yes ☐ No ☐ N/A ☒
42.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-52-17(A)(7)(e)]	
NOTE: There is a section at the end of the checklist which can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.		
RMK		
43.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-52-17(A)(7)(a)(i)]	Yes ☐ No ☐ N/A ☒
44.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-52-17(A)(7)(a)(iii)]	Yes ☐ No ☐ N/A ☒
NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the conditions of exemption in this rule [3745-52-17(A)(7)(a)(iv)]		
45.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-52-17(A)(7)(a)(ii)]	Yes ☐ No ☐ N/A ☒

46.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-52-17(A)(7)(b)]		Yes ☐	No ☐	N/A ☒
47.	Do facility personnel take part in an annual review of the initial training required in paragraph (A)(7)(a) of this rule? [3745-52-17(A)(7)(c)]		Yes ☐	No ☐	N/A ☒
EMERGENCY PROCEDURES					
48.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If yes:		Yes ☐	No ☒	N/A ☐
	a.	Was the contingency plan implemented? [3745-52-260(B)]	Yes ☐	No ☐	N/A ☒
	b.	Did the facility follow the emergency procedures in 3745-52-265(A) through (I)?	Yes ☐	No ☐	N/A ☒
NOTE: OAC 3745-52-260(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.					
PREPAREDNESS AND PREVENTION					
A portion of the preparedness and prevention records were not reviewed due to the scope of this focused compliance inspection.					
49.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-52-251]		Yes ☒	No ☐	N/A ☐
50.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste?				
	a.	Internal communications or alarm system? [3745-52-252(A)]	Yes ☒	No ☐	N/A ☐
	b.	Emergency communication device? [3745-52-252(B)]	Yes ☒	No ☐	N/A ☐
RMK					
	c.	Portable fire control, spill control and decon equipment? [3745-52-252(C)]	Yes ☒	No ☐	N/A ☐
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-52-252(D)]	Yes ☒	No ☐	N/A ☐
NOTE: Verify that the equipment is listed in the contingency plan.					
51.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-52-253]		Yes ☐	No ☐	N/A ☒

52.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-52-252)? [3745-52-254(A)]	Yes ☒ No ☐ N/A ☐
53.	If there is only one employee on the premises, is there immediate access to a device (ex. phone, and hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-52-252)? [3745-52-254(B)]	Yes ☒ No ☐ N/A ☐
54.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-52-255]	Yes ☒ No ☐ N/A ☐
55.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-52-256(A)]	Yes ☐ No ☐ N/A ☒
56.	Has the generator maintained records documenting the confirmation of arrangements or the attempt to make such arrangements with the local fire department as well as other organizations necessary to respond to an emergency [3745-52-256(B)]	Yes ☐ No ☐ N/A ☒
57.	Has the generator provided documentation in the operating record in cases where the generator possesses twenty-four-hour response capabilities and sought a waiver from needing to make arrangements with local fire department or other organizations necessary to respond to an emergency? [3745-52-256(C)]	Yes ☐ No ☐ N/A ☒

CONTINGENCY PLAN

Contingency plan and quick reference guide were not reviewed due to the scope of this focused compliance inspection.

58.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-52-260(A)]	Yes ☐ No ☐ N/A ☒
RMK		
59.	Does the plan describe the following:	
	a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-52-261(A)]	Yes ☐ No ☐ N/A ☒

	b.	Arrangements with local police departments, fire departments, hospitals, contractors, state and local emergency response teams to coordinate emergency services? [3745-52-261(C)]	Yes ☐	No ☐	N/A ☒
	c.	A current list of names, and emergency telephone numbers of all persons qualified to act as emergency coordinator? [3745-52-261(D)]	Yes ☐	No ☐	N/A ☒
	d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-52-261(E)]	Yes ☐	No ☐	N/A ☒
	e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-52-261(F)]	Yes ☐	No ☐	N/A ☒
NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-52-261(B)]					
60.		Is a copy of the contingency plan and all revisions to the contingency plan maintained at the generator? [3745-52-262]	Yes ☐	No ☐	N/A ☒
61.		Has the generator submitted a copy of the contingency plan and all revisions to all local emergency responders (i.e., police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services)? [3745-52-262(A)]	Yes ☐	No ☐	N/A ☒
62.		Has the generator submitted a quick reference guide of the contingency plan to the local emergency responders identified in paragraph (A) of this rule that includes all of the following elements? [3745-52-262(B)]	Yes ☐	No ☐	N/A ☒
	a.	The types or names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time? [3745-52-262(B)(1)]	Yes ☐	No ☐	N/A ☒
	b.	The estimated maximum amount of each hazardous waste that may be present at any one time? [3745-52-262(B)(2)]	Yes ☐	No ☐	N/A ☒
	c.	The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff? [3745-52-262(B)(3)]	Yes ☐	No ☐	N/A ☒
	d.	A map of the facility showing where hazardous wastes are generated, accumulated, and treated and routes for accessing these wastes? [3745-52-262(B)(4)]	Yes ☐	No ☐	N/A ☒
	e.	A street map of the facility in relation to surrounding businesses, schools, and residential areas to understand how best to get to the	Yes ☐	No ☐	N/A ☒

		facility and how best to evacuate citizens and workers? [3745-52-262(B)(5)]	
	f.	The locations of water supply (e.g., fire hydrant and the flow rate)? [3745-52-262(B)(6)]	Yes ☐ No ☐ N/A ☒
	g.	The identification of on-site notification systems (e.g., a fire alarm that rings off-site, smoke alarms)? [3745-52-262(B)(7)]	Yes ☐ No ☐ N/A ☒
	h.	The name of the emergency coordinator and seven days a week, twenty-four-hour emergency telephone number? [3745-52-262(B)(8)]	Yes ☐ No ☐ N/A ☒
63.		If necessary, has the generator updated the quick reference guide and submitted the documents to the local emergency responders identified in paragraph (A) of this rule, or as appropriate, to the local emergency planning committee? [3745-52-262(C)]	Yes ☐ No ☐ N/A ☒
64.		Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-52-263]	Yes ☐ No ☐ N/A ☒
65.		Is an emergency coordinator available at all times (on-site or on-call)? [3745-52-264]	Yes ☐ No ☐ N/A ☒
NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.			
RMK			

LQG TANK SYSTEM REQUIREMENTS (OAC rules 3745-52-17(A)(2), 3745-52-17(A)(5)(b) and 3745-66-90 through 3745-66-99)				
1.	Is each tank clearly labeled /marked with the words “Hazardous Waste?” [3745-52-17(A)(5)(b)(i)]		Yes ☒	No ☐ N/A ☐
2.	Is each tank clearly marked with an indication of the hazards of the contents?” [3745-52-17(A)(5)(b)(ii)]		Yes ☒	No ☐ N/A ☐
3.	Does the generator demonstrate that hazardous waste has been emptied within 90 days after first entering the tank? [3745-52-17(A)(5)(b)(iii)]		Yes ☒	No ☐ N/A ☐
4.	Does the generator maintain inventory logs or records with the information required by 3745-52-17(A)(5)(b)? [3745-52-17(A)(5)(b)(iv)]		Yes ☒	No ☐ N/A ☐
TANK SYSTEM – GENERAL OPERATING REQUIREMENTS				
5.	Does the generator follow the general operating requirements below:			
	a.	Does the generator prevent placement of hazardous waste or treatment reagents in tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail? [3745-66-94(A)]	Yes ☒	No ☐ N/A ☐
	b.	Does the generator use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)? [3745-66-94 (B)]	Yes ☐	No ☐ N/A ☒
	c.	If a leak or spill has occurred in the tank system, has the generator complied with 3745-66-96? [3745-66-94 (C)]	Yes ☐	No ☐ N/A ☒
TANK SYSTEM – INSPECTION REQUIREMENTS				
6.	Has the generator documented the inspections required in 3745-66-95, in the operating record, including inspection of the following [3745-66-95(G)]:		Yes ☒	No ☐ N/A ☐
	a.	Data from leak detection equipment each operating day? [3745-66-95(A)]	Yes ☐	No ☐ N/A ☒
	b.	Spill control equipment each operating day? [3745-66-95(B)(1)]	Yes ☒	No ☐ N/A ☐
	c.	Above ground portion of tank each operating day? [3745-66-95(B)(2)]	Yes ☒	No ☐ N/A ☐
	d.	Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste each operating day? [3745-66-95(B)(3)]	Yes ☒	No ☐ N/A ☐
NOTE: “Each operating day” is each day that the tank system is being used to manage (store or treat) hazardous waste.				
7.	For tank systems using leak detection systems to alert facility personnel to leaks or implementing established workplace practices to ensure leaks are promptly identified, has the generator documented: [3745-66-95(C)]		Yes ☐	No ☐ N/A ☒
	a.	Inspections of spill control equipment weekly?	Yes ☐	No ☐ N/A ☒
	b.	Inspections of above ground portion of tank weekly?	Yes ☐	No ☐ N/A ☒
	c.	Inspections of construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste weekly?	Yes ☐	No ☐ N/A ☒
	d.	Use of the alternate inspection schedule, including a description of the established workplace practices at the facility?	Yes ☐	No ☐ N/A ☒
RMK				

8.	For ancillary equipment NOT provided with secondary containment, has the generator documented inspections of such equipment each operating day? [3745-66-95(E)]	Yes ☐	No ☐	N/A ☒
9.	Where applicable, did the generator inspect the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(F)(1)]	Yes ☐	No ☐	N/A ☒
10.	Where applicable, did the generator inspect all sources of impressed current at least bi-monthly? [3745-66-95(F)(2)] Contact engineering unit with questions about tank protection.	Yes ☐	No ☐	N/A ☒
TANK SYSTEM CLOSURE REQUIREMENTS (IN ADDITION TO CLOSURE REQUIREMENTS IN 3745-52-17)				
11.	If the generator has closed a <90 day tank, was closure reviewed and completed in accordance with OAC 3745-66-97 (except for paragraph C)?	Yes ☐	No ☐	N/A ☒
TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES				
12.	For tanks used to treat or store ignitable or reactive wastes, has the generator complied with one of the following: [3745-66-98(A)]	Yes ☒	No ☐	N/A ☐
	a. Is the waste treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the generator has conducted such activities in compliance with 3745-66-17(B) ? [3745-66-98(A)] ; or	Yes ☐	No ☐	N/A ☒
	b. Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A)] ; or	Yes ☒	No ☐	N/A ☒
	c. The tank is used solely for emergencies? [3745-66-98(A)]	Yes ☐	No ☐	N/A ☒
13.	If ignitable or reactive waste is stored or treated, ask the company if they can document how they determined that protective distances are maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (2008)? [3745-66-98(B)]	Yes ☐	No ☐	N/A ☒
14.	Has the generator placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material? [3745-66-99(A)] and/or (B)	Yes ☐	No ☐	N/A ☒
	a. If so, have the requirements of 3745-65-17(B) been met? [3745-66-99(A)] and/or (B)	Yes ☐	No ☐	N/A ☒
TANK SYSTEMS REQUIREMENTS				
15.	Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-66-92(A)] See RMK below	Yes ☐	No ☒	N/A ☐
<i>NOTE: You should review the file to see if the written assessment has been previously reviewed. If so record the date of the review. If the inspector thinks the assessment need to be reviewed by the engineering unit, collect a copy of the assessment and forwarded it to the engineering unit for review.</i>				
RMK	15. Written tank assessment not available.			

16.	Does the written assessment include the following: [3745-66-92(A)]							
	a.	Certification by a qualified professional engineer? [3745-66-92(A)]	Yes	☐	No	☒	N/A	☐
	b.	Consideration of the design standards of the system? [3745-66-92(A)]	Yes	☐	No	☒	N/A	☐
	c.	Consideration of the hazardous characteristics of the waste(s)? [3745-66-92(A)]	Yes	☐	No	☒	N/A	☐
	d.	An evaluation by a corrosion expert (only if the external system/components are metal and in contact with soil or water)? [3745-66-92(A)]	Yes	☐	No	☒	N/A	☐
	e.	A determination of design and operational measures that will be needed to protect the tank system from potential damage (only for underground tank components)? [3745-66-92(A)]	Yes	☐	No	☒	N/A	☐
	f.	Design considerations to ensure that the tank foundations will maintain the load of a full tank? [3745-66-92(A)]	Yes	☐	No	☒	N/A	☐
	g.	Design considerations for anchoring the unit to prevent floatation (only for tanks situated in a seismic fault zone or saturated zone)? [3745-66-92(A)]	Yes	☐	No	☒	N/A	☐
	h.	Design considerations to ensure that the tank system will withstand the effects of frost heave? [3745-66-92(A)]	Yes	☐	No	☒	N/A	☐
NOTE: CO-DERR Engineering staff are available to assist you with evaluation of the written assessment.								
17.	Are there written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)]		Yes	☐	No	☒	N/A	☐
	See RMk below							
	Do the written statements address all of the following:							
	a.	Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)]	Yes	☐	No	☐	N/A	☒
	b.	Statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)]	Yes	☐	No	☐	N/A	☒
	c.	Proper backfilling? [3745-66-92(C)]	Yes	☐	No	☐	N/A	☒
	d.	Tightness test; if the tank system was found not to be tight, does the statement indicate that proper repairs were made? [3745-66-92(D)]	Yes	☐	No	☐	N/A	☒
	e.	Proper support and protection of ancillary equipment? [3745-66-92(E)]	Yes	☐	No	☐	N/A	☒
	f.	Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)]	Yes	☐	No	☐	N/A	☒
SECONDARY CONTAINMENT								
18.	Has secondary containment been provided? [3745-66-93(A)]		Yes	☒	No	☐	N/A	☐
NOTE: Secondary containment must be provided for tank systems that store or treat materials that become hazardous wastes within two years after the hazardous waste listing, or when the system has reached 15 years of age, whichever comes later. [3745-66-92(A)(2)]								
RMK	17. Written assessments not available.							

19.	Is secondary containment one of the following:		Yes ☒	No ☐	N/A ☐
	a	An External Liner ? [3745-66-93(E)(1)] If so,	Yes ☒	No ☐	N/A ☐
	i.	Is liner designed or operated to contain 100% of the capacity of the largest tank? See RMK below	Yes ☐	No ☒	N/A ☐
	ii.	Is liner designed and operated to prevent run-on and infiltration <u>or</u> the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	Yes ☒	No ☐	N/A ☐
	iii.	Is liner free of cracks and gaps?	Yes ☒	No ☐	N/A ☐
	iv.	Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release?	Yes ☒	No ☐	N/A ☐
	v.	Are chemically resistant water stops in place at all joints? <i>(concrete liners only)</i>	Yes ☐	No ☐	N/A ☒
	vi.	Is there a compatible interior coating or lining to prevent migration of waste into the concrete? <i>(concrete liners only)</i>	Yes ☐	No ☐	N/A ☒
	b	Vault System ? [3745-66-93(E)(2)] If so,	Yes ☐	No ☒	N/A ☐
	i.	Is vault system designed to contain 100% of the capacity in the largest tank?	Yes ☐	No ☐	N/A ☒
	ii.	Is liner designed and operated to prevent run-on and infiltration <u>or</u> the collection system has <u>excess</u> capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	Yes ☐	No ☐	N/A ☒
	iii.	Are chemically resistant water stops in place at all points?	Yes ☐	No ☐	N/A ☒
	iv.	Is there a compatible interior coating to prevent migration into the concrete?	Yes ☐	No ☐	N/A ☒
	v.	For ignitable or reactive waste : Is the vault system provided with means to prevent (or alternatively "protect against") the formation or ignition of vapors?	Yes ☐	No ☐	N/A ☒
	vi.	Is vault system provided with an exterior moisture barrier?	Yes ☐	No ☐	N/A ☒
	c	Double-Walled Tank ? [3745-66-93(E)(3)] If so,	Yes ☐	No ☒	N/A ☐
	i.	Is double-walled tank designed as an integral structure to contain any release from the inner tank?	Yes ☐	No ☐	N/A ☒
	ii.	If metal , are the primary tank interior and outer shell exterior surfaces protected from corrosion?	Yes ☐	No ☐	N/A ☒
	iii.	Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time?	Yes ☐	No ☐	N/A ☒
	d	An Equivalent Device ? As described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D)&(E)]	Yes ☐	No ☐	N/A ☒
RMK	19.a.i: Liner under tank is not designed to contain 100% capacity of tank.				

SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION				
20.	Has each secondary containment system been designed, installed and operated to prevent <u>any</u> migration of wastes or liquid to the soil, groundwater, or surface water and is it capable of <u>detecting</u> and <u>collecting</u> releases and accumulated liquids? [3745-66-93(B)(1)&(2)]	Yes ☒	No ☐	N/A ☐
21.	Does the secondary containment system meet the following minimum requirements of [3745-66-93(C)]:			
a.	Constructed or lined with compatible materials of sufficient strength to prevent failure? [3745-66-93(C)(1)]	Yes ☒	No ☐	N/A ☐
b.	Placed on a foundation or base capable of providing support? [3745-66-93(C)(2)]	Yes ☒	No ☐	N/A ☐
c.	Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time? [3745-66-93(C)(3)]	Yes ☒	No ☐	N/A ☐
d.	Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? [3745-66-93(C)(4)]	Yes ☒	No ☐	N/A ☐
e.	Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner? [3745-66-93(C)(4)]	Yes ☒	No ☐	N/A ☐
ANCILLARY EQUIPMENT REQUIREMENTS				
22.	Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)?	Yes ☐	No ☒	N/A ☐
	If not, is the ancillary equipment one of the following: [3745-66-93(F)]			
a.	Above ground piping (exclusive of flanges, joints, valves and connections) that is inspected daily?	Yes ☐	No ☐	N/A ☒
b.	Welded flanges, welded joints and/or welded connections that are inspected daily?	Yes ☐	No ☐	N/A ☒
c.	Sealless or magnetic coupling pumps and/or sealless valves that are inspected daily?	Yes ☐	No ☐	N/A ☒
d.	Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown and/or loss of pressure-actuated shut-off devices) that are inspected daily?	Yes ☐	No ☐	N/A ☒
TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE				
23.	Has there been a leak or spill from any tank system or has any tank system been found unfit for use? If so, did the generator:	Yes ☐	No ☒	N/A ☐
NOTE: If the tank is found to be unfit for use, inspector should explain why.				
a.	Immediately cease flow of material into tank and investigate the cause of the release? [3745-66-96(A)]	Yes ☐	No ☐	N/A ☒
b.	Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time? [3745-66-96(B)(1)]	Yes ☐	No ☐	N/A ☒
c.	Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment? [3745-66-96(B)(2)]	Yes ☐	No ☐	N/A ☒
d.	For a visible release to the environment, immediately conduct a visual inspection of the release? [3745-66-96(C)]	Yes ☐	No ☐	N/A ☒
RMK				

23. Cont.	Has there been a leak or spill from any tank system or has any tank system been found unfit for use? If so , did the generator:			
e.	For a visible release to the environment, prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C)]	Yes ☐	No ☐	N/A ☒
f.	For a visible release to the environment, properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)]	Yes ☐	No ☐	N/A ☒
g.	Report any release to the environment to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)]	Yes ☐	No ☐	N/A ☒
h.	For a release to the environment, submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)]	Yes ☐	No ☐	N/A ☒
i.	Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)(2)]	Yes ☐	No ☐	N/A ☒
j.	For a release from a tank system without secondary containment, did the generator provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)]	Yes ☐	No ☐	N/A ☒
NOTE: The requirements noted in 20.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.				
24.	In the event that the repairs to the tank system were major (e.g., replacement of liner, repair of ruptured primary or secondary containment structure), did the generator obtain a certification from a qualified professional engineer attesting that the repaired unit is capable of handling hazardous waste? [3745-66-96(F)]	Yes ☐	No ☐	N/A ☒
25.	Was a copy of the certification submitted to the director within seven days after returning the system to use? [3745-66-96(F)]	Yes ☐	No ☐	N/A ☒
26.	If the generator was unable to repair and return the unit to service as described in 23.a through 20.j, was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)] Contact Engineering Unit for assistance.	Yes ☐	No ☐	N/A ☒
27.	Does the generator have a tank system with a variance from secondary containment from which a release has occurred but has not migrated beyond the zone of engineering control? If so ,	Yes ☐	No ☐	N/A ☒
a.	Has the generator complied with 3745-66-96(A) through (F), except (D), and decontaminated soils? [3745-66-93(G)(3)]	Yes ☐	No ☐	N/A ☒
b.	If soils cannot be decontaminated/removed, has the generator complied with 3745-66-97(B)? [3745-66-93(G)(3)]	Yes ☐	No ☐	N/A ☒
28.	Does the generator have a tank system with a variance from secondary containment from which a release occurred and has migrated from the zone of engineering control? If so ,	Yes ☐	No ☐	N/A ☒
a.	Has the generator complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)]	Yes ☐	No ☐	N/A ☒
b.	If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the generator complied with 3745-66-97(B)? [3745-66-93(G)(4)]	Yes ☐	No ☐	N/A ☒
RMK				

ORGANIC AIR EMISSION STANDARDS
LARGE QUANTITY GENERATOR CHECKLIST
TANKS - OAC RULE 3745-256-85

Notes: This checklist is a screening tool and doesn't include a comprehensive list of all rule requirements. In some instances, it will be necessary to reference the rules to evaluate full compliance. This checklist doesn't include pressure tanks. Tanks vented through a closed vent system to a control device have additional inspection and monitoring requirements specified in 3745-256-88 which references 3745-256-33(K). Utilize the notes section to identify tank identification numbers and Y or N for compliance if there are multiple tanks.

Applicability: The average volatile organic concentration of the hazardous waste in each waste management unit is equal to or greater than 500 parts per million by weight at the point of origination.

Does an exemption or exclusion apply? (circle or underline)

Exemptions: average volatile organic concentration less than 500 parts per million by weight at point of origination, organic content of waste reduced by one of eight acceptable processes described in 3745-256-83(C)(2)(a)-(h), certain biological treatment tank systems, waste meets LDR when placed in unit, or tank system within an enclosure used for bulk feed to incinerator [\[3745-256-83\]](#)

LQG Exclusions: wastewater treatment units and elementary neutralization units, emergency or spill management units, totally enclosed treatment facilities, hazardous waste recycling units (at non permitted facilities), satellite accumulation areas, and universal waste [\[3745-65-01\]](#)

Exclusions: no waste added since October 6, 1996, less than 26.4 gallons, stopped adding waste to unit and unit undergoing closure per approved plan, unit used solely for onsite treatment or storage related to remedial activities, unit used solely to manage radioactive mixed waste, or unit operates in compliance with a CAA regulation (40 CFR 60, 61, or 63), universal wastes [\[3745-256-80\]](#)

LEVEL 1 – FIXED ROOF TANKS

N/A ☐

Tank Design Capacity	Fixed Roof Level 1 Pressure Limits	Compliant? Y/N (If N, Level 2 Controls are needed)
≥ 40,000 gallons	≤ 5.2 kPa/0.75 psi	
39,999 to 20,001 gallons	≤ 27.6 kPa/4.0 psi	Y
≤ 20,000 gallons	≤ 76.6 kPa/11.1 psi	
Criteria	Determination Method	Compliant?
1. Determination [3745-256-85(C)(1)]	Has the owner or operator determined the maximum organic vapor pressure for the tank before the first time the hazardous waste is placed in the tank?	Yes ☐ No ☒ N/A ☐ Notes: Tank not managed as a hazardous waste storage tank or under applicable organic air emissions standards at the time of inspection.
2. Design Specification [3745-256-85(C)(2)]	Is the tank designed to form a continuous barrier over the entire surface area of the hazardous waste in	Yes ☒ No ☐ N/A ☐ Notes:

	the tank; installed such that there are no visible cracks, holes, gaps or other open spaces between roof and tank wall, closure device, and roof?	
	Is each opening in the fixed roof (sampling port, conservation vent, level indicator, safety valve, etc.) equipped with a closure device such that when closed there are no visible cracks, holes, gaps or other open spaces? Or Connected by a closed-vent system that is vented to a control device?	Yes ☒ No ☐ N/A ☐ Notes:
3. Transfer of Hazardous Waste [3745-256-85(J)]	Is the transfer of hazardous waste to the tank from another tank conducted using continuous hard piping or other closed system?	Yes ☒ No ☐ N/A ☐ Notes:
4. Operating Requirements [3745-256-85(C)(3)(a)] [3745-256-85(G)(2)(a)] -Level 2 Vented to Control Device	Are cover and closure devices closed at all times except when performing routine inspections, sampling, maintenance and cleaning? <i>Opening of a pressure/vacuum relief valve, conservation vent or similar device is allowed during normal operations to maintain tank pressure within design specifications. Opening of a safety device (e.g., emergency relief vent or flame arrestor is allowed at any time.</i>	Yes ☒ No ☐ N/A ☐ Notes:
5. Operating Requirements [3745-256-85(C)(3)(b)]	Are pressure/vacuum relief valves and conservation vents designed to operate with no detectable emissions when closed?	Yes ☐ No ☐ N/A ☒
6. Operating Requirements [3745-256-85(C)(3)(b)]	Are opening settings of pressure/vacuum relief valves consistent with the tank manufacturer's recommended operating ranges?	Yes ☐ No ☐ N/A ☒

7. Inspection Requirements [3745-256-85(C)(4)]	Are tanks inspected for defects when first in service and annually thereafter? See OAC rule 3745-256-85(L) for unsafe to inspect and monitor information.		Yes ☐ No ☐ N/A ☐ Notes:
8. Repair Requirements (Level 1 and Level 2) [3745-256-85(K)]	Are first efforts at repair no later than 5 calendar days after detection and completed no later than 45 calendar days after detection? <i>Repairs should be completed as soon as possible</i>		Yes ☐ No ☐ N/A ☒ Notes:
9. Recordkeeping Requirements [3745-256-90(B)(1)]	Are the following records maintained for 3 years?		Yes ☒ No ☐ N/A ☐ Notes: Facility opened in 2024.
	Unique ID number?		Yes ☒ No ☐ N/A ☐ Notes:
	A record for each inspection that includes the following:		
		Date of each inspection?	Yes ☒ No ☐ N/A ☐ Notes:
		Location of defect?	Yes ☒ No ☐ N/A ☐ Notes:
		Date defect was detected?	Yes ☒ No ☐ N/A ☐ Notes:
		Corrective action taken to repair defect?	Yes ☒ No ☐ N/A ☐ Notes:
		If delayed, the reason for delay and date of repair?	Yes ☒ No ☐ N/A ☐ Notes:

	Maximum organic vapor pressure of hazardous waste in tank?	Yes ☐ No ☒ N/A ☐ Notes: Tank not managed as a hazardous waste storage tank or under applicable organic air emissions standards at the time of inspection.
	If determined by testing, time and date of samples, analytical method, and results?	Yes ☐ No ☒ N/A ☐ Notes: Tank not managed as a hazardous waste storage tank or under applicable organic air emissions standards at the time of inspection.

LEVEL 2 - FIXED ROOF TANKS VENTED TO A CONTROL DEVICE

N/A ☒

Criteria	Determination Method	Compliant?
10. Design Specification [3745-256-85](G)(1)	Is the tank designed to form a continuous barrier over the entire surface area of the hazardous waste in the tank?	Yes ☐ No ☐ N/A ☒ Notes:
	Is each opening in the fixed roof that isn't vented to a control device equipped with a closure device?	Yes ☐ No ☐ N/A ☒ Notes:
	If the pressure in the vapor headspace underneath the fixed roof is less than atmospheric pressure when the control device is operating, and closure device is secured in the closed position, is it designed so there are no visible cracks, holes, gaps, or other open spaces in the closure device or between the perimeter of the cover opening and the closure device?	Yes ☐ No ☐ N/A ☒ Notes:
	If the pressure in the vapor headspace underneath the fixed roof is equal to or greater than atmospheric pressure when the control device is operating, is the closure device designed to operate with no detectable organic emissions?	Yes ☐ No ☐ N/A ☒ Notes:

11. Transfer of Hazardous Waste [3745-256-85](J)	Is the transfer of hazardous waste to the tank from another tank conducted using continuous hard piping or other closed system?	Yes ☐ No ☐ N/A ☒ Notes:
12. Operating Requirements [3745-256-85](G)(2)(a)	Are cover and closure devices closed at all times except when performing routine inspections, sampling, maintenance and cleaning? <i>Opening of a pressure/vacuum relief valve, conservation vent or similar device is allowed during normal operations to maintain tank pressure within design specifications. Opening of a safety device (e.g., emergency relief vent or flame arrestor) is allowed at any time.</i>	Yes ☐ No ☐ N/A ☒ Notes:
13. Inspection Requirements [3745-256-85](G)(3)(c)	Are tanks inspected for defects when first in service and annually thereafter? See OAC rule 3745-256-85(L) for unsafe to inspect and monitor information.	Yes ☐ No ☐ N/A ☒ Notes:
14. Inspection Requirements Closed Vent System [3745-256-33](K)(2)	If using a closed vent system that is under negative pressure, are closed vent system components and negative pressure systems inspected annually? <i>(The alternative is operating with no detectable emissions which has other requirements.)</i>	Yes ☐ No ☐ N/A ☒ Notes:
15. Inspection Requirements Closed Vent System [3745-256-88](B)(3)	When the closed-vent system includes bypass devices that could be used to divert the gas or vapor stream to the atmosphere before entering the control device, is each bypass device equipped with either a flow indicator or a seal or locking device?	Yes ☐ No ☐ N/A ☒ Notes:
16. Inspection Requirements Control Device [3745-256-88](C)(7)	Are the readings from monitoring devices inspected at least once each operating day?	Yes ☐ No ☐ N/A ☒ Notes:

17. Repair Requirements [3745-256-85](K)	Are first efforts at repair no later than 5 calendar days after detection and completed no later than 45 calendar days after detection? <i>Repairs should be completed as soon as possible</i>	Yes ☐ No ☐ N/A ☒ Notes:
18. Recordkeeping Requirements [3745-256-90](B)(1)	Are the following records maintained for 3 years?	
	Unique ID number?	Yes ☐ No ☐ N/A ☒ Notes:
	A record for each inspection that includes the following:	
	Date of each inspection?	Yes ☐ No ☐ N/A ☒ Notes:
	Location of defect?	Yes ☐ No ☐ N/A ☒ Notes:
	Date defect was detected?	Yes ☐ No ☐ N/A ☒ Notes:
	Corrective action taken to repair defect?	Yes ☐ No ☐ N/A ☒ Notes:
19. Recordkeeping Requirements [3745-256-90](E)(1)(a)	Is a certification signed and dated by the owner or operator stating the control device is designed to operate at the performance level documented by a design analysis or performance test?	Yes ☐ No ☐ N/A ☒ Notes:
20. Recordkeeping Requirements [3745-256-90](E)(1)(e)	Are records maintained for semiannual updates of planned maintenance maintained for 3 years?	Yes ☐ No ☐ N/A ☒ Notes:

21. Recordkeeping Requirements [3745-256-90](E)(1)(f)]	Are records maintained of unexpected malfunctions of the control device for 3 years? <i>If the control device is not a carbon absorber, condenser, flare, process heater, boiler or thermal vapor incinerator (regenerative thermal oxidizer), maintain records of proper operation and use (e.g., manufacturer's recommended documentation)</i>	Yes ☐ No ☐ N/A ☒ Notes:
LEVEL 2- FIXED ROOF TANKS USING INTERNAL FLOATING ROOF N/A ☒		
22. Design Specification [3745-256-85](E)(1)(a)]	Is the internal floating roof designed to float on the liquid surface except when supported by the leg supports?	Yes ☐ No ☐ N/A ☒ Notes:
23. Design Specification [3745-256-85](E)(1)(b)]	Is the internal floating roof equipped with a continuous seal between the wall of the tank and the floating roof edge that meets either of these requirements? Is a single continuous seal that is either a liquid-mounted seal or a metallic shoe seal (see OAC rule 3745-256-81), or Has two continuous seals mounted above the other. The lower seal may be a vapor-mounted seal.	Yes ☐ No ☐ N/A ☒ Notes:
24. Transfer of Hazardous Waste [3745-256-85](J)]	Is the transfer of hazardous waste to the tank from another tank conducted using continuous hard piping or other closed system?	Yes ☐ No ☐ N/A ☒ Notes:
25. Operating Requirements [3745-256-85](E)(2)(a-c)]	When the floating roof is resting on the leg supports, is the process of filling, emptying, or refilling continuous and completed as soon as practicable?	Yes ☐ No ☐ N/A ☒ Notes:
	Are automatic bleeder vents set closed at all times when the roof is floating, except when the roof is being floated off or is being landed on leg supports?	Yes ☐ No ☐ N/A ☒ Notes:
	Prior to filling the tank, are all openings bolted or fastened closed?	Yes ☐ No ☐ N/A ☒

	<i>Rim space vents are to be set to open only when the internal floating roof is not floating or when the pressure beneath the rim exceeds the manufacturer's recommended settings.</i>	Notes:
26. Inspection Requirements [3745-256-85(E)(3)(b)(i)]	Are tanks inspected for defects when first in service and annually thereafter? See OAC rule 3745-256-85(L) for unsafe to inspect and monitor information.	Yes ☐ No ☐ N/A ☒ Notes:
27. Inspection Requirements [3745-256-85(E)(3)(b)(ii)]	Is the internal floating roof, primary seal, secondary seal (if in service), gaskets, slotted membranes, and sleeve seals (if any) inspected each time the tank is emptied and degassed at least every 10 years? <i>If the floating roof is equipped with two continuous seals mounted one above the other, the owner or operator may alternatively inspect every 5 years.</i>	Yes ☐ No ☐ N/A ☒ Notes:
28. Inspection Requirements [3745-256-85(E)(3)(d)]	Prior to each inspection, did the owner or operator notify the Director in advance? <i>Prior to an inspection in a tank that has been emptied and degassed, written notification should be received by the Director at least 30 days prior to refilling (if planned) or no later than 7 days prior to refilling (if unplanned).</i>	Yes ☐ No ☐ N/A ☒ Notes:
29. Repair Requirements [3745-256-85(K)]	Are first efforts at repair no later than 5 calendar days after detection and completed no later than 45 calendar days after detection? <i>Repairs should be completed as soon as possible</i>	Yes ☐ No ☐ N/A ☒ Notes:
30. Recordkeeping Requirements [3745-256-90(B)(1)]	Are the following records maintained for 3 years? Unique unit ID number, inspection records, and repair records?	Yes ☐ No ☐ N/A ☒ Notes:

31. Recordkeeping Requirements [3745-256-90(B)(2)(b)]	Has the owner or operator prepared and maintained documentation describing the floating roof design?	Yes ☐ No ☐ N/A ☒ Notes:
LEVEL 2- FIXED ROOF TANKS USING EXTERNAL FLOATING ROOF		N/A ☒
32. Design Specification [3745-256-85(F)(1)(a)]	Is the external floating roof designed to float on the liquid surface except when supported by leg supports?	Yes ☐ No ☐ N/A ☒ Notes:
33. Design Specification [3745-256-85(F)(1)(b)]	Is the floating roof equipped with two continuous seals between the wall of the tank and the roof edge? See the rule for full list of requirements and specifications.	Yes ☐ No ☐ N/A ☒ Notes:
34. Transfer of Hazardous Waste [3745-256-85(J)]	Is the transfer of hazardous waste to the tank from another tank conducted using continuous hard piping or other closed system?	Yes ☐ No ☐ N/A ☒ Notes:
35. Operating Requirements [3745-256-85(F)(2)(a)]	When the floating roof is resting on the leg supports, is the process of filling, emptying, or refilling continuous and completed as soon as practicable?	Yes ☐ No ☐ N/A ☒ Notes:
36. Operating Requirements [3745-256-85(F)(2)(b)]	Except for automatic bleeder vents, rim space vents, roof drains, and leg sleeves, is each opening in the roof secured and maintained in a closed position at all times except when the closure device shall be open for access?	Yes ☐ No ☐ N/A ☒ Notes:
37. Operating Requirements [3745-256-85(F)(2)(c)]	Are covers on each access hatch and each gauge float well bolted or fastened when secured in the closed position?	Yes ☐ No ☐ N/A ☒ Notes:
38. Operating Requirements [3745-256-85(F)(2)(d)]	Are automatic bleeder vents set closed at all times when the roof is floating, except when the roof is being floated off or is being landed on the leg supports?	Yes ☐ No ☐ N/A ☒ Notes:
39. Operating Requirements [3745-256-85(F)(2)(e)]	Are rim space vents set to open only at those times that the roof is being floated off the roof leg supports or	Yes ☐ No ☐ N/A ☒ Notes:

	when the pressure beneath the rim seal exceeds the manufacturer's recommended setting?	
40. Operating Requirements [3745-256-85(F)(2)(f)]	Is the cap on the end of each unslotted guide pole secured in the closed position at all times except when measuring the level or collecting samples of the liquid in the tank?	Yes ☐ No ☐ N/A ☒ Notes:
41. Operating Requirements [3745-256-85(F)(2)(g)]	Is the cover on each gauge hatch or sample well secured in the closed position at all times except when the hatch or well is opened for access?	Yes ☐ No ☐ N/A ☒ Notes:
42. Operating Requirements [3745-256-85(F)(2)(h)]	Do both the primary seal and the secondary seal completely cover the annular space between the external floating roof and the wall of the tank in a continuous fashion except during inspections?	Yes ☐ No ☐ N/A ☒ Notes:
43. Inspection Requirements [3745-256-85(F)(3)(b)(ii)]	Are tanks and closure devices inspected for defects when first in service and annually thereafter? See OAC rule 3745-256-85(L) for unsafe to inspect and monitor information.	Yes ☐ No ☐ N/A ☒ Notes:
44. Inspection Requirements [3745-256-85(F)(3)(a)(i)]	Are primary seal gaps inspected initially within 60 days and at least once every five years?	Yes ☐ No ☐ N/A ☒ Notes:
45. Inspection Requirements [3745-256-85(F)(3)(a)(ii)]	Are secondary seal gap measurements performed initially within 60 days and once a year? See the rule for measurement procedures.	Yes ☐ No ☐ N/A ☒ Notes:
46. Inspection Requirements [3745-256-85(F)(3)(c)]	Prior to each inspection, did the owner or operator notify the Director in advance? <i>Prior to each inspection to measure roof seal gaps, written notification should be received by the Director at least 30 days prior to the measurement date. Prior to an inspection in a tank that has been emptied and degassed, written notification should be received</i>	Yes ☐ No ☐ N/A ☒ Notes:

	<i>by the Director at least 30 days prior to refilling (if planned) or no later than 7 days prior to refilling (if unplanned).</i>	
47. Repair Requirements [3745-256-85(K)]	Are first efforts at repair no later than 5 calendar days after detection and completed no later than 45 calendar days after detection? <i>Repairs should be completed as soon as possible</i>	Yes ☐ No ☐ N/A ☒ Notes:
48. Recordkeeping Requirements [3745-256-90(B)(1)]	Are the following records maintained for 3 years? Unique unit ID number inspection records repair records	Yes ☐ No ☐ N/A ☒ Notes:
49. Recordkeeping Requirements [3745-256-90(B)(2)(c)]	Has the owner or operator prepared and maintained documentation describing the floating roof design and dimensions of the tank?	Yes ☐ No ☐ N/A ☒ Notes:
50. Recordkeeping Requirements [3745-256-90(B)(2)(c)]	Has the owner or operator prepared and maintained records for each seal gap inspection describing the results of the measurements? Information should include the date performed, raw data obtained, and calculations of total gap surface area. If the measurements don't conform to specifications in 256-85(F)(1), there needs to be a description of repairs.	Yes ☐ No ☐ N/A ☒ Notes:

ORGANIC AIR EMISSION STANDARDS
LARGE QUANTITY GENERATOR CHECKLIST
CONTAINERS - OAC RULE 3745-256-87

Applicability: The average volatile organic concentration of the hazardous waste in each waste management unit is equal to or greater than 500 parts per million by weight at the point of origination.

Note: The concentration must be determined by using either direct measurement as specified in 3745-256-84(A)(3) or by knowledge as specified in 3745-256-84(A)(4). If sampling is conducted, a copy of the written sampling plan must be maintained on-site per OAC rule 3745-256-84(A)(3)(b)(iii). Samples must be prepared and analyzed in accordance with method [25D in 40 CFR Part 60 Appendix A](#) and the average VO concentration on a mass-weighted basis must be calculated by using the results for all waste determinations using the equation in [3745-256-84\(A\)\(3\)\(d\)](#).

Does an exemption or exclusion apply? (circle or underline)

Exclusions: no waste added since October 6, 1996, less than 26.4 gallons, stopped adding waste to unit and unit undergoing closure per approved plan, unit used solely for onsite treatment or storage related to remedial activities, unit used solely to manage radioactive mixed waste, or unit operates in compliance with a CAA regulation (40 CFR 60, 61, or 63), satellite accumulation areas, universal wastes [\[3745-256-80\]](#) [\[3745-65-01\]](#)

Exemptions: average volatile organic concentration less than 500 parts per million by weight at point of origination, organic content of waste reduced by one of eight acceptable processes, certain biological treatment tank systems, waste meets LDR when placed in unit, or tank system within an enclosure used for bulk feed to incinerator [\[3745-256-83\]](#)

Level 1

Containers are larger than 26.4 gallons and less than or equal to 121 gallons, or larger than 121 gallons and not managing hazardous waste in light material service.

Level 2

Containers are larger than 121 gallons and managing hazardous waste in light material service

Level 3

Containers are larger than 26.4 gallons and treating hazardous waste by stabilization.

(Note: Requirements for Level 3 containers are not included in this checklist.)

GENERAL REQUIREMENTS

1. Level 1 Controls

[\[3745-256-87\(C\)\]](#)

Is one of the following used?

1. Containers that meet [DOT requirements](#) (closed with UN rating)
2. A cover and closure device with no visible gaps, holes or other open spaces into the interior of the container
3. Organic vapor suppression on or over the hazardous waste in the container such that no hazardous waste is exposed to the atmosphere

Yes ☒ No ☐ N/A ☐

Notes:

2. Level 2 Controls

[\[3745-256-87\(D\)\]](#)

Is one of the following used?

1. Containers that meet DOT requirements

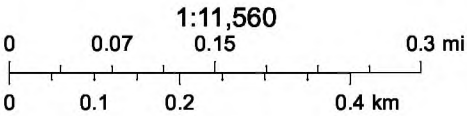
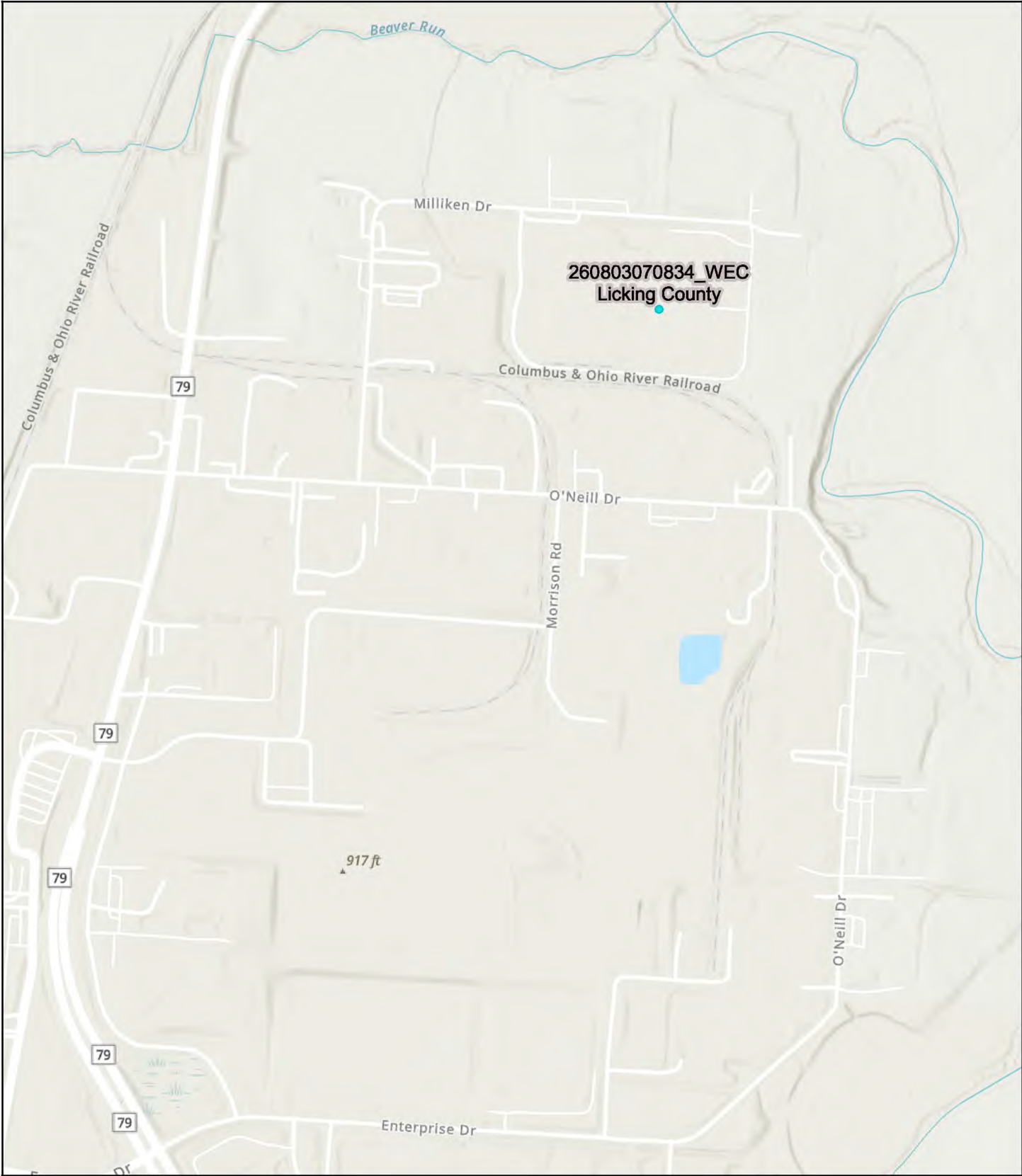
Yes ☐ No ☐ N/A ☒

Notes:

	2. Containers that operate with no detectible emissions, as verified by Method 21 3. Containers that are vapor-tight within the last 12 months, as verified by Method 27	
3. Operating Requirements [3745-256-87](C)(3)]- Level 1 [3745-256-87](D)(3)]- Level 2	Are covers, openings, and closure devices closed except during the following activities? 1. Transferring hazardous waste in and out of the containers 2. Between batch transfers not exceeding 15 minutes between transfer 3. While performing sampling and equipment access 4. When conservation and safety vents are operating <i>Note: If the person transferring hazardous waste leaves the area or the process shuts down, the container must be closed. Containers may be open while performing sampling or to obtain equipment access, safety valves and conservation vents may be used if normally left in the closed position, and a cover does not need to be placed on a "RCRA empty" container.</i>	Yes ☐ No ☒ N/A ☐ Notes: Roll-off dumpster containing benzene wastewater (D018) was not covered at the time of inspection.
4. Waste Transfer Requirements [3745-256-87](D)(2)]- Level 2 only	Is transfer of hazardous waste in or out of a container conducted in a manner as to minimize exposure of the hazardous waste to the atmosphere? <i>Note: Examples of loading procedures that Ohio EPA considers meeting the requirements include a submerged fill pipe or other submerged-fill method, vapor-balancing system or recovery system, or a fitted opening with a line purge.</i>	Yes ☐ No ☐ N/A ☒ Notes:
5. Inspection Requirements [3745-256-87](C)(4)]- Level 1	Are containers and containers' covers and closure devices inspected as follows:	Yes ☒ No ☐ N/A ☐ Notes:

[3745-256-87(D)(4)] - Level 2	1. When the facility accepts possession of the container, and it is not emptied within 24 hours 2. When a container remains at the facility for a period of one year or more- inspect once every 12 months thereafter.	
6. Repair Requirements [3745-256-87(C)(4)(c)] - Level 1 [3745-256-87(D)(4)(c)] - Level 2	When a defect is detected, is an attempt to repair made within 24 hours and repair made within 5 calendar days? or alternatively, is the container emptied and removed from service and not used until the defect is repaired?	Yes ☐ No ☐ N/A ☒ Notes:
7. Recordkeeping Requirements [3745-256-87(C)(5)] - Level 1 Only	If the container exceeds 121 gallons and doesn't meet DOT standards, does the facility have a copy of procedures used to determine the container is not managing hazardous waste in light material service?	Yes ☐ No ☐ N/A ☒ Notes:
Note: <i>Light material service- Both of the following conditions apply: the vapor pressure of one or more of the organic constituents in the material is greater than 0.3 kilopascals (kPa) at 20 °C; and the total concentration of the pure organic constituents having a vapor pressure greater than 0.3 kPa at 20 °C is equal to or greater than 20 percent by weight.</i>		

Ohio EPA Complaint



8/31/2026, 3:25:28 PM

- Complaints



Environmental Complaint Form

Complaint ID: 260803070834_WEC

Office: Central Office

Received By:

Date Received: 8/3/2026 12:09:32

Complainant Information

Complainant:

Phone:

Address: 522 Milliken Dr, Hebron, Ohio, 43025
Licking County

Email:

Source of Complaint

Source: FREEPOINT ECO-SYSTEMS

Contact:

Address: 522 Milliken Dr
Hebron, Ohio
43025

Phone:

Date of Complaint:

Lat.\Long.: 39.982302\ -82.476564

Nature of Complaint

Freepoint Eco-Systems' pyrolysis units were emitting benzene for at least three months (March-May 2026). The Ohio EPA needs to test the soil and any pyrolysis oil, hazardous waste, or char that remains on site immediately. Freepoint has already cleared out most of the plant, so this is urgent. They should also check the pond on site. Freepoint tested the workers blood in April and has withheld those results, despite workers asking for them.



Environmental Complaint Form

Photo(s)



Environmental Complaint Form

Investigation

Division: Division of Environmental
Program: Used Oil/Hazardous Waste
Investigator: Mason Harris

Complaint Type: Other
Referred To:
Investigation Status: Investigated -
Compliance Issues
Identified

Investigation Findings

Site visited 8/24/2026. Facility ceased operations earlier this year, is in process of decommissioning and cleaning out equipment. Benzene waste still being generated and shipped off-site. Char waste no longer regularly generated. Labeling and hazardous waste tank violations documented. Facility recommended to file for CRO.